

Multiple Ownership

WZZU(FM), Lynchburg, VA, the station subject to the instant application, is located in the Roanoke-Lynchburg, VA, Nielsen Audio Metro (the “Roanoke-Lynchburg Metro”). A total of 47 commercial and noncommercial educational full-power radio stations are located within or are reported by BIA as “home” to the Roanoke-Lynchburg Metro.¹

Grant of the instant application would result in the Assignee and its attributable parties having cognizable interests in the following three (3) commercial full-power AM stations and five (5) commercial full-power FM stations and in the Roanoke-Lynchburg Metro:

Call Sign	Location	Facility ID No.
WFIR(AM)	Roanoke, Virginia	31138
WPLY(AM)	Roanoke, Virginia	41111
WPLI(AM)	Lynchburg, Virginia	59709
WSLQ(FM)	Roanoke, Virginia	41112
WXLK(FM)	Roanoke, Virginia	9692
WVBE-FM	Lynchburg, Virginia	9690
WSLC-FM	Roanoke, Virginia	30156
WZZU(FM)	Lynchburg, Virginia	17407

Other than the above combination of stations, neither the Assignee nor its attributable parties would have any attributable interests in any other broadcast station located in or “home” to the Roanoke-Lynchburg Metro.

Pursuant to Section 73.3555 of the Commission’s rules, in a Nielsen Audio market reported by BIA as having 45 or more commercial and noncommercial full-power radio stations, a party may have a cognizable interest in up to eight (8) full-power commercial radio stations, not more than five (5) of which may be in the same service.

¹ See BIA FCC Geographic Market Definition for Roanoke-Lynchburg, VA, February 17, 2021.

Mel Wheeler, Inc.
Assignment Application
WZZU(FM), Lynchburg, VA

Accordingly, the Assignee's proposed combination of three (3) AM stations and five (5) FM stations in the Roanoke-Lynchburg Metro complies with the Commission's multiple ownership rules under the Nielsen Audio Metro Methodology.

Assignee is also the licensee of WVBB(FM). WVBB(FM)'s community of license, Elliston-Lafayette, Virginia, is not located within the geographic boundaries of the Roanoke-Lynchburg Metro and otherwise is not "home" to the Roanoke-Lynchburg Metro. Therefore, WVBB(FM) is not considered under the Nielsen Audio Metro Methodology.

The attached Technical Statement provides an analysis under the Commission's Interim Contour-Overlap Methodology and shows that WVBB(FM) does not overlap with the relevant markets. Accordingly, the proposed acquisition of WZZU(FM) also complies with the Commission's Interim Contour-Overlap Methodology.

Neither the Assignee nor its attributable parties have any attributable interests in any television station or newspaper.

For the foregoing reasons, the Assignee's proposed acquisition of WZZU(FM) complies with the Commission's multiple ownership rules.

* * * * *

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
MEL WHEELER, INC.
LYCHBURG, VIRGINIA

This radio multiple ownership analysis was prepared on behalf of Mel Wheeler, Inc., in support of an application for assignment of WZZU(FM), Lynchburg, Virginia. This analysis considers the attributable radio broadcast stations in the Lynchburg market as it relates to the WZZU facility. This analysis was prepared under the FCC interim contour analysis method.* Considering all attributable radio stations in the area, the following stations were analyzed:

Call Sign	City of License	Facilities
WPLI	Lynchburg, VA	1390 kHz, 4.7 kW-D
WXLK	Roanoke, VA	Ch. 222C, 100 kW, 605 m
WSLC-FM	Roanoke, VA	Ch. 235C, 100 kW, 598 m
WZZU	Lynchburg, VA	Ch. 250C3, 0.57 kW, 587 m
WSLQ	Roanoke, VA	Ch. 256C, 200 kW, 598 m
WVBE-FM	Lynchburg, VA	Ch. 261C3, 20 kW, 100 m

The principal community contours of all of these stations are depicted on a map included herein as Figure 1.[†] The radio multiple ownership analysis considers only those stations with overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations). An ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

* See *Report and Order and Notice of Proposed Rulemaking*, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

[†] Shown for reference on Figure 1 are Mel Wheeler, Inc. attributable stations WVBB(FM), Elliston-Lafayette, VA; WPLY(AM), Roanoke, VA; and WFIR(AM), Roanoke, VA. These stations are not involved in market overlap with the WZZU facility.

Radio Markets

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. As listed in the table below, there are three defined “radio markets” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
1	--	WXLK, WSLC, WZZU, WSLQ
2	--	WSLQ, WZZU, WVBE
3	WPLI	WZZU, WVBE

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations that have principal community contours that intersect the principal community contours that define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations, other than those that form the market in question were not considered in the count of stations in the defined market. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	22 AM; 38 FM; 60 Total
Market 2	22 AM; 36 FM; 58 Total
Market 3	6 AM; 19 FM; 25 Total

Tabulations and maps of the radio stations identified in the defined radio market are included with this statement. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph described in Section 73.184 of the FCC Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the U.S.G.S. 1-second terrain database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

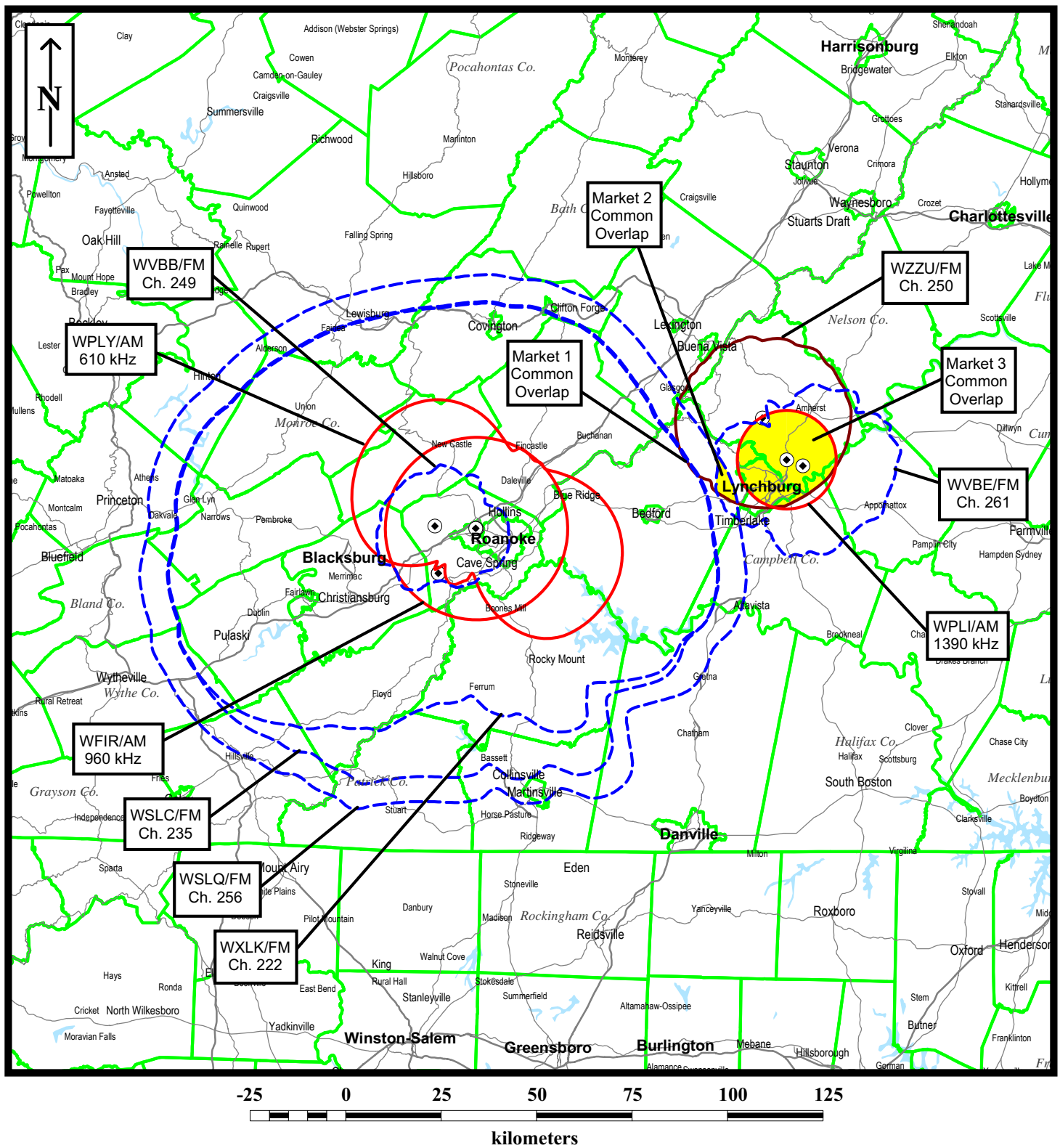
Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.



Louis R. du Treil, Jr.

du Treil, Lundin & Rackley, Inc.
5120 Station Way
Sarasota, Florida 34233-3221

February 22, 2021



PREDICTED PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
LYNCHBURG, VIRGINIA

Call Sign	City	State	Frequency		Call Sign	City	State	Frequency
WLVA	LYNCHBURG	VA	580					
WFNR	BLACKSBURG	VA	710					
WMNA	GRETNA	VA	730					
WSLK	MONETA	VA	880					
WFJX	ROANOKE	VA	910					
WLLL	LYNCHBURG	VA	930					
WGVY	ALTAVISTA	VA	1000					
WBRG	LYNCHBURG	VA	1050					
WKBY	CHATHAM	VA	1080					
WXCF	CLIFTON FORGE	VA	1230					
WGMN	ROANOKE	VA	1240					
WSLW	WHITE SULPHUR SPRING	WV	1310					
WVGM	LYNCHBURG	VA	1320					
WBTM	DANVILLE	VA	1330					
WKEY	COVINGTON	VA	1340					
WBLT	BEDFORD	VA	1350					
WRTZ	ROANOKE	VA	1410					
WAMV	AMHERST	VA	1420					
WMVA	MARTINSVILLE	VA	1450					
WTOY	SALEM	VA	1480					
WKBA	VINTON	VA	1550					
WYTI	ROCKY MOUNT	VA	1570					

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
LYNCHBURG, VIRGINIA

Call Sign	City	State	Channel		Call Sign	City	State	Channel
WRVL	LYNCHBURG	VA	202					
WIQR	LEXINGTON	VA	204					
WVTF	ROANOKE	VA	206					
WWVT-FM	FERRUM	VA	210					
WNRS-FM	SWEET BRIAR	VA	210					
WRXT	ROANOKE	VA	212					
WPIM	MARTINSVILLE	VA	213					
WVRI	CLIFTON FORGE	VA	215					
WQLU	LYNCHBURG	VA	215					
WOKD-FM	DANVILLE	VA	216					
WPAR	SALEM	VA	217					
WEQP	RUSTBURG	VA	219					
WXLK	ROANOKE	VA	222					
WKCJ	WHITE SULPHUR SPRING	WV	227					
WJJS	SALEM	VA	228					
WKHF	LYNCHBURG	VA	229					
WSLC-FM	ROANOKE	VA	235					
WROV-FM	MARTINSVILLE	VA	242					
WWZW	BUENA VISTA	VA	244					
WZZU	LYNCHBURG	VA	250					
WSLQ	ROANOKE	VA	256					
WZBB	STANLEYTOWN	VA	260					
WVHK	CHRISTIANSBURG	VA	264					
WIQO-FM	FOREST	VA	265					
WVMP	VINTON	VA	268					
WAWX	LYNCHBURG	VA	269					
WJVR	IRON GATE	VA	270					
WARJ	SHAWSVILLE	VA	273					
WJJX	APPOMATTOX	VA	274					
WAKG	DANVILLE	VA	277					
WHTU	BIG ISLAND	VA	280					
WSTV	ROANOKE	VA	285					
WKDE-FM	ALTAVISTA	VA	288					
WLNI	LYNCHBURG	VA	290					
WLRX	VINTON	VA	291					
WMNA-FM	GRETN	VA	292					
WZZI	BEDFORD	VA	295					
WYYD	AMHERST	VA	300					

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WKBY	CHATHAM	VA	1080					
WXCF	CLIFTON FORGE	VA	1230					
WGMN	ROANOKE	VA	1240					
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TECHNICAL STATEMENT
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LYNCHBURG, VIRGINIA

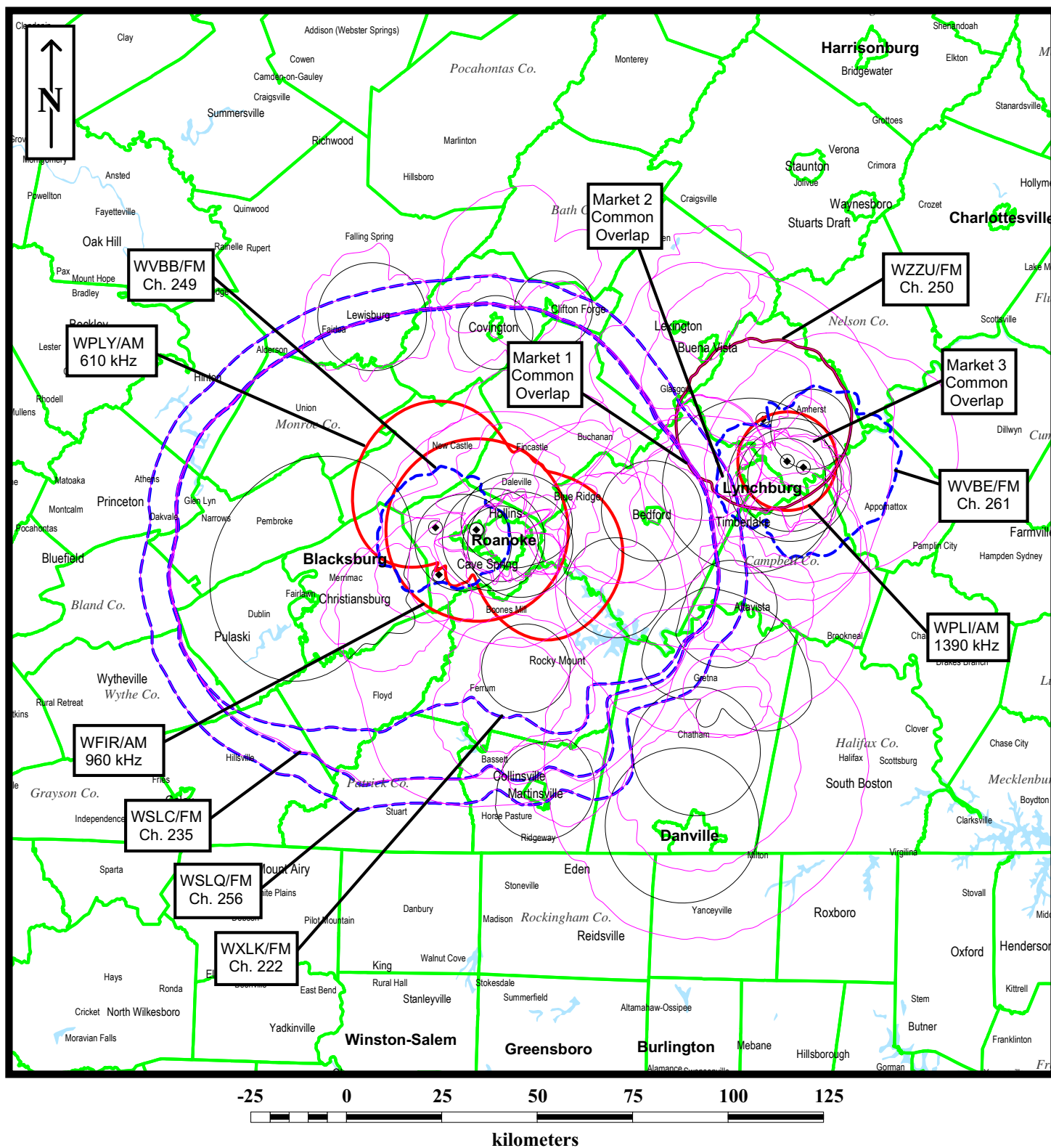
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WTTX-FM	APPOMATTOX	VA	296					
WYYD	AMHERST	VA	300					

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PREDICTED PRINCIPAL COMMUNITY CONTOURS OF MARKET 1 STATIONS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

