

**FCC Section 73.3555(a) Multiple Ownership
Ploener Radio Group, LLC
WFDR-FM Channel 233A Woodbury, Georgia
June 18, 2022**

This statement and attached exhibits were prepared on behalf of Ploener Radio Group, LLC (“Ploener”) licensee of WFDR-FM Channel 233A, Facility ID No. 171035, Woodbury, Georgia. Ploener is filing an FCC Minor Modification Application to modify the license of WFDR-FM to a different transmit location and as such a demonstration of compliance with Section 73.3555(a) of the Commission's multiple ownership rules is required. Ploener is also the licensee of WFDR(AM), Facility ID No. 53678, 1370 kHz, licensed to Manchester, Georgia. Neither WFDR(AM) or WFDR-FM are located in any Nielsen Radio metro county and is not listed as home to any Nielsen Radio rated market. Therefore, a contour overlap study for stations not licensed to metro counties is necessary.

Stations Attributable to the Applicant

Christopher L. Murray, who has an attributable interest in Ploener, licensee of WFDR-FM and WFDR(AM) also has an attributable interest in other full power radio stations within on near 92 kilometers of the WFDR-FM – WFDR(AM) market radio boundary. Those stations are:

WFMX	CH296A	Fac. ID No. 25387	Gordon, GA	WFXM-FM Radio, Inc.
WYPZ(AM)	900 kHz	Fac. ID No. 71216	Macon, GA	Sun Broadcasting, Inc.
WBML(AM)	1350 kHz	Fac. ID No. 67210	Warner Robbins,GA	WRWR-AM Radio LLC
WRWR	CH298A	Fac. ID No. 26626	Cochran, GA	Praise 107.5 FM Radio LLC

None of these stations principal community contours overlap with the WFDR-FM – WFDR AM Radio Market Boundary. Exhibit One is a map showing the principal community contours of WFDR(AM) and WFDR and all other full power AM and FM stations with in 92 kilometers which Murray has an attributable interest. Murray’s attributable interest in these stations is through either ownership interest or a Local Marketing Agreement (LMA).

Defined Radio Market

The combined city grade contours of WFDR(AM) and WFDR-FM create the Defined Radio Market Boundary. The contours used to create the Defined Radio Market Boundary are the FCC F(50,50) 70 dBu for FM stations and the 5.0 mV/M daytime for AM stations. No stations with transmitters more than 92 km from the boundary of the common overlap of subject stations will be considered. Further, no other facility of which the principle shareholders of Ploener have an attributable interest will be considered as a market contributor unless it is a subject station in the radio market under study. A total of 16 full power AM and FM stations with overlapping city grade contours including the two stations that make up the Radio Market Boundary determine the number of stations in the Defined Radio Market.

Exhibit Two is a map showing the principal community contours of WFDR(AM) and WFDR-FM. These two subject stations make up the Defined Radio Market for WFDR-FM. The contours are shown as green and the Defined Market is shaded in green.

Exhibit Three is a map showing the Radio Market Boundary and all the full power AM and FM stations with overlapping contours. The Radio Market Boundary is shaded in light green on the map. A total of 16 stations are shown on the map. Therefore, there are a total of 16 full power AM and FM Radio Stations in the Defined Market. Table One is a tabulation of the stations in Defined Radio Market titled "Table of Contours Shown". The number of stations depicted falls in the 15 to 29 stations level. Therefore, common ownership or control of up to six full power stations with no more than four in the same band is permissible. Ploener would own or have interest in one

FM station and one AM station in the Defined Radio Market. Based on the review of the Defined Radio Market, it is believed that the proposed modification of WFDR-FM is in compliance with §73.3555(a)(iii) of the rules.

The foregoing technical statement was prepared on behalf of Ploener Radio Group, LLC by Donald Lynch of Horizon Broadcast Solutions, LLC, its Technical Consultant. Any information contained herein is true and accurate to the best of my belief and knowledge. All data relating to AM and FM facilities was extracted from the FCC database. Contour overlap studies were created using V-Soft Probe Version 4.194 Professional. We assume no liability for errors or omissions in that database or program which may be adverse to the information contained herein.

WFDR-FM

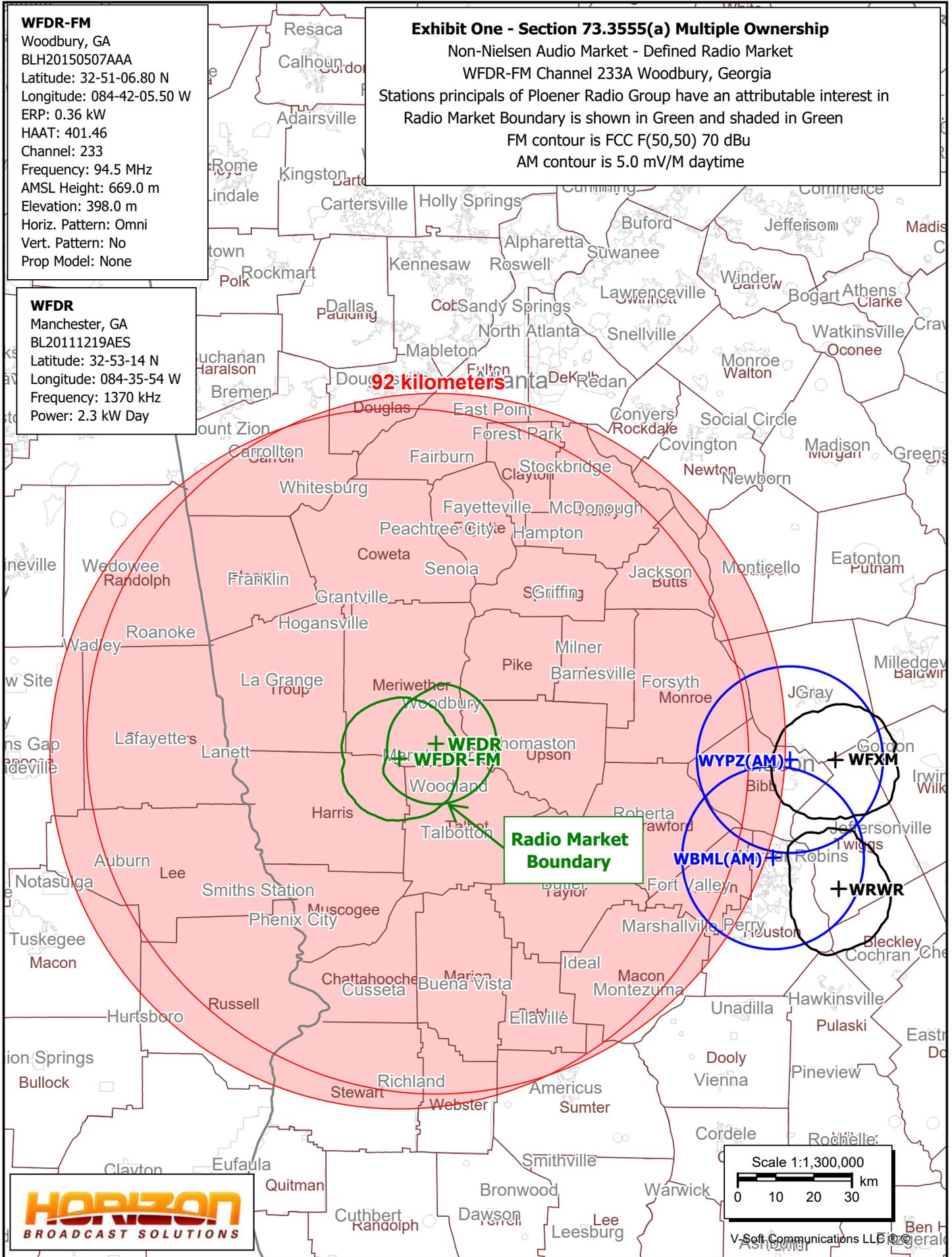
Woodbury, GA
BLH20150507AAA
Latitude: 32-51-06.80 N
Longitude: 084-42-05.50 W
ERP: 0.36 kW
HAAT: 401.46
Channel: 233
Frequency: 94.5 MHz
AMSL Height: 669.0 m
Elevation: 398.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

WFDR

Manchester, GA
BL20111219AES
Latitude: 32-53-14 N
Longitude: 084-35-54 W
Frequency: 1370 kHz
Power: 2.3 kW Day

Exhibit One - Section 73.3555(a) Multiple Ownership

Non-Nielsen Audio Market - Defined Radio Market
WFDR-FM Channel 233A Woodbury, Georgia
Stations principals of Ploener Radio Group have an attributable interest in
Radio Market Boundary is shown in Green and shaded in Green
FM contour is FCC F(50,50) 70 dBu
AM contour is 5.0 mV/M daytime



92 kilometers

+ WFDR
+ WFDR-FM

Radio Market
Boundary

WYPZ(AM) +

+ WFXM

WBML(AM) +

+ WRWR

Scale 1:1,300,000



WFDR-FM

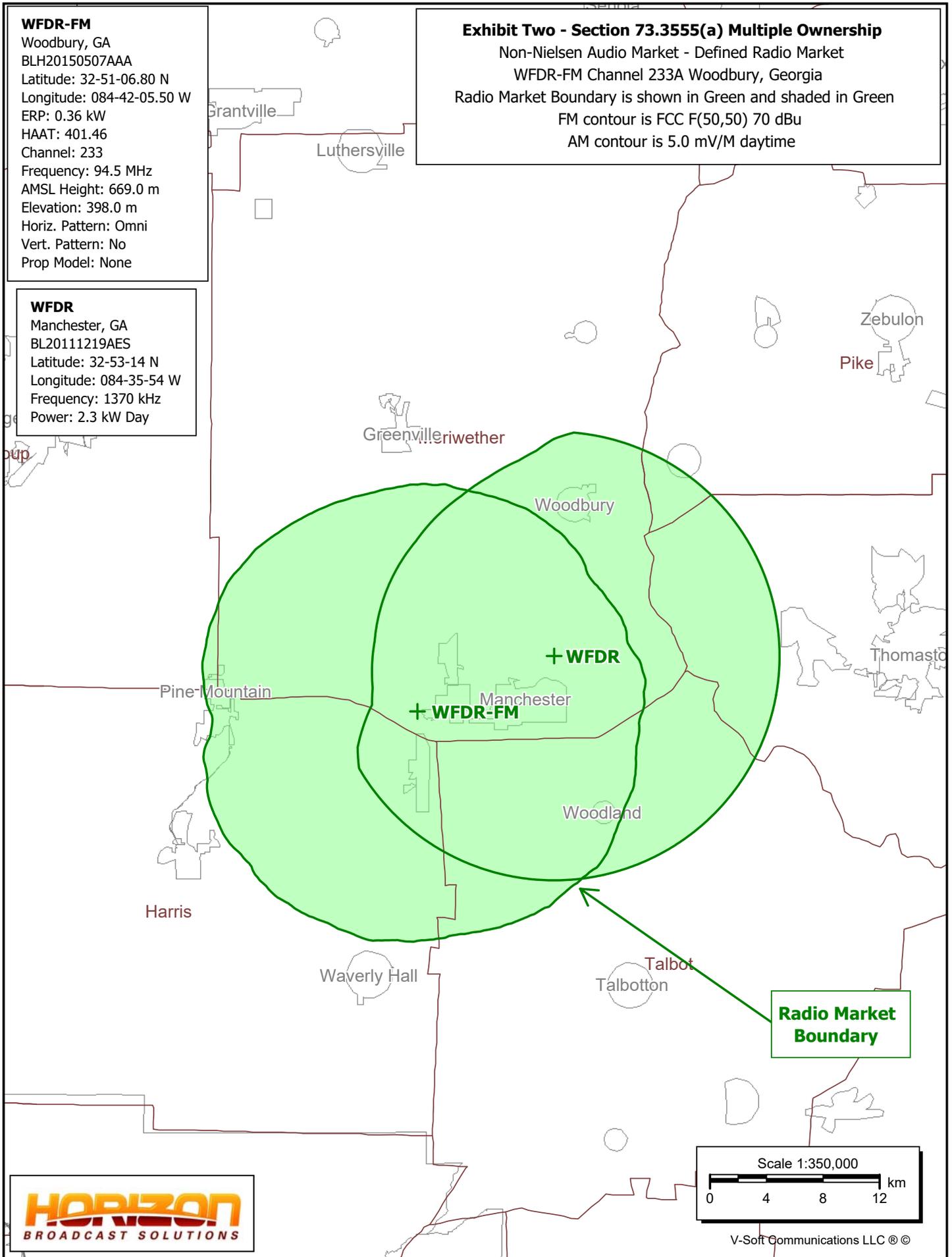
Woodbury, GA
BLH20150507AAA
Latitude: 32-51-06.80 N
Longitude: 084-42-05.50 W
ERP: 0.36 kW
HAAT: 401.46
Channel: 233
Frequency: 94.5 MHz
AMSL Height: 669.0 m
Elevation: 398.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

WFDR

Manchester, GA
BL20111219AES
Latitude: 32-53-14 N
Longitude: 084-35-54 W
Frequency: 1370 kHz
Power: 2.3 kW Day

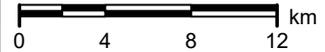
Exhibit Two - Section 73.3555(a) Multiple Ownership

Non-Nielsen Audio Market - Defined Radio Market
WFDR-FM Channel 233A Woodbury, Georgia
Radio Market Boundary is shown in Green and shaded in Green
FM contour is FCC F(50,50) 70 dBu
AM contour is 5.0 mV/M daytime



Radio Market Boundary

Scale 1:350,000



WFDR-FM

Woodbury, GA
BLH20150507AAA
Latitude: 32-51-06.80 N
Longitude: 084-42-05.50 W
ERP: 0.36 kW
HAAT: 401.46
Channel: 233
Frequency: 94.5 MHz
AMSL Height: 669.0 m
Elevation: 398.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

WFDR

Manchester, GA
BL20111219AES
Latitude: 32-53-14 N
Longitude: 084-35-54 W
Frequency: 1370 kHz
Power: 2.3 kW Day

Exhibit Three - Section 73.3555(a) Multiple Ownership

Non-Nielsen Audio Market - Defined Radio Market
WFDR-FM Channel 233A Woodbury, Georgia
Radio Market Boundary is shown in Green and shaded in Green
All other FM station contours are Black
All other AM station contours are Blue

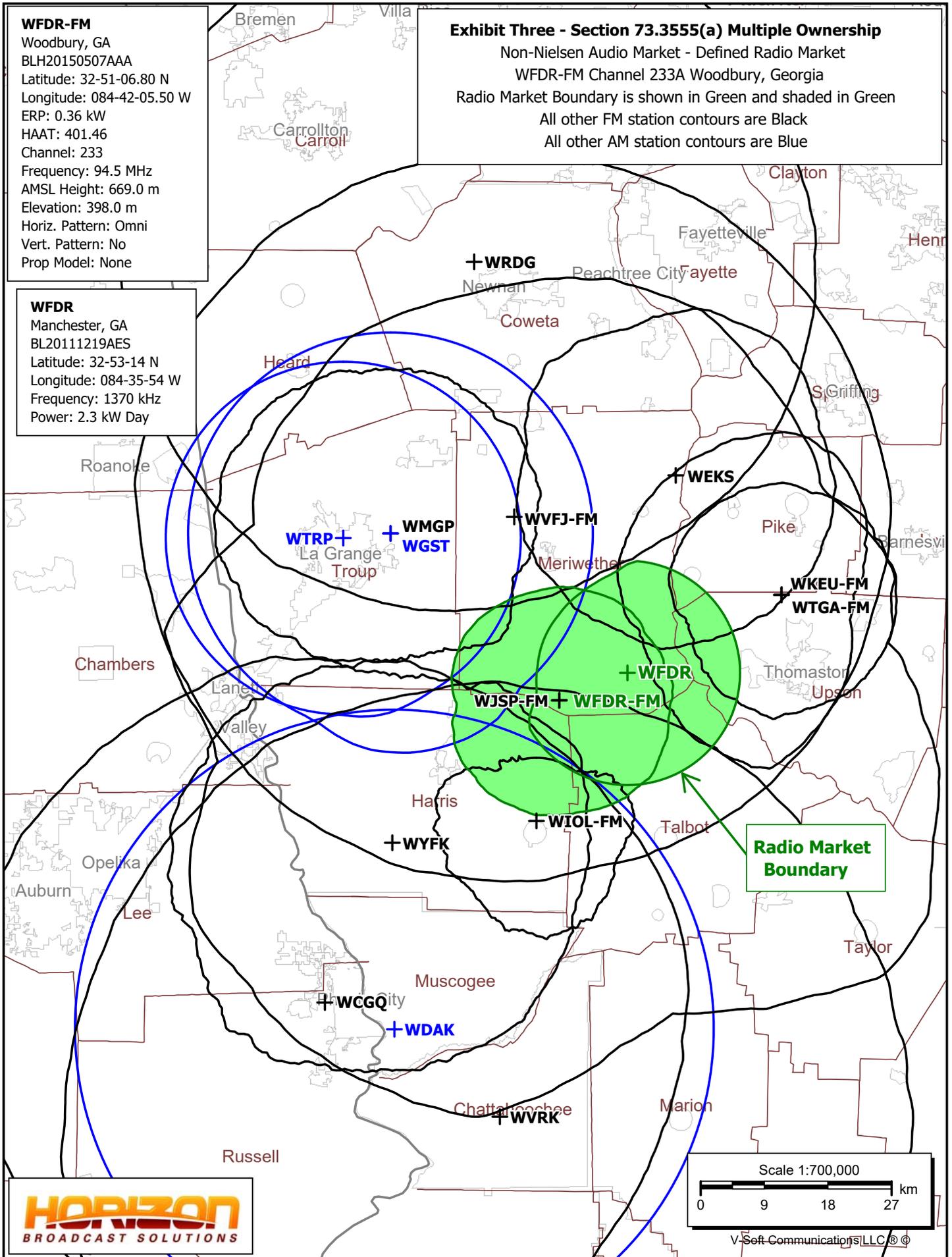


TABLE ONE: TABLE OF STATIONS SHOWN

Total number of overlapping contours: 16 (including two subject stations)

Total stations in Defined Radio Market: 16

Reference: Subject Stations

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WFDR	AM	1370	Manchester	GA	BL20111219AES	0.0	0.0
WFDR-FM	FM	233A	Woodbury	GA	BLH20150507AAA	10.4	247.9

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WJSP-FM	FM	201C	Warm Springs	GA	BLED20131101AGM	10.4	248.1
WKEU-FM	FM	205C2	The Rock	GA	BLED19991215ABA	24.4	63.1
WYFK	FM	208C2	Columbus	GA	0000159040	41.1	234.3
WEKS	FM	223C3	Zebulon	GA	BLH20060714AAC	28.7	13.7
WVFJ-FM	FM	227C0	Greenville	GA	BMLED20190225ABF	27.3	324.1
WIOL-FM	FM	239A	Waverly Hall	GA	BLH20100429AEB	24.6	211.6
WMGP	FM	251C3	Hogansville	GA	BLH19990927AAJ	38.8	300.6
WTGA-FM	FM	266A	Thomaston	GA	BLH20080313ABF	24.5	63.0
WVRK	FM	275C	Columbus	GA	BLH20140115AAE	65.3	196.1
WRDG	FM	287C1	Bowdon	GA	BLH20020220AAB	62.0	339.7
WCGQ	FM	297C0	Columbus	GA	BMLH20070118ABW	63.3	222.7

Total Other FM Stations: 11

WDAK	AM	540	COLUMBUS	GA	BL20061108AJK	60.3	213.3
WTRP	AM	620	LA GRANGE	GA	BL20070228AIY	44.4	295.5
WGST	AM	720	HOGANSVILLE	GA	BL19930601AD	38.8	300.6

Total Other AM Stations: 3

Distance and bearing calculations from coordinates: 32-53-14 N, 084-35-54 W

Duopoly Options:

TV: Not Included

FM: 3.16 mV/m (70 dBu); Include NCE

AM: 5.0 mV/m

Stations more than 92 km from the common area were excluded.