

Engineering Statement
RADIO MULTIPLE OWNERSHIP STUDY
prepared for
Dick Broadcasting Company, Inc. of Tennessee

Introduction

Dick Broadcasting Company, Inc. of Tennessee (“Dick Broadcasting”) presently has attributable ownership interest in thirteen (13) radio stations licensed to communities North and South Carolina. Dick Broadcasting is proposing to acquire six (6) radio stations in a separate area on the South Carolina/Georgia border from Alpha Media Licensee LLC (“Alpha Media”). Dick Broadcasting herewith submits information demonstrating compliance with Section 73.3555(a) of the Commission’s rules with regard to the proposed assignment of licenses of six stations from Alpha Media. The instant Engineering Statement has been prepared using information provided by Dick Broadcasting and its representatives. Dick Broadcasting’s now consist of the following stations:

WRNN(AM), Myrtle Beach, SC Fac. Id: 24775	WQSL(FM), Jacksonville, NC Fac. Id: 28171
WRNS(AM), Kinston, NC Fac. Id: 36944	WQZL(FM), Belhaven, NC Fac. Id: 47883
WERO(FM), Washington, NC Fac. Id: 64609	WRNN-FM, Socastee, SC Fac. Id: 53949
WKRR(FM), Asheboro, NC Fac. Id: 16892	WRNS-FM, Kinston, NC Fac. Id: 36950
WKZL(FM), Winston-Salem, NC Fac. Id: 16891	WXQR-FM, Jacksonville, NC Fac. Id: 28172
WKZQ-FM, Forestbrook, SC Fac. Id: 13890	WYAV(FM), Myrtle Beach, SC Fac. Id: 36947
WMYB(FM), Myrtle Beach, SC Fac. Id: 27265	

The six stations Dick Broadcasting is seeking consent to the assignment of license for are:

WHHW(AM), Hilton Head Island, SC Fac. Id: 48366	WRWN(FM), Port Royal, SC Fac. Id: 72387
WFXH-FM, Hilton Head Island, SC Fac. Id: 48367	WUBB(FM), Bluffton, SC Fac. Id: 16844
WGCO(FM), Midway, GA Fac. Id: 11674	WXYX(FM), Rincon, GA Fac. Id: 54805

The Commission issued a Report and Order and Notice of Proposed Rulemaking (“R&O”)¹ that deals with compliance with its multiple ownership rules. The R&O establishes a means of evaluating local radio station multiple ownership issues utilizing existing Nielsen Audio^{®2} and BIA[®] MEDIA

¹ Report and Order in MB Docket No. 02-277 and MM Docket Nos. 01-235, 01-317, and 00-244, and Notice of Proposed Rulemaking for MB Docket 03-130 FCC-03-127, (released July 2, 2003).

² Nielsen Audio is a registered mark of Nielsen Holdings, N.V.

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Access Pro^{TM3} market data for analyses of markets with established geographic boundaries.⁴ There is a separate “interim” means for evaluating radio station multiple ownership issues beyond established Nielsen Audio radio markets. In cases where a station is not geographically within a Nielsen Audio boundary but is declared “home” to a Nielsen Audio market, ownership concentration must be studied using both the interim and the BIA methods.

Pursuant to §73.3555(a) of the Commission’s Rules, the number of stations that a licensee may own is based on the total number of stations in that particular market, regardless of the study methodology employed. There is also a subcap on how many stations each licensee may own in any one service (AM or FM).

- Markets with 45 or more stations are limited to 8 total stations and 5 in any one service.
- Markets with 30-44 stations are limited to 7 total stations and 4 in any one service.
- Markets with 15-29 stations are limited to 6 total stations and 4 in any one service.
- Markets with 14 or fewer stations are limited to 5 total stations and 3 in any one service, but not more than 50% of the market stations.

A hybrid circumstance requiring application of both the defined geographic market and interim contour overlap methods is necessary for this proposed assignment. Provided as **Attachment 1** is a copy of the BIA List of Stations in the BIA defined, FCC Geographic Market Definition for Savannah, Georgia. Four (4) of the Alpha Media stations are part of the FCC Defined Geographic market for Savannah, GA. The other two, WHHW(AM) and WRWN(FM), while not listed in the Savannah market, share principal community contour overlap with some of the Alpha Media stations in the Savannah market. Attached as **Map Figure 1** is an illustration of the principal community contours of the licensed and authorized Dick Broadcasting AM and FM stations listed herein along with those of the Alpha Media stations referenced herein. As noted on **Attachment 1** and illustrated by **Map Figure 1**, Dick Broadcasting does not have attributable ownership in any Savannah, GA stations or any stations in close proximity to those of Alpha Media stations it is proposing to acquire.

³ MEDIA Access Pro is a trademark of BIA® Financial Network Inc.

⁴ As an initial matter, the geographical boundaries of a market are established by reference to the boundaries of the markets established by Nielsen Audio. Within that market, the FCC requires that the BIA count of stations operating in the market be employed.

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BIA – Geographic Market Method

Attachment 1 shows a total of twenty-four (24) AM and FM radio stations listed as being part of the Savannah, Georgia defined geographic radio market. Dick Broadcasting’s proposed assignment of four (4) FM stations in a defined geographic market complies with FCC radio multiple ownership rules permitting attributable ownership interest in as many as 6 total stations and 4 in any one service in a market of 24 total stations (§73.3555(a)(iii)).

Interim Method - Introduction

Under the current Rules, any station with a principal community beyond the geographic boundary of a defined geographic radio market shall be studied under the Commission’s “interim,” contour overlap methodology. A “market” is defined as the area encompassed by the principal community contours of radio stations for which common ownership is proposed⁵ and which have a mutual area of principal community contour overlap.

Interim Method – The Markets

Map Figure 1 illustrates the distribution of the Dick Broadcasting stations and that there are no existing stations in proximity to those it proposes to acquire. As shown in greater detail with **Map Figures 2, 3 and 4** the principal community contours of the six stations Dick Broadcasting proposes to add listed herein have three instances of unique principal community contour overlap if licensed facilities are considered and two other instances of unique principal community contour overlap if the WXYF(FM) construction permit is considered instead of the licensed WXYF(FM) facility.

The common overlap area of AM and FM stations constitutes the “core” of the Market. There are five instances of unique common principal community contour overlap warranting consideration

⁵ Order in Implementation of Sections 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Red 6387, 6395 para. 39 (1992).

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for FCC radio multiple ownership purposes. The core common overlap areas are shaded green in **Map Figure 3** for the licensed WXYX(FM) facility and in **Map Figure 4** for the WXYX(FM) CP facility.

Map Figure 5 illustrates that an “interim-contour overlap” study of Licensed Market 1 with five (5) commonly owned stations (1 AM and 4 FM) identifies thirty-one (31) operating commercial and noncommercial stations with principal community contours that may be counted to overlap some portion of the Market, as defined by the licensed stations. Of the thirty-one (31) stations, five (5) share common overlap and will have ownership interests attributable to Dick Broadcasting. All stations shown have transmitter locations that are situated less than 92 km from the nearest edge of the mutual principal community contour overlap. The proposed ownership of these stations by Dick Broadcasting - Licensed Market 1 (WHHW(AM), WFXH-FM, WRWN(FM), WUBB(FM) & WXYX(FM)(Lic.), complies with Section 73.3555(a)(ii) of the FCC Rules: *“Markets with 30-44 stations are limited to 7 total stations and 4 in any one service.”*

Map Figure 6 illustrates that an “interim-contour overlap” study of Licensed Market 2 with three (3) commonly owned stations (1 AM and 2 FM) identifies forty-four (44) operating commercial and noncommercial stations with principal community contours that may be counted to overlap some portion of the Market, as defined by the licensed stations. Of the forty-four (44) stations, three (3) share common overlap and will have ownership interests attributable to Dick Broadcasting. All stations shown have transmitter locations that are situated less than 92 km from the nearest edge of the mutual principal community contour overlap. The proposed ownership of these stations by Dick Broadcasting - Licensed Market 2 (WHHW(AM), WGCO(FM) & WUBB(FM) complies with Section 73.3555(a)(ii) of the FCC Rules: *“Markets with 30-44 stations are limited to 7 total stations and 4 in any one service.”*

Map Figure 7 illustrates that an “interim-contour overlap” study of Licensed Market 2 with three (3) commonly owned stations (3 FM) identifies forty-one (41) operating commercial and

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noncommercial stations with principal community contours that may be counted to overlap some portion of the Market, as defined by the licensed stations. Of the forty-one (41) stations, three (3) share common overlap and will have ownership interests attributable to Dick Broadcasting. All stations shown have transmitter locations that are situated less than 92 km from the nearest edge of the mutual principal community contour overlap. The proposed ownership of these stations by Dick Broadcasting - Licensed Market 3, (WGCO(FM), WUBB(FM) & WXYX(FM)(Lic.) complies with Section 73.3555(a)(ii) of the FCC Rules: “Markets with 30-44 stations are limited to 7 total stations and 4 in any one service.”

Considering the Construction Permit for WXYX(FM) instead of the Licensed Facility

Map Figure 8 illustrates that an “interim-contour overlap” study of CP Market 1 with five (5) commonly owned stations (1 AM and 4 FM) identifies thirty-one (31) operating commercial and noncommercial stations with principal community contours that may be counted to overlap some portion of the Market, as defined by the licensed stations. Of the thirty-one (31) stations, five (5) share common overlap and will have ownership interests attributable to Dick Broadcasting. All stations shown have transmitter locations that are situated less than 92 km from the nearest edge of the mutual principal community contour overlap. The proposed ownership of these stations by Dick Broadcasting - CP Market 1, (WHHW(AM), WFXH-FM, WRWN(FM), WUBB(FM) & WXYX(FM)(CP), complies with Section 73.3555(a)(ii) of the FCC Rules: “Markets with 30-44 stations are limited to 7 total stations and 4 in any one service.” It should be noted that the principal community contour of the authorized CP for WXYX(FM) is considered for the stations count for **Map Figures 8 & 9.**

Map Figure 9 illustrates that an “interim-contour overlap” study of CP Market 2 with four (4) commonly owned stations (1 AM and 3 FM) identifies forty-five (45) operating commercial and noncommercial stations with principal community contours that may be counted to overlap some portion of the Market, as defined by the licensed stations. Of the forty-five (45) stations, four (4) share common overlap and will have ownership interests attributable to Dick Broadcasting. All stations shown have transmitter locations that are situated less than 92 km from the nearest edge of

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the mutual principal community contour overlap. The proposed ownership of these stations by Dick Broadcasting - CP Market 2, (WHHW(AM), WGCO(FM), WUBB(FM) & WXYX(FM)(CP) complies with Section 73.3555(a)(ii) of the FCC Rules: “*Markets with 30-44 stations are limited to 7 total stations and 4 in any one service. ... Markets with 45 or more stations are limited to 8 total stations and 5 in any one service.*”

Methodology Summary

In preparing the attached maps and tables, pertinent station data were extracted from the Commission's engineering databases. For AM stations, these included the operating power, radiation efficiency, directional antenna data (where appropriate), and geographic coordinates. The distances to the 5 mV/m contours were then determined using the digitized version of the *Atlas of Ground Conductivity* published in 1981 by the International Telecommunication Union along with a computer program which simulates the FCC's AM groundwave propagation curves. For the FM stations, pertinent data for determining the distances to the contour included the antenna elevation above mean sea level, geographic coordinates, effective radiated power, and, where appropriate, directional antenna patterns. The requisite 3.16 mV/m (70 dB μ) contours were determined using digitized 3 arc-second U.S.G.S. terrain data along radials spaced every degree from the transmitter site and an implementation of the Commission's TVFMFS computer program which simulates the FM propagation curves. The detailed distances to the principal community contours were then used with a GIS mapping program to generate the attached maps.

Conclusion

As shown herein, Dick Broadcasting's proposed assignment of six stations from Alpha Media (WHHW(AM), WGCO(FM), WFXH-FM, WRWN(FM), WUBB(FM) & WXYX(FM) complies with §73.3555(a) of the Commission's Rules regarding the local multiple ownership of radio stations.

FCC Geographic Market Definition for Savannah, GA

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market		City & State of License	County of License
							Designntn Date	Home Mkt Rank		
WAEV	FM	97.3	C	CHR	Savannah, GA	07/02/2003	145	iHeartMedia Inc	Savannah, GA	Chatham
WEAS	FM	93.1	C	Urban	Savannah, GA	07/02/2003	145	Cumulus Media Holdings Inc	Springfield, GA	Effingham
WFXH	FM	106.1	C	Rock	Savannah, GA	07/06/2018	145	New Alpha	Hilton Head Island, SC	Beaufort
WGCO	FM	98.3	C	CHR	Savannah, GA	07/02/2003	145	New Alpha	Midway, GA	Liberty
WHCJ	FM	90.3	NC	Variety	Savannah, GA	07/02/2003	145	Savannah State University	Savannah, GA	Chatham
WIXV	FM	95.5	C	Clisc Rock	Savannah, GA	07/02/2003	145	Cumulus Media Holdings Inc	Savannah, GA	Chatham
WJCL	FM	96.5	C	Country	Savannah, GA	08/25/2016	145	Cumulus Media Holdings Inc	Savannah, GA	Chatham
WKZV	FM	102.1	NC	ChrsContem	Savannah, GA	07/02/2003	145	Educational Media Foundation	Tybee Island, GA	Chatham
WLFS	FM	91.9	NC	ChrsContem	Savannah, GA	07/02/2003	145	Radio Training Network, Inc	Port Wentworth, GA	Chatham
WL VH	FM	101.1	C	HpHop/Rhy	Savannah, GA	07/19/2011	145	iHeartMedia Inc	Hardeeville, SC	Jasper
WLXP	FM	88.1	NC	Chrst/Altve	Savannah, GA	07/02/2003	145	Christian Multimedia Network Inc	Savannah, GA	Chatham
WQBT	FM	94.1	C	HpHop/Rhy	Savannah, GA	07/02/2003	145	iHeartMedia Inc	Savannah, GA	Chatham
WRHQ	FM	105.3	C	Rock AC	Savannah, GA	07/02/2003	145	Thoroughbred Communications	Richmond Hill, GA	Bryan
WSEG	AM	1400	C	Sports	Savannah, GA	07/02/2003	145	Southern Media Interactive LLC	Savannah, GA	Chatham
W SGA	FM	92.3	C	Country	Savannah, GA	09/09/2005	145	WRGO Radio LLC	Hinesville, GA	Liberty
WSOK	AM	1230	C	Gospel	Savannah, GA	07/02/2003	145	iHeartMedia Inc	Savannah, GA	Chatham
WSVH	FM	91.1	NC	Clis/Nws/Inf	Savannah, GA	07/02/2003	145	Georgia Public Telecommunications Commission	Savannah, GA	Chatham
WTHG	FM	104.7	C	Clisc Hits	Savannah, GA	07/02/2003	145	WRGO Radio LLC	Hinesville, GA	Liberty
WTKS	AM	1290	C	Talk	Savannah, GA	07/02/2003	145	iHeartMedia Inc	Savannah, GA	Chatham
W TYB	FM	103.9	C	Urban AC	Savannah, GA	01/26/2022	145	Cumulus Media Holdings Inc	Bluffton, SC	Beaufort
WU BB	FM	106.9	C	Country	Savannah, GA	07/06/2018	145	New Alpha	Bluffton, SC	Beaufort
WXY Y	FM	100.1	C	Hip Hop	Savannah, GA	06/30/2006	145	New Alpha	Rincon, GA	Effingham
WYFS	FM	89.5	NC	Christian	Savannah, GA	07/02/2003	145	Bible Broadcasting Network Inc	Savannah, GA	Chatham
WYKZ	FM	98.7	C	Soft Rock	Savannah, GA	07/02/2003	145	iHeartMedia Inc	Beaufort, SC	Beaufort

Number of Stations in Geographic Market 24

Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed