

**MULTIPLE OWNERSHIP
AMENDMENT**

As noted in the Nielsen Audio methodology ownership showing submitted with the original application, neither the Assignee nor its attributable party have any attributable interests in any other full-power station not considered in the showing that was previously “home” to the Metro unless (i) such exclusion has been in effect for at least two (2) years or (ii) such exclusion results from an FCC-approved change in the community of license for a station from within the Metro to outside the Metro.

Specifically, radio station WWPL(FM), Goldsboro, NC, FCC Facility ID No. 48369, is not considered in the Nielsen Audio ownership showing because WWPL(FM) is no longer “home” to the Metro. As shown in the BIA FCC Geographic Market Definition Report for Raleigh-Durham, NC (the “BIA Report”), submitted with the original application, Nielsen Audio removed WWPL(FM) from the Metro effective April 10, 2020—more than two (2) years ago. Such removal by Nielsen Audio was not done at the request of the Assignee or its attributable party and was not the result of an FCC-approved change in the community of license for WWPL(FM) or the result of a change in the geographic boundaries of the Metro. WWPL(FM) is licensed to Goldsboro, NC, in Wayne County, which is outside of the geographic boundaries of the Metro, and is not located in any other Nielsen Audio Metro.

Further, as shown in the BIA Report, while since September 3, 2004, there have been market designation changes for the applicant’s affiliated stations WQDR(AM) (change date 10/26/2006, over 16 years ago), WWPL(FM) (as noted earlier, change date 04/10/2020, over 2 years ago), and WYMY(FM) (change date 11/03/2004, over 18 years ago), and third party stations WCMC(FM) (change date 12/6/2005, over 16 years ago), WRSV(FM) (change date 06/03/2016, over 6 years ago), WRTP(FM) (change date 06/22/2009, over 13 years ago), and WVRD(FM) (change date 01/25/2008, over 14 years ago), all of these change have been in effect for more than two (2) years.

WWPL(FM)’s exclusion from the Metro is necessary for the proposed transaction to comply with the local radio ownership rule, and because the exclusion has been in effect for more than two (2) years, Assignee’s proposed acquisition of WKJO(FM) complies with the Commission’s multiple ownership rules under the Nielsen Audio methodology. *See 2002 Biennial Regulatory Review -- Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, FCC 03-127, ¶ 278 (2003).*

While WKJO(FM), the station subject to the instant application, is “home” to the Metro, WKJO(FM)’s principal community contour overlaps WWPL(FM)’s principal community contour. Attached hereto as Exhibit A is an engineering statement prepared by the Carl T. Jones Corporation demonstrating that the proposed acquisition of WKJO(FM) complies with the interim contour-overlap ownership methodology. Specifically, WKJO(FM)’s principal community contour creates a contour-defined radio market containing at least 49 operating commercial or noncommercial radio stations and in which the Applicant’s attributable party holds an attributable interest in only four (4) FM stations and three (3) AM stations, which is well within the limits under the local radio ownership rule.

Accordingly, the Assignee’s proposed acquisition of WKJO(FM) complies with the Commission’s multiple ownership rules under both the interim contour-overlap ownership methodology and the Nielsen Audio methodology.

* * * * *

EXHIBIT A

Engineering Statement

(Attached)



**STATEMENT OF WILLIAM J. GETZ
IN SUPPORT OF AN AMENDMENT TO AN
APPLICATION FOR CONSENT TO ASSIGNMENT
OF BROADCAST LICENSE
LMS FILE NO. 0000199628**

I am a Radio Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. This office has been authorized by the Applicant to prepare this statement and the associated exhibits in support of an Amendment to the above-referenced Application for Consent to Assignment of Broadcast License which demonstrates that the proposed acquisition of WKJO(FM), Smithfield, North Carolina, is compliant with Section 73.3555 of the FCC Rules as it applies to contour-defined radio markets.

Exhibit A depicts the WKJO(FM) principal community contour and the principal community contours of the proximate radio stations in which the applicant currently holds attributable interest.¹ As illustrated in Exhibit A, the WKJO(FM) principal community contour overlaps, at most, three other FM stations and three AM stations in which the Application holds attributable interest including WWPL(FM), Goldsboro, NC, which is licensed to a community which is located outside of a Nielsen Radio Metro Area. Accordingly, this Exhibit demonstrates that the proposed station acquisition results in a combination of stations which satisfies the multiple ownership criteria set forth in Section 73.3555 of the FCC Rules as it applies to contour-defined radio markets. The Geographic Market Analysis is contained in the original application.

¹ For the FM stations considered herein, the principal community contour is the predicted 3.16 mV/m (70 dBu) contour computed in accordance with Section 73.313 of the FCC Rules. For the AM stations considered herein, the principal community contour is the predicted daytime 5.0 mV/m groundwave contour computed in accordance with Section 73.183 of the FCC Rules. All stations represented herein are operating full service commercial or noncommercial radio stations and operate from transmitter sites located within 92 kilometers of the perimeter of the Subject Station's mutual 70 dBu contour overlap area.



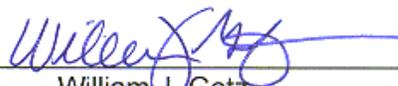
Multiple Ownership Contour-Defined Market Analysis

Exhibit B depicts the radio market defined by the total principal community contour area of WKJO(FM), WQDR-FM, WBBB(FM), WWPL(FM), WPTF(AM), WKIX(AM) and WQDR(AM) (i.e. the "Subject Stations") and the principal community contours for all the other stations in which the Applicant holds no cognizable interest counted in the market. Table 1 contains each station's call sign, city of license, state, channel of operation, and technical facilities.

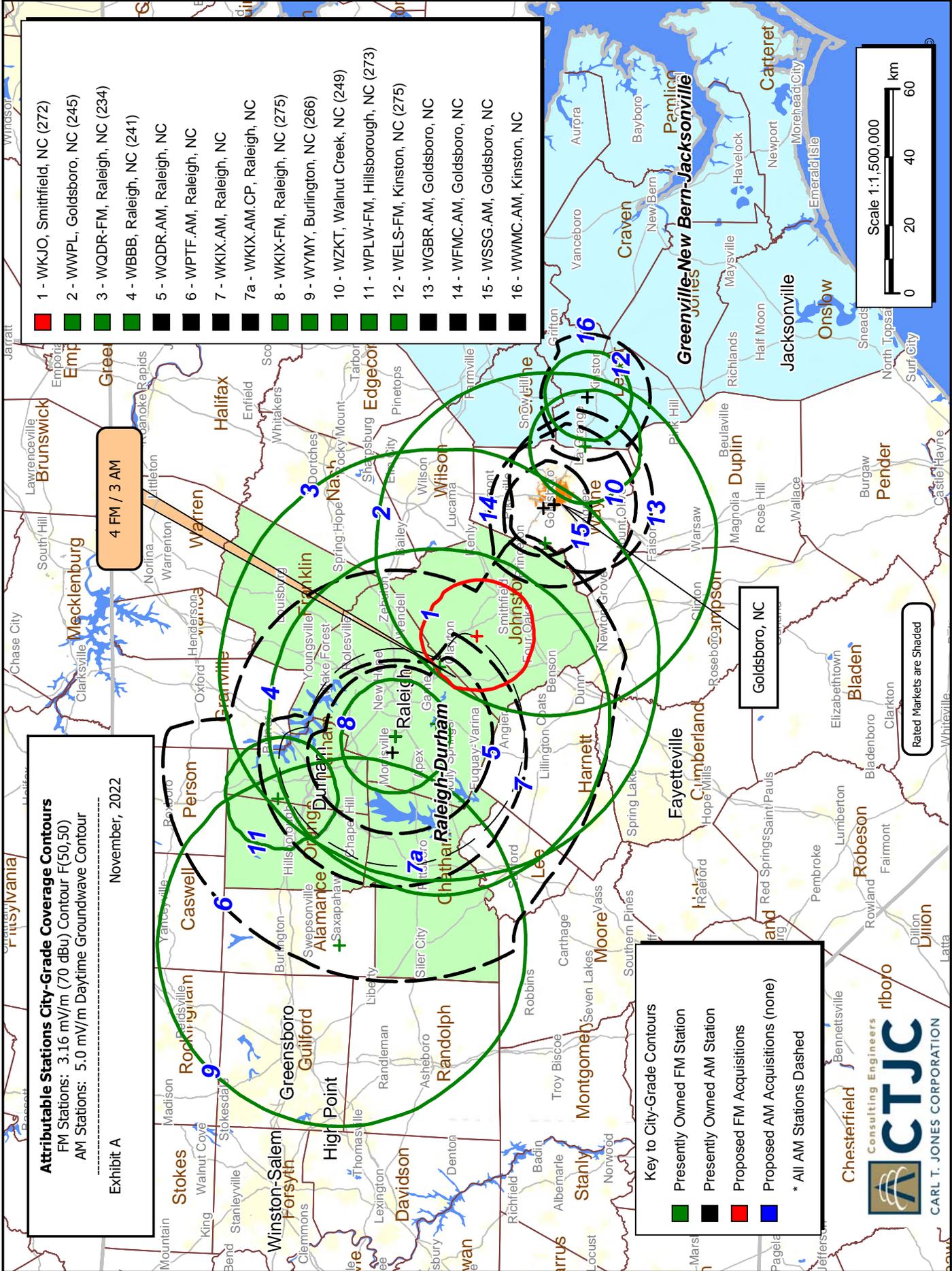
The applicant will own or control 4 FM stations and 3 AM stations in the contour-defined radio market. Pursuant to Section 73.3555(a)(1)(ii) of the FCC Rules, the applicant is permitted to own seven radio stations (four in the same service) provided the market contains 30 or more total stations. As shown in Exhibit B, the contour-defined radio market contains at least 49 operating commercial or noncommercial radio stations [defined by the city-grade contours of the 7 subject stations and the overlapped by the city-grade contours of at least 42 other stations in which the applicant holds no cognizable interest]. Accordingly, the proposed station acquisition results in a combination of stations which satisfies the multiple ownership criteria set forth in Section 73.3555 of the FCC Rules.

This statement and the supporting Exhibits and Table were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: November 23, 2022



William J. Getz



Attributable Stations City-Grade Coverage Contours
 FM Stations: 3.16 mV/m (70 dBu) Contour F(50,50)
 AM Stations: 5.0 mV/m Daytime Groundwave Contour

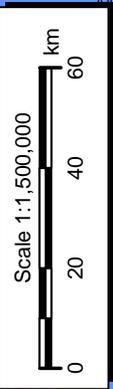
November, 2022

Exhibit A

4 FM / 3 AM

- 1 - WKJO, Smithfield, NC (272)
- 2 - WWPL, Goldsboro, NC (245)
- 3 - WQDR-FM, Raleigh, NC (234)
- 4 - WBBS, Raleigh, NC (241)
- 5 - WQDR-AM, Raleigh, NC
- 6 - WPTF-AM, Raleigh, NC
- 7 - WKIX-AM, Raleigh, NC
- 7a - WKIX-AM.CP, Raleigh, NC
- 8 - WKIX-FM, Raleigh, NC (275)
- 9 - WYMY, Burlington, NC (266)
- 10 - WZKT, Walnut Creek, NC (249)
- 11 - WPLW-FM, Hillsborough, NC (273)
- 12 - WELS-FM, Kinston, NC (275)
- 13 - WGBR-AM, Goldsboro, NC
- 14 - WFMC-AM, Goldsboro, NC
- 15 - WSSG-AM, Goldsboro, NC
- 16 - WWMC-AM, Kinston, NC

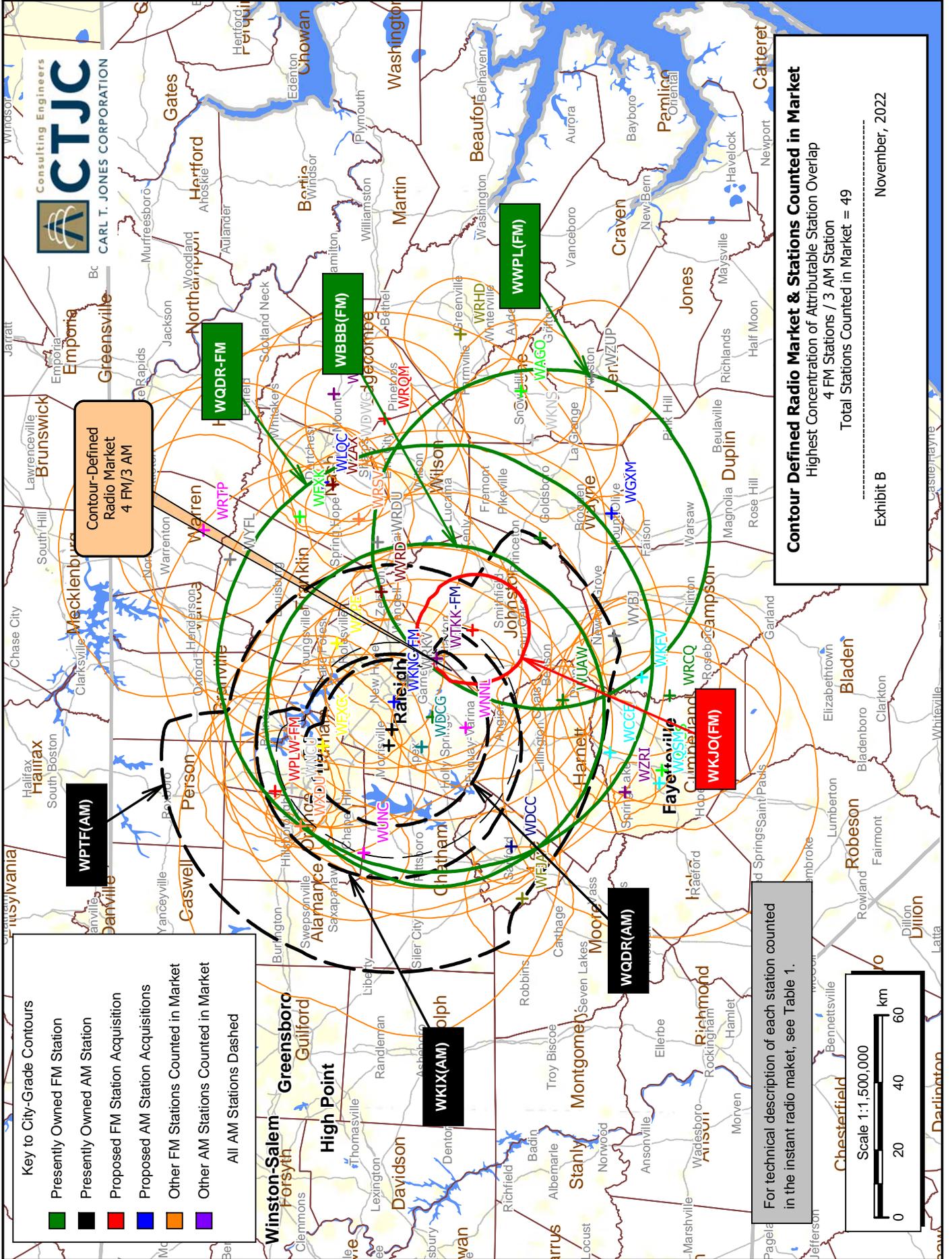
- Key to City-Grade Contours**
- Presently Owned FM Station
 - Presently Owned AM Station
 - Proposed FM Acquisitions
 - Proposed AM Acquisitions (none)
 - * All AM Stations Dashed



Rated Markets are Shaded

Chesterfield
 Consulting Engineers

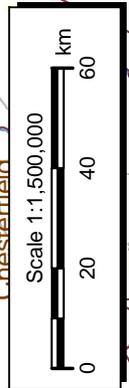
CTJC
 CARL T. JONES CORPORATION



Contour-Defined Radio Market
4 FM/3 AM

- Key to City-Grade Contours**
- Presently Owned FM Station
 - Presently Owned AM Station
 - Proposed FM Station Acquisition
 - Proposed AM Station Acquisitions
 - Other FM Stations Counted in Market
 - Other AM Stations Counted in Market
- All AM Stations Dashed

For technical description of each station counted in the instant radio market, see Table 1.



Contour Defined Radio Market & Stations Counted in Market
 Highest Concentration of Attributable Station Overlap
 4 FM Stations / 3 AM Station
 Total Stations Counted in Market = 49

Exhibit B

November, 2022



**Technical Description of Stations
Counted in Proposed Radio Market**

November, 2022

	<u>Call</u>	<u>Status</u>	<u>Channel/Freq</u>	<u>Service</u>	<u>City</u>	<u>State</u>	<u>DA</u>	<u>AM Day Power</u>	
								<u>FM ERP (kW)</u>	<u>Fac. ID</u>
1	WKJO*#	LIC	272	FM	Smithfield	NC	No	2.6	61259
2	WWPL*	LIC	245	FM	Goldsboro	NC	No	100	48369
3	WQDR-FM*	LIC	234	FM	Raleigh	NC	No	100	9076
4	WBBB*	LIC	241	FM	Raleigh	NC	No	100	889
5	WQDR*	LIC	570	AM	Raleigh	NC	No	1	61698
6	WPTF*	LIC	680	AM	Raleigh	NC	Yes	50	21630
7	WKIX*	LIC	850	AM	Raleigh	NC	Yes	10	888
8	WKNC-FM	LIC	201	FM	Raleigh	NC	Yes	25	49160
9	WUAW	LIC	202	FM	Erwin	NC	No	3	9842
10	WRTP	LIC	203	FM	Franklinton	NC	No	24	5018
11	WAGO	LIC	204	FM	Snow Hill	NC	No	17	51730
12	WXDU	LIC	204	FM	Durham	NC	Yes	2.15	17695
13	WRKV	LIC	205	FM	Raleigh	NC	Yes	50	60028
14	WXYC	LIC	207	FM	Chapel Hill	NC	Yes	1.1	63561
15	WZRI	LIC	207	FM	Spring Lake	NC	Yes	2	14227
16	WCPE	LIC	209	FM	Raleigh	NC	No	100	18831
17	WCCE	LIC	211	FM	Buies Creek	NC	Yes	15	8499
18	WKNS	LIC	212	FM	Kinston	NC	Yes	35	14358
19	WVRD	LIC	213	FM	Zebulon	NC	No	1.2	41094
20	WDCC	LIC	213	FM	Sanford	NC	No	2	9841
21	WYBJ	LIC	214	FM	Newton Grove	NC	No	2.9	85072
22	WNCU	LIC	214	FM	Durham	NC	Yes	50	49162
23	WRQM	LIC	215	FM	Rocky Mount	NC	No	7.5	49158
24	WGXM	LIC	216	FM	Calypso	NC	Yes	2.2	173569
25	WUNC	LIC	218	FM	Chapel Hill	NC	Yes	100	66581
26	WFSS	LIC	220	FM	Fayetteville	NC	Yes	100	21241
27	WRSV	LIC	221	FM	Elm City	NC	No	3.3	54823
28	WYFL	LIC	223	FM	Henderson	NC	Yes	100	5100
29	WNCB	LIC	230	FM	Cary	NC	Yes	100	53596
30	WRHD	LIC	232	FM	Farmville	NC	No	3.9	26020
31	WPWZ	LIC	238	FM	Pinetops	NC	No	12.5	74222
32	WQOK	LIC	248	FM	Carrboro	NC	No	50	69559
33	WQSM	LIC	251	FM	Fayetteville	NC	No	100	8582
34	WDWG	LIC	253	FM	Rocky Mount	NC	No	16	54861
35	WZAX	LIC	257	FM	Nashville	NC	No	6	76264
36	WCMC-FM	LIC	260	FM	Holly Springs	NC	No	26.5	51760
37	WRDU	LIC	264	FM	Wake Forest	NC	No	100	74125
38	WRAL	LIC	268	FM	Raleigh	NC	No	98	73920
39	WPLW-FM	LIC	273	FM	Hillsborough	NC	No	1.5	22322
40	WLQC	LIC	276	FM	Sharpsburg	NC	No	4.4	170946
41	WRCQ	LIC	278	FM	Dunn	NC	No	48	34826
42	WNNL	LIC	280	FM	Fuquay-Varina	NC	Yes	7.9	9728
43	WFXK	LIC	282	FM	Bunn	NC	No	100	24931
44	WZUP	LIC	284	FM	La Grange	NC	No	29	17618
45	WDCG	LIC	286	FM	Durham	NC	No	73	53597
46	WFJA	LIC	288	FM	Sanford	NC	No	2.7	74180
47	WTKK	LIC	291	FM	Knightdale	NC	No	27.5	73936
48	WFXC	LIC	296	FM	Durham	NC	No	13	36952
49	WKFV	LIC	297	FM	Clinton	NC	No	9.2	11066

* Subject Station - Principal community contour defines the radio market boundary

Proposed Acquisition