

## Multiple Ownership Compliance Exhibit

Community Broadcasters, LLC, owns radio stations in two geographic areas: Upstate New York and South Carolina. This multiple ownership compliance exhibit, therefore, is separated into two sections - one for each of those areas.

### I. The Upstate New York Stations:

Community Broadcasters, LLC is the FCC licensee of the following 8 radio stations in upstate New York:

	<u>Call Sign</u>	<u>Location (City/State)</u>	<u>FCC Facility ID Number</u>
1.	WATN(AM)	WATERTOWN, NEW YORK	11624
2.	WTOJ(FM)	CARTHAGE, NEW YORK	11625
3.	WBDR(FM)	COPENHAGEN, NEW YORK	43748
4.	WEFX(FM)	HENDERSON, NEW YORK	30799
5.	WOTT(FM)	CALCIUM, NEW YORK	166014
6.	WLKF(FM)	GOUVERNEUR, NEW YORK	66658
7.	WQTK(FM)	OGDENSBURG, NEW YORK	66661
8.	WSLB(AM)	OGDENSBURG, NEW YORK	66663

#### A. Watertown, NY Rated Market

The first 5 stations above are listed by BIA as “home” to, and are licensed to communities located within the geographic boundaries of, the Watertown, New York Nielsen radio market. The other three Upstate New York stations subject to this application are not listed as “home” to or licensed within the geographic boundaries of, any Nielsen market, and will be addressed in the next subsection of this Exhibit. As shown in the attached FCC Geographic Market Definition for Watertown, NY ([Attachment A](#) to this Exhibit), the Watertown market contains 18 full-power stations. Under section 73.3555(a)(1)(iii) of Commission’s multiple ownership rules, an entity may hold interests in up to 6 radio stations, including 4 in the same service, if the radio market includes a total of between 15 and 29 full-power stations. As a result, the ownership, by Community Broadcasters, LLC, of 1 AM and 4 FM stations complies with the local radio ownership rule in the Watertown, NY rated market.

#### B. The Upstate NY Unrated Market Stations

The remaining 3 Upstate New York stations licensed to Community Broadcasters LLC [WLKF(FM), WQTK(FM) and WSLB(FM)] that are the subject of this application are not identified by BIA as “home” to, or licensed any community within the geographic boundaries of, any Nielsen metro market. As a

result, compliance with the multiple ownership rules must also be determined by application of the interim contour overlap methodology. Under that methodology, a market is formed by the overlap of the principal community contours of the stations. The map attached as Attachment B to this Exhibit shows the principal community contours of all 8 of Community Broadcasters stations, in both the Watertown, NY rated market (the five stations to the south) and the other unrated market areas (the three stations to the north).

As shown in the Attachment B map, the principal community contours of the three unrated market stations do not overlap any of the Watertown market stations' principal community contours. Also as shown on the Attachment B map, the principal community contours of station WLKF(FM) stands alone and does not overlap the contours of any other station owned by Community Broadcasters. Therefore WLKF(FM) is not in a market for purposes of the interim contour overlap analysis.

The principal community contours of the last two stations, WQTK(FM) and WSLB(AM), overlap with each other, forming a separate market for the interim contour overlap analysis. As shown on Attachment C to this Exhibit, there are at least 4 stations in which neither Community Broadcasters, LLC nor any person having an interest in Community Broadcaster after the proposed transfer of control is completed have an interest, with principal community contours that intersect the market formed by WQTK(FM) and WSLB(AM) and are licensed with transmitter sites within 92 km of the market. Under section 73.3555(a)(1)(iv) of Commission's multiple ownership rules, in markets with less than 14 full-power commercial and noncommercial radio stations an entity may hold interests in up to 5 radio stations, including 3 in the same service, provided, however, that no person or single entity may have a cognizable interest in more than 50% of the full-power stations in that market. Since Community Broadcasters LLC has only 2 stations in this defined market, out of at least 6 total stations, both the cap and the less-than-50% requirements are met. As a result, Community Broadcasters LLC complies with the local radio ownership rule in the defined interim contour overlap market in Upstate New York.

[The remainder of this page is intentionally blank. Section II of this Exhibit begins on the next page.]

## II. The South Carolina Stations:

Community Broadcasters, LLC is the FCC licensee of the following 16 radio stations in South Carolina:

	<u>Call Sign</u>	<u>Location (City/State)</u>	<u>FCC Facility ID Number</u>
1.	WDKD(AM)	KINGSTREE, SOUTH CAROLINA	15835
2.	WDXY(AM)	SUMTER, SOUTH CAROLINA	55267
3.	WFRK(FM)	QUINBY, SOUTH CAROLINA	183329
4.	WGFG(FM)	BRANCHVILLE, SOUTH CAROLINA	6485
5.	WHYM(AM)	LAKE CITY, SOUTH CAROLINA	24149
6.	WIBZ(FM)	WEDGEFIELD, SOUTH CAROLINA	55268
7.	WOLH(AM)	FLORENCE, SOUTH CAROLINA	73400
8.	WQKI-FM	ORANGEBURG, SOUTH CAROLINA	6484
9.	WSIM(FM)	LAMAR, SOUTH CAROLINA	55269
10.	WWBD(FM)	SUMTER, SOUTH CAROLINA	29140
11.	WWHM(AM)	SUMTER, SOUTH CAROLINA	43833
12.	WWKT-FM	KINGSTREE, SOUTH CAROLINA	15836
13.	WPDT(FM)	COWARD, SOUTH CAROLINA	66643
14.	WLJI(FM)	SUMMERTON, SOUTH CAROLINA	63707
15.	WTQS(AM)	CAMERON, SOUTH CAROLINA	160804
16.	WSPX(FM)	BOWMAN, SOUTH CAROLINA	54503

### A. Florence, South Carolina Rated Market

Stations WDKD(AM), WFRK(FM), WHYM(AM), WOLH(AM), WPDT(FM), WSIM(FM) and WWKT-FM are listed by BIA as “home” to, and are licensed to communities located within the geographic boundaries of, the Florence, South Carolina, Nielsen radio market. As shown in the attached FCC Geographic Market Definition for Florence, SC (Attachment D to this Exhibit), the market contains 21 full-power stations. Under section 73.3555(a)(1)(iii) of Commission’s multiple ownership rules, an entity may hold interests in up to 6 radio stations, including 4 in the same service, if the radio market includes

a total of between 15 and 29 full-power stations. As a result, the ownership of 3 AM and 4 FM stations exceeds by one station the radio ownership cap in the Florence, SC rated market, because Community Broadcasters, LLC owns 7 total stations in that market. A separate Exhibit is attached to this application requesting a waiver of Rule 73.3555(a)(1)(iii).

#### B. South Carolina Interim Contour Overlap Markets

The other 9 stations in South Carolina are not listed as “home” to, or licensed within the geographic boundaries of, any Nielsen market. Attachment E to this Exhibit is a map showing the principal community contours of all 9 of these stations. As is evident on the map, the principal community contours of those 9 stations overlap in two separate areas and form two markets for purposes of the Interim contour overlap analysis that follows. Each of those two overlap markets are discussed separately in the following sub-sections.

##### (1) South Carolina Overlap Market No. 1 (the “Orangeburg” overlap market)

As shown on Attachment F to this Exhibit, the principal community contours of 4 stations [WGFG(FM), WQKI-FM, WTQS(AM) and WSPX(FM)] in the Orangeburg, SC area overlap with each other, forming a separate market for the interim contour overlap analysis. As shown on Attachment G, there are at least 8 other stations in which neither Community Broadcasters, LLC nor any person having an interest in Community Broadcasters, LLC after the proposed transfer of control is completed have an interest, with principal community contours that intersect the principal community contours of Community Broadcasters, LLC’s stations in the Orangeburg overlap market and are licensed with transmitter sites within 92 km of the market. Under section 73.3555(a)(1)(iv) of Commission’s multiple ownership rules, in markets with less than 14 full-power commercial and noncommercial radio stations an entity may hold interests in up to 5 radio stations, including 3 in the same service, provided, however, that no person or single entity may have a cognizable interest in more than 50% of the full-power stations in that market. Since Community Broadcasters LLC has 4 stations in this defined market (3 FMs and 1 AM), and since there are at least 12 total stations in the market, both the caps and the less-than-50% requirements are satisfied. As a result, Community Broadcasters LLC complies with the local radio ownership rule in the defined Orangeburg, SC, interim contour overlap market.

##### (2) South Carolina Overlap Market No. 2 (the “Kingstree/Sumter” overlap market)

As shown on Attachment H to this Exhibit, the principal community contours of 5 stations [WDXY(AM), WIBZ(FM), WWBD(FM), WWHM(AM), and WLFI(FM)] in the Kingstree/Sumter, SC area overlap with each other, forming another separate market for the interim contour overlap analysis. As shown on Attachment I, there are at least 8 other stations in which neither Community Broadcasters, LLC nor any person having an interest in Community Broadcasters, LLC after the proposed transfer of control is completed have an interest, with principal community contours that intersect the principal community contours of Community Broadcasters, LLC’s stations in the Kingstree/Sumter overlap market and are licensed with transmitter sites within 92 km of the market. Under section 73.3555(a)(1)(iv) of Commission’s multiple ownership rules, in markets with less than 14 full-power commercial and noncommercial radio stations an entity may hold interests in up to 5 radio stations, including 3 in the same service, provided, however, that no person or single entity may have a cognizable interest in more than 50% of the full-power stations in that market. Since Community Broadcasters LLC has 5 stations in this defined market (3 FMs and 2 AMs), and since there are at least 13 total stations in the market, both

the cap and the less-than-50% requirements are satisfied. As a result, Community Broadcasters, LLC complies with the local radio ownership rule in the defined Kingstree/Sumter, SC, interim contour overlap market.

Attachment A

BIA Report for Watertown, NY

# FCC Geographic Market Definition for Watertown, NY

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WATN	AM	1240	C	Talk	Watertown, NY	07/02/2003	249	Community Broadcasters LLC	Watertown, NY	Jefferson
WBDR	FM	106.7	C	CHR	Watertown, NY	07/02/2003	249	Community Broadcasters LLC	Copenhagen, NY	Lewis
WBLH	FM	92.5	C	Variety	Watertown, NY	06/11/2008	249	Radioactive LLC	Black River, NY	Jefferson
WCIZ	FM	93.3	C	Clsc Hits	Watertown, NY	07/02/2003	249	Stephens Family Limited Partnership	Watertown, NY	Jefferson
WEFX	FM	100.7	C	Country	Watertown, NY	02/04/2009	249	Community Broadcasters LLC	Henderson, NY	Jefferson
WFRY	FM	97.5	C	Country	Watertown, NY	07/02/2003	249	Stephens Family Limited Partnership	Watertown, NY	Jefferson
WJNY	FM	90.9	NC	Classical	Watertown, NY	07/02/2003	249	Public Broadcasting Council of Central NY Inc	Watertown, NY	Jefferson
WKWV	FM	90.1	NC	ChrsContem	Watertown, NY	07/02/2003	249	Educational Media Foundation	Watertown, NY	Jefferson
WLYK	FM	102.7	C	CHR	Watertown, NY	07/02/2003	249	Border International Broadcasting, Inc	Cape Vincent, NY	Jefferson
WMHI	FM	94.7	NC	Christian	Watertown, NY	07/02/2003	249	Mars Hill Broadcasting Co Inc	Cape Vincent, NY	Jefferson
WNER	AM	1410	C	Sports	Watertown, NY	07/02/2003	249	Stephens Family Limited Partnership	Watertown, NY	Jefferson
WOTT	FM	94.1	C	CIRck/NwRc	Watertown, NY	07/02/2003	249	Community Broadcasters LLC	Calcium, NY	Jefferson
WRVH	FM	89.3	NC	Nws/Tlk/Inf	Watertown, NY	03/16/2012	249	State University of New York	Clayton, NY	Jefferson
WRVJ	FM	91.7	NC	Nws/Tlk/Inf	Watertown, NY	07/02/2003	249	State University of New York	Watertown, NY	Jefferson
WSLJ	FM	88.9	NC	Nws/Tlk/Var	Watertown, NY	07/02/2003	249	Saint Lawrence University	Watertown, NY	Jefferson
WSLZ	FM	88.1	NC	Nws/Tlk/Var	Watertown, NY	09/02/2010	249	Saint Lawrence University	Cape Vincent, NY	Jefferson
WTNY	AM	790	C	News/Talk	Watertown, NY	07/02/2003	249	Stephens Family Limited Partnership	Watertown, NY	Jefferson
WTOJ	FM	103.1	C	AC	Watertown, NY	07/02/2003	249	Community Broadcasters LLC	Carthage, NY	Jefferson

Number of Stations in Geographic Market 18

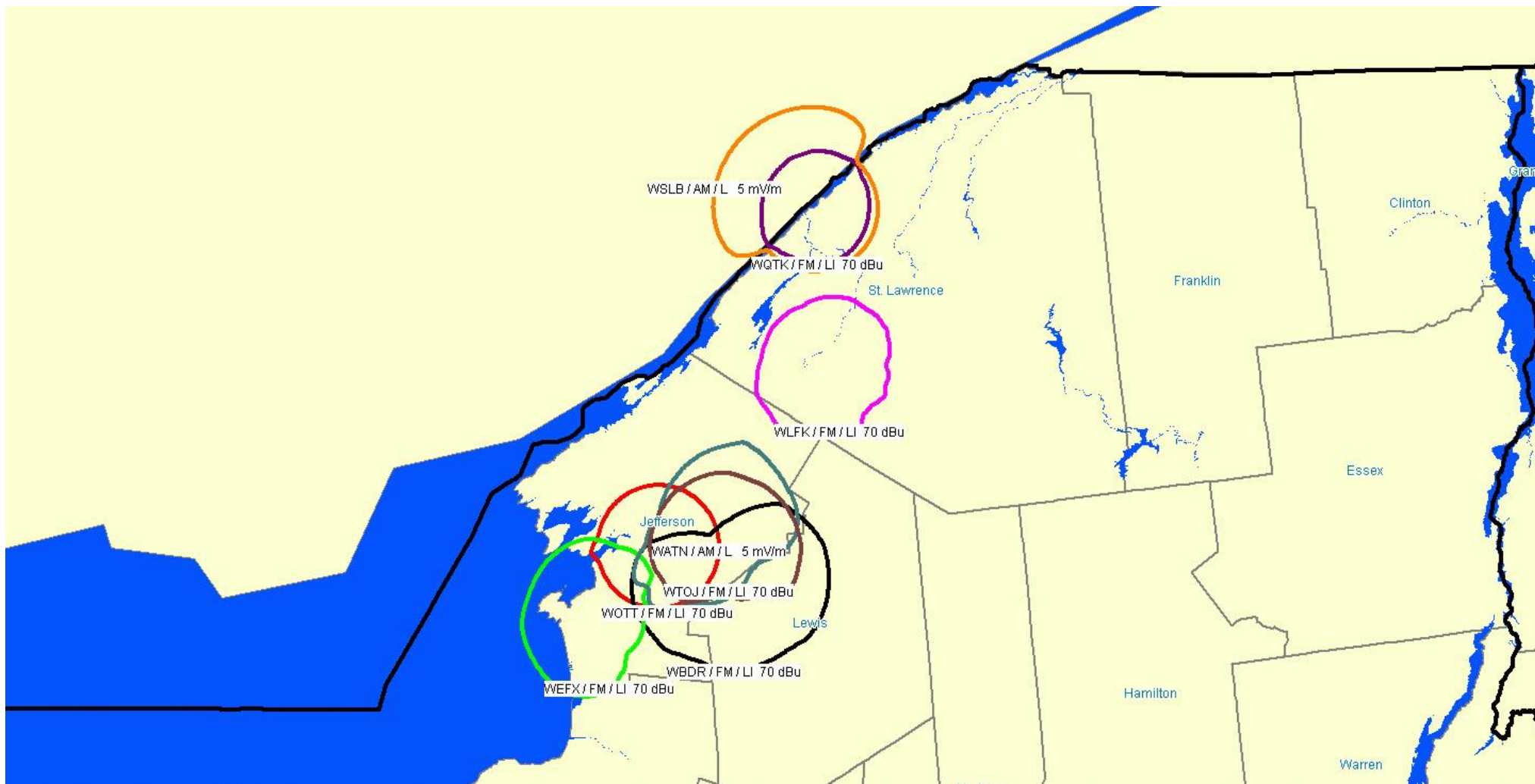
## Previous Stations in Geographic Market

WQTK	FM	92.7	C	Nws/Tlk/Inf		02/02/2006	0	p Score Advertising LLC	Ogdensburg, NY	St Lawrence
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**Attachment B**

Map of all Community Broadcasters, LLC Stations in Upstate New York





BIAMapX:

Latitude: N44-18-9.64

Longitude: W075-35-48.15

BIAMapX Copyright 1995-2007 BIA Financial Network, Inc.

**Station / Service / Status**

 WATN / AM / L  
 WBDR / FM / LI  
 WEFX / FM / LI  
 WLFK / FM / LI  
 WOTT / FM / LI  
 WQTK / FM / LI  
 WSLB / AM / L  
 WTOJ / FM / LI

**Market**

Danbury, CT - Radio  
Metro Fairfield County, CT - Radio  
New Haven, CT - Radio  
Watertown, NY - Radio

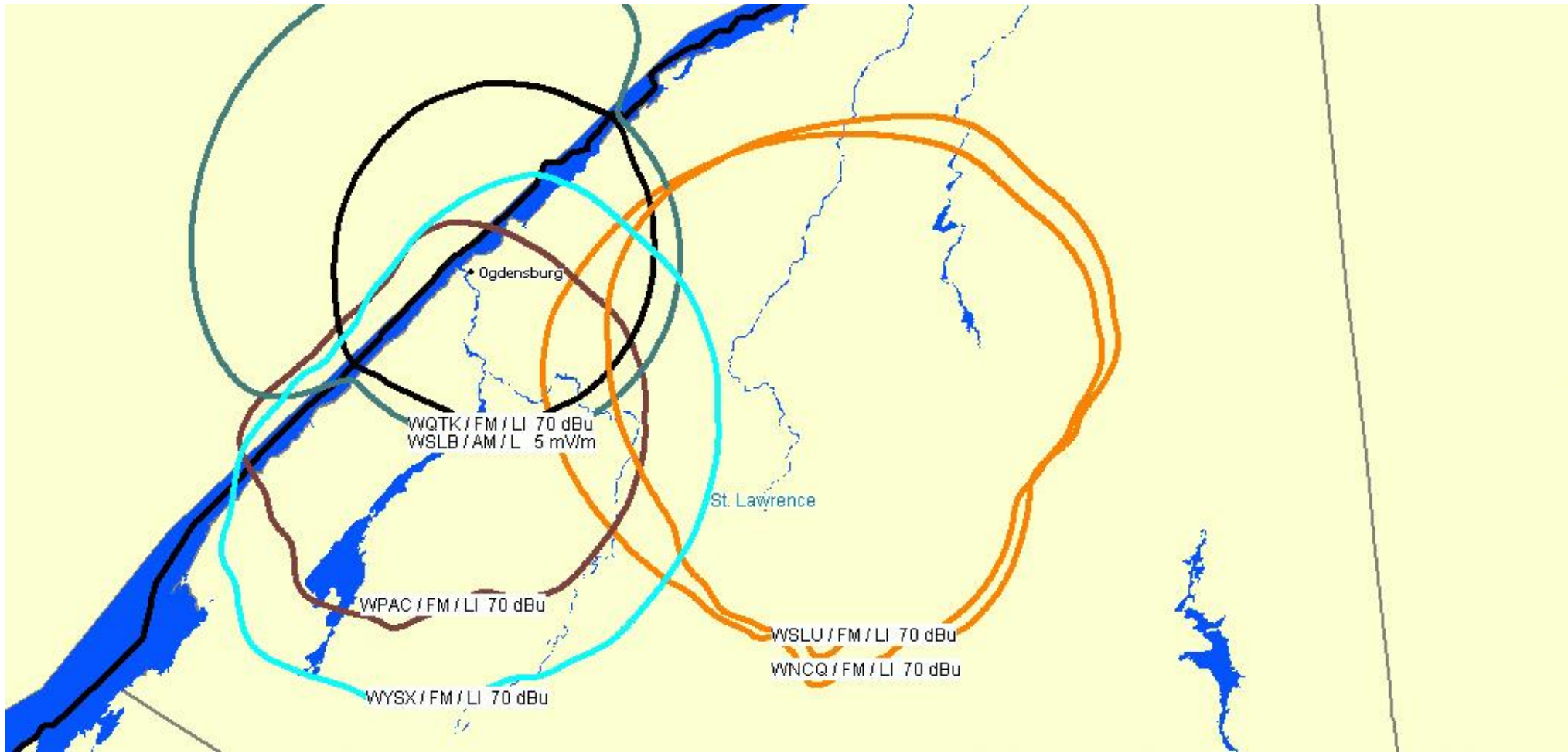
BIAMapX:

Latitude: N44-18-9.64  
Longitude: W075-35-48.15

BIAMapX Copyright 1995-2007 BIA Financial Network, Inc.

**Attachment C**

Map of All Stations Overlapping the Interim Contour Market in Upstate New York



BIAMapX:

Latitude: N44-37-4.31  
Longitude: W075-10-10.35

BIAMapX Copyright 1995-2007 BIA Financial Network, Inc.

**Station / Service / Status**

-  WNCQ / FM / LI
-  WPAC / FM / LI
-  WQTK / FM / LI
-  WSLB / AM / L
-  WSLU / FM / LI
-  WYSX / FM / LI

**Market**

- Burlington-Plattsburgh, VT-NY - Radio
- Nassau-Suffolk, NY - Radio
- Watertown, NY - Radio

**Attachment D**

Florence, South Carolina, BIA Market Report

# FCC Geographic Market Definition for Florence, SC

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WALD	AM	1080	C	Religion	Florence, SC	07/11/2007	207	Glory Communications Inc	Johnsonville, SC	Florence
WBZF	FM	98.5	C	Gospel	Florence, SC	07/02/2003	207	Cumulus Media Holdings Inc	Hartsville, SC	Darlington
WDAR	FM	105.5	C	HpHop/Rhy	Florence, SC	07/02/2003	207	iHeartMedia Inc	Darlington, SC	Darlington
WDKD	AM	1310	C	Sports	Florence, SC	07/02/2003	207	Community Broadcasters LLC	Kingstree, SC	Williamsburg
WEBK	FM	91.1	NC	Oldies	Florence, SC	11/29/2011	207	Richburg Educational Broadcasters Incorporated	Society Hill, SC	Darlington
WEGX	FM	92.9	C	Country	Florence, SC	07/02/2003	207	iHeartMedia Inc	Dillon, SC	Dillon
WFRK	FM	95.3	C	News/Talk	Florence, SC	05/19/2010	207	Community Broadcasters LLC	Quinby, SC	Florence
WHYM	AM	1260	C	News/Talk	Florence, SC	07/02/2003	207	Community Broadcasters LLC	Lake City, SC	Florence
WJMX	AM	1400	C	News/Talk	Florence, SC	07/02/2003	207	iHeartMedia Inc	Darlington, SC	Darlington
WLPG	FM	91.7	NC	Christian	Florence, SC	07/02/2003	207	Augusta Radio Fellowship Institute	Florence, SC	Florence
WMXT	FM	102.1	C	Clsc Hits	Florence, SC	07/02/2003	207	Cumulus Media Holdings Inc	Pamplico, SC	Florence
WOLH	AM	1230	C	Sports	Florence, SC	07/02/2003	207	Community Broadcasters LLC	Florence, SC	Florence
WPDT	FM	105.1	C	Gospl/Inspr	Florence, SC	07/02/2003	207	Community Broadcasters LLC	Coward, SC	Florence
WRZE	FM	94.1	C	Clsc Rock	Florence, SC	05/14/2009	207	iHeartMedia Inc	Kingstree, SC	Williamsburg
WSIM	FM	93.7	C	Hot AC	Florence, SC	02/05/2004	207	Community Broadcasters LLC	Lamar, SC	Darlington
WWFN	FM	100.1	C	Sports	Florence, SC	07/02/2003	207	Cumulus Media Holdings Inc	Lake City, SC	Florence
WWKT	FM	99.3	C	Country	Florence, SC	12/22/2017	207	Community Broadcasters LLC	Kingstree, SC	Williamsburg
WWRK	AM	970	C	Clsc Rock	Florence, SC	07/02/2003	207	iHeartMedia Inc	Florence, SC	Florence
WYNN	FM	106.3	C	Urban CHR	Florence, SC	07/02/2003	207	Cumulus Media Holdings Inc	Florence, SC	Florence
WYNN	AM	540	C	Gospel	Florence, SC	07/02/2003	207	Cumulus Media Holdings Inc	Florence, SC	Florence
WZTF	FM	102.9	C	HpHop/Rhy	Florence, SC	07/02/2003	207	iHeartMedia Inc	Scranton, SC	Florence

Number of Stations in Geographic Market 21

## Previous Stations in Geographic Market

WCMG	FM	94.3	C	Urban AC	01/07/2008	0	Cumulus Media Holdings Inc	Latta, SC	Dillon
WJMX	FM	103.3	C	CHR	02/23/2009	0	iHeartMedia Inc	Cheraw, SC	Chesterfield
WQPD	FM	100.5	C	Hot AC	01/07/2008	0	Cumulus Media Holdings Inc	Marion, SC	Marion
WWBD	FM	94.7	C	Clsc Rock	12/03/2007	0	Community Broadcasters LLC	Sumter, SC	Sumter
WYMB	AM	920	C	Sports	02/09/2005	0	Cumulus Media Holdings Inc	Manning, SC	Clarendon

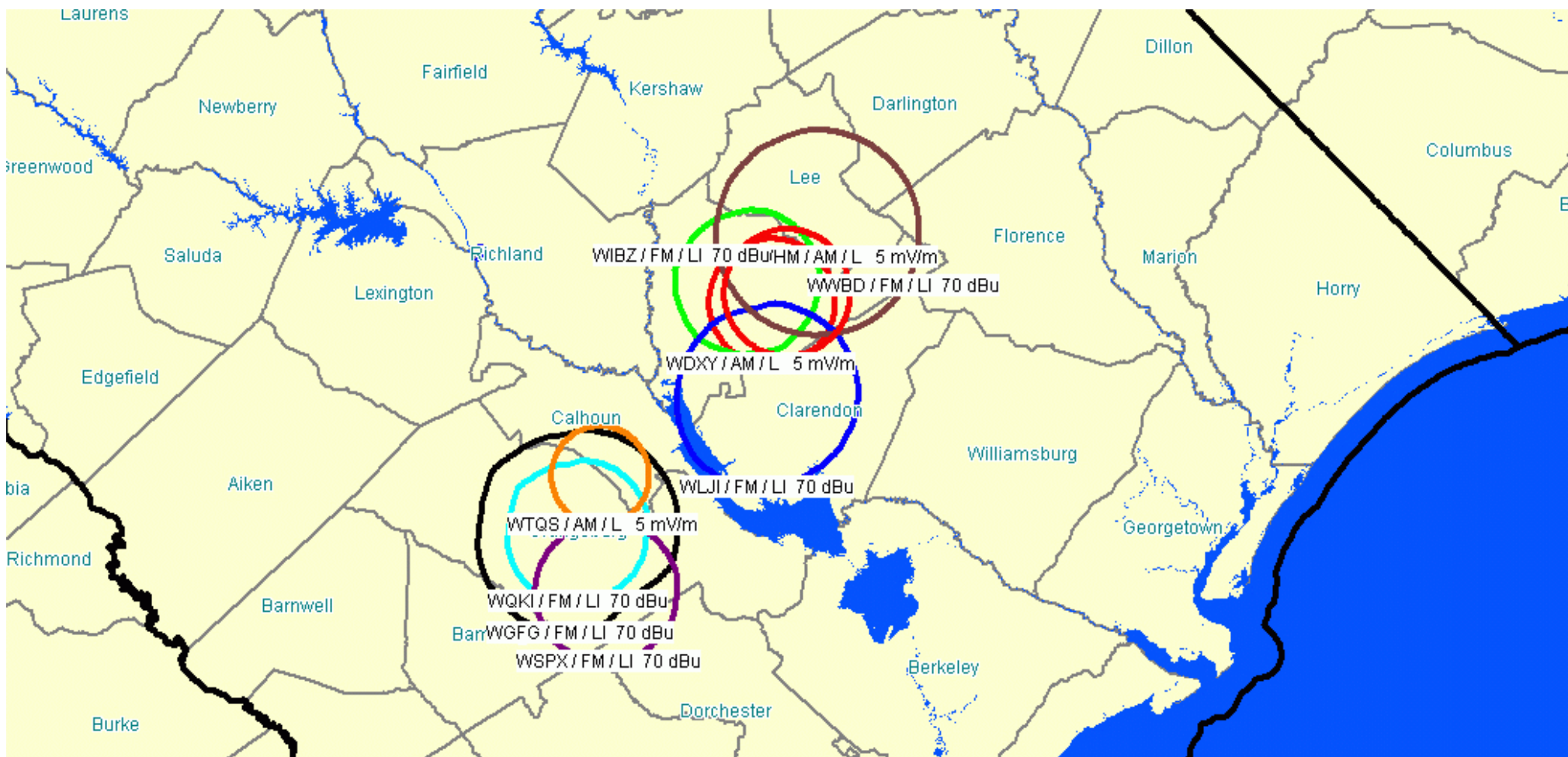
"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

**Attachment E**

Map of Community Broadcaster's Stations Not in the Florence, SC Rated Market





BIAMapX:

Latitude: N33-44-5.07

Longitude: W080-16-35.96

BIAMapX Copyright 1995-2007 BIA Financial Network, Inc.

**Station / Service / Status**

**Market**

-  WDXY / AM / L
-  WGFG / FM / LI
-  WIBZ / FM / LI
-  WLJI / FM / LI
-  WQKI / FM / LI
-  WSPX / FM / LI
-  WTQS / AM / L
-  WWBD / FM / LI
-  WWHM / AM / L

Florence, SC - Radio

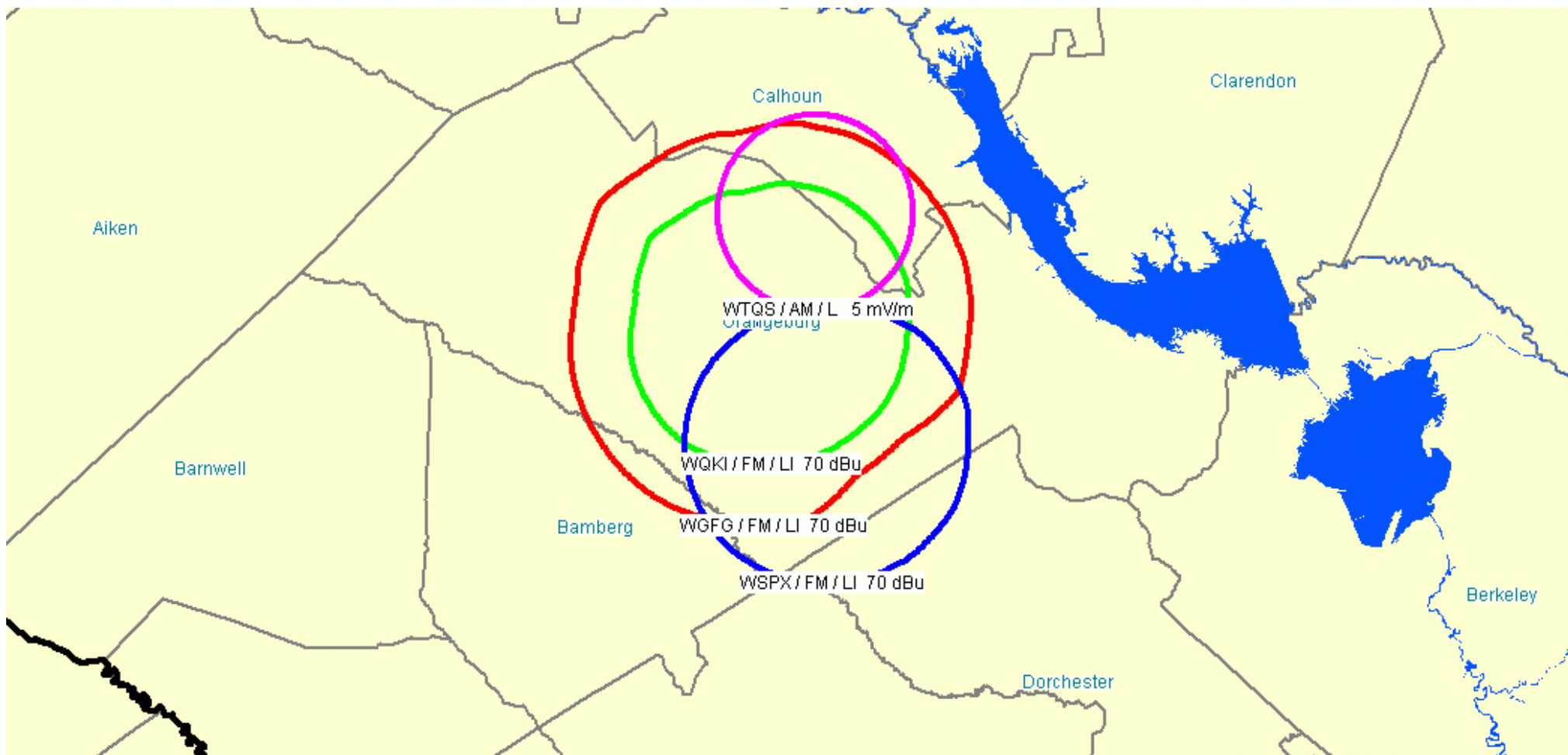
BIAMapX:

Latitude: N33-44-5.07  
Longitude: W080-16-35.96

BIAMapX Copyright 1995-2007 BIA Financial Network, Inc.

**Attachment F**

Map of Community Broadcasters Stations Forming the “Orangeburg” Interim Contour Overlap Market



BIAMapX:

Latitude: N33-22-39.53  
Longitude: W080-46-23.16

BIAMapX Copyright 1995-2007 BIA Financial Network, Inc.

**Station / Service / Status**

-  WGFG / FM / LI
-  WQKI / FM / LI
-  WSPX / FM / LI
-  WTQS / AM / L

**Market**

Florence, SC - Radio

BIAMapX:

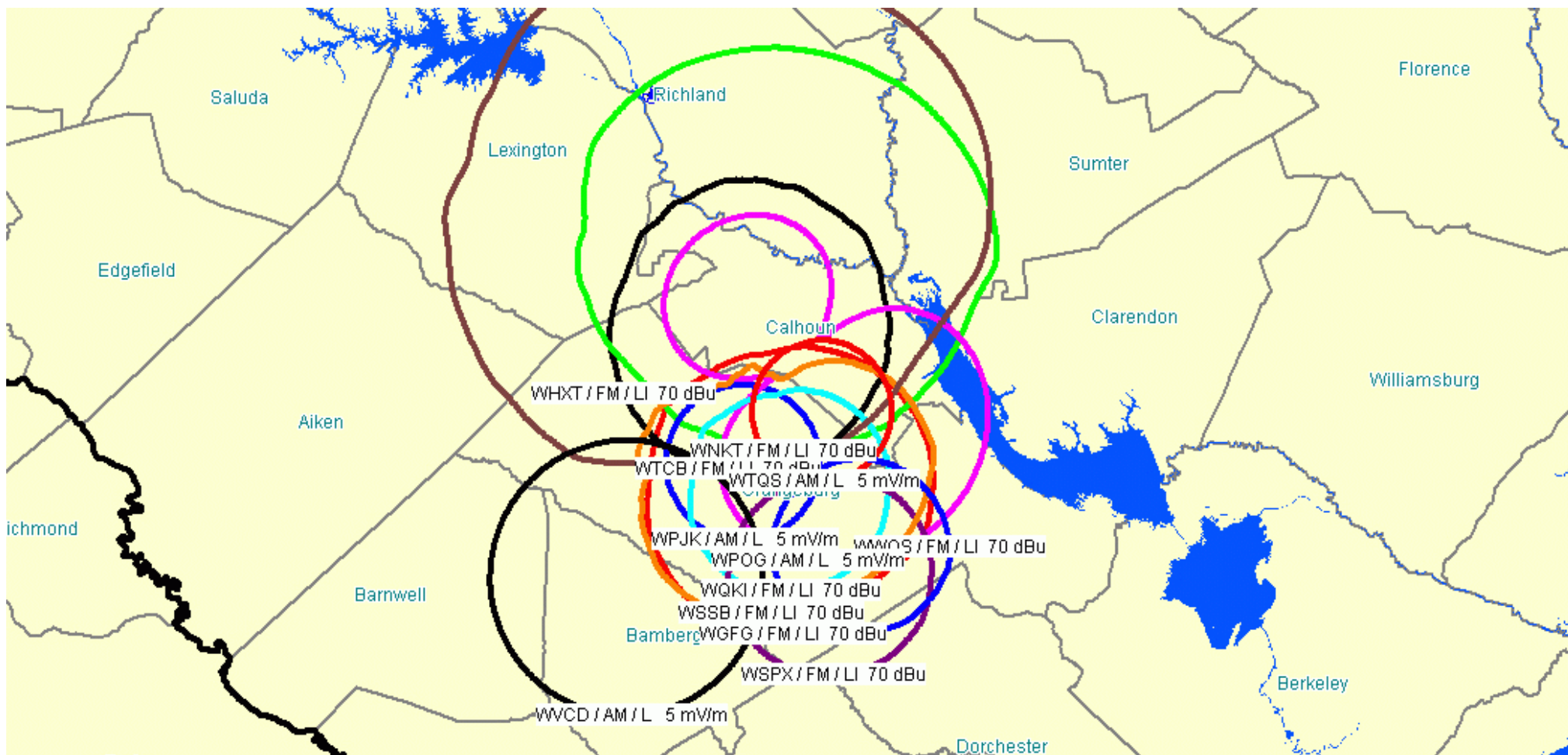
Latitude: N33-22-39.53  
Longitude: W080-46-23.16

BIAMapX Copyright 1995-2007 BIA Financial Network, Inc.

**Attachment G**

Map of All Stations Overlapping the “Orangeburg” Interim Contour Market in South Carolina





BIAMapX:

Latitude: N33-35-26.04  
Longitude: W080-47-46.83

BIAMapX Copyright 1995-2007 BIA Financial Network, Inc.

**Station / Service / Status****Market**

 WGFG / FM / LI  
 WHXT / FM / LI  
 WNKT / FM / LI  
 WPJK / AM / L  
 WPOG / AM / L  
 WQKI / FM / LI  
 WSPX / FM / LI  
 WSSB / FM / LI  
 WTCB / FM / LI  
 WTQS / AM / L  
 WVCD / AM / L  
 WWOS / FM / LI

Charleston, SC - Radio

Columbia, SC - Radio

Florence, SC - Radio

Mobile, AL - Radio

BIAMapX:

Latitude: N33-35-26.04

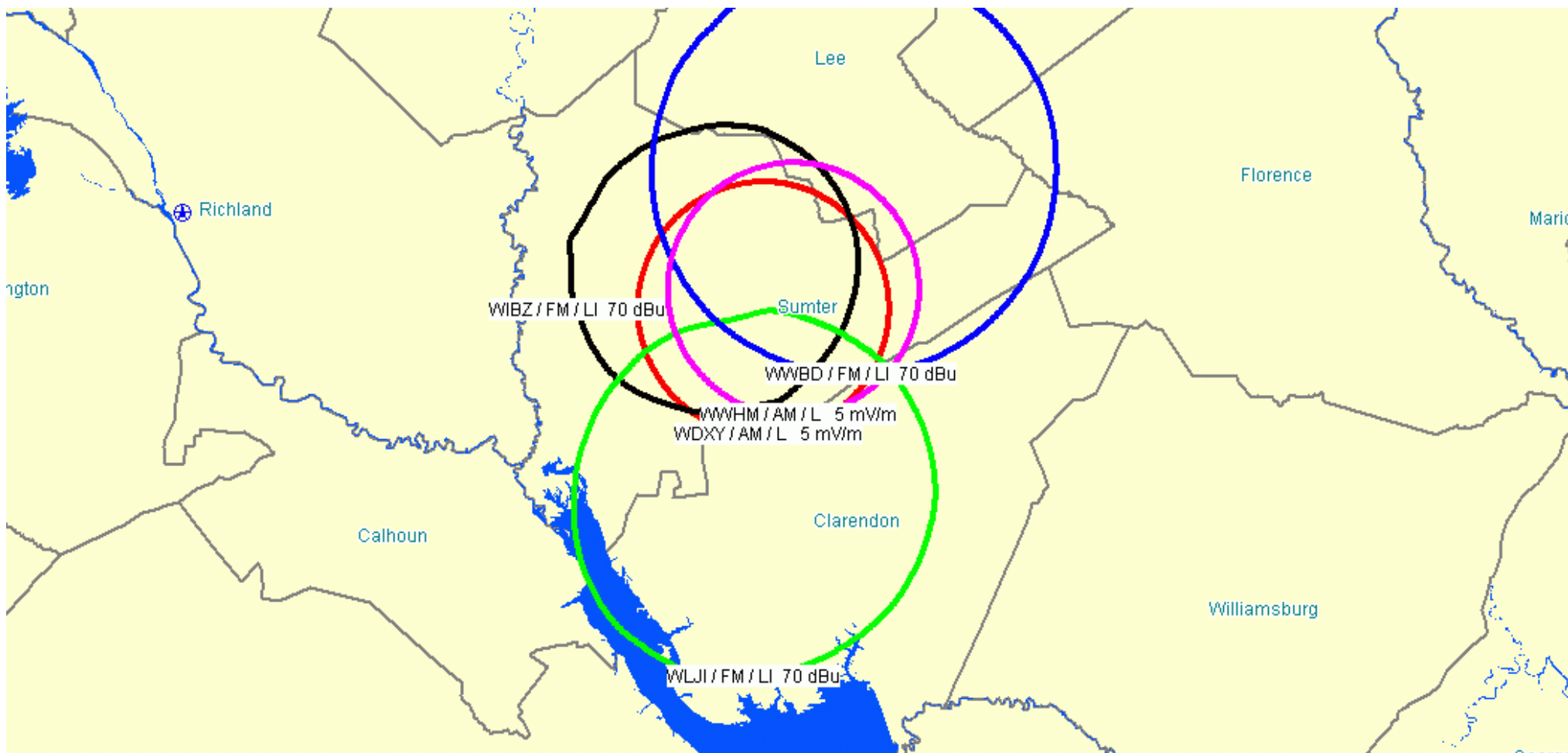
Longitude: W080-47-46.83

BIAMapX Copyright 1995-2007 BIA Financial Network, Inc.



**Attachment H**

Map of Community Broadcasters Stations Forming the “Kingstree/Sumter” Interim Contour Overlap  
Market



BIAMapX:

Latitude: N33-49-42.90  
Longitude: W080-17-35.42

BIAMapX Copyright 1995-2007 BIA Financial Network, Inc.

**Station / Service / Status**

-  WDXY / AM / L
-  WIBZ / FM / LI
-  WLJI / FM / LI
-  WWBD / FM / LI
-  WWHM / AM / L

**Market**

Florence, SC - Radio

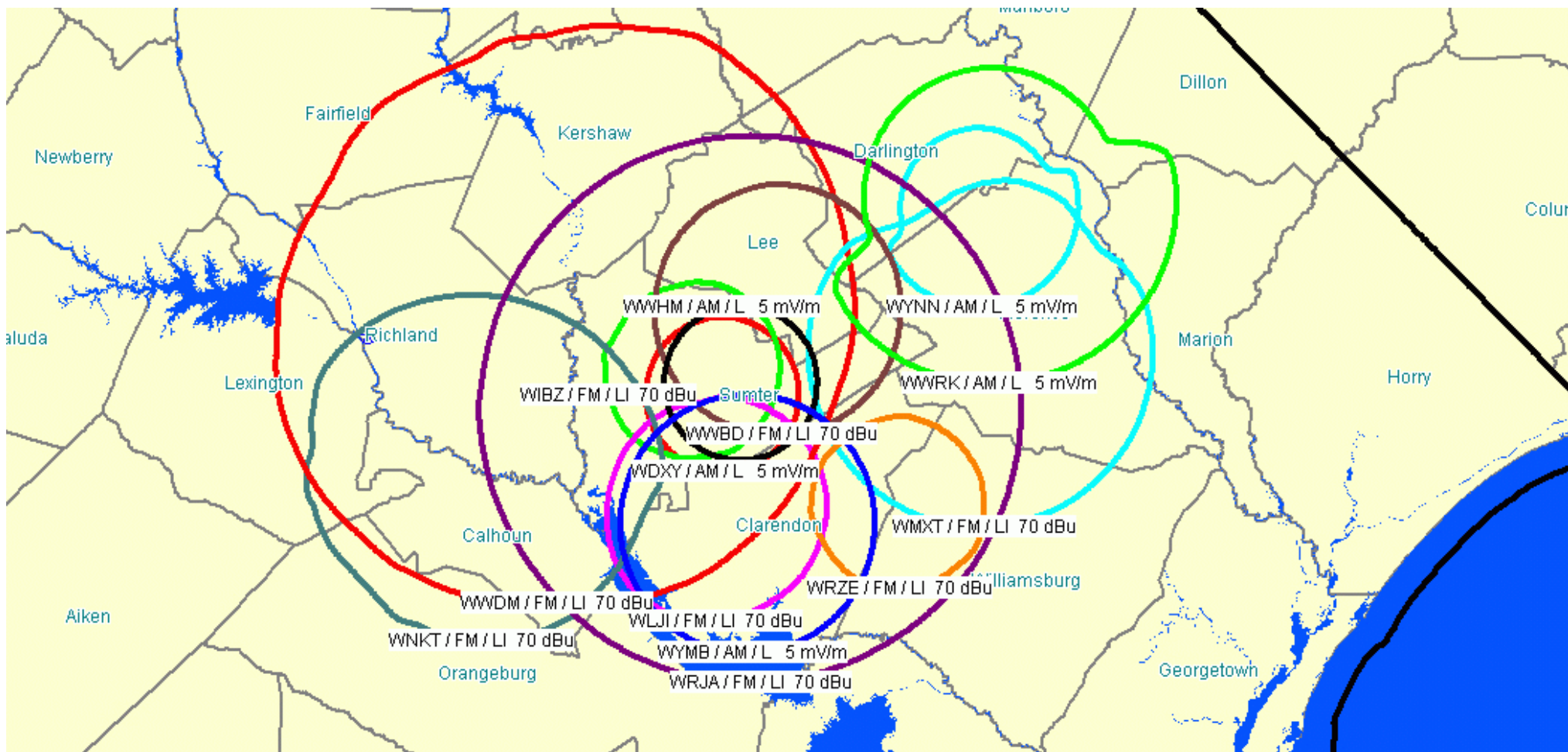
BIAMapX:

Latitude: N33-49-42.90  
Longitude: W080-17-35.42

BIAMapX Copyright 1995-2007 BIA Financial Network, Inc.

**Attachment I**

Map of All Stations Overlapping the “Kingstree/Sumter” Interim Contour Market in South Carolina





BIAMapX:

Latitude: N33-55-29.03  
Longitude: W080-11-27.64

BIAMapX Copyright 1995-2007 BIA Financial Network, Inc.

**Station / Service / Status****Market**

 WDXY / AM / L	Augusta, GA - Radio
 WIBZ / FM / LI	Cape Cod, MA - Radio
 WLJI / FM / LI	Charleston, SC - Radio
 WMXT / FM / LI	Columbia, SC - Radio
 WNKT / FM / LI	Florence, SC - Radio
 WRJA / FM / LI	Myrtle Beach, SC - Radio
 WRZE / FM / LI	
 WWBD / FM / LI	
 WWDM / FM / LI	
 WWHM / AM / L	
 WWRK / AM / L	
 WYMB / AM / L	
 WYNN / FM / LI	

BIAMapX:

Latitude: N33-55-29.03

Longitude: W080-11-27.64

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