

### **Compliance with Section 73.3555**

The applicant is simultaneously filing two assignment applications to acquire the stations listed below from two licensees. Attached is a report of Anderson Associates demonstrating that the acquisition of the following stations complies with the FCC's local radio ownership rules:

- WAL5(FM), Oglesby, IL Facility ID 17316
- WBZG(FM), Peru, IL Facility ID 69732
- WGLC-FM, Mendota, IL Facility ID 41165
- WIVQ(FM), Spring Valley, IL Facility ID 28312
- WSPL(AM), Streator, IL Facility ID 63535
- WSTQ(FM), Streator, IL Facility ID 63534
- WYYS(FM), Streator, IL Facility ID 35058

These stations are outside Nielsen Audio metro markets. Thus, the interim contour methodology is used to determine compliance with the rules. As set forth in the study, there are three markets created by the common overlaps of stations being acquired.

The first market is defined by the contours of WGLC-FM and WIVQ(FM). There are 12 stations with overlapping contours. Thus, the ownership of 2 FM stations in a market of 12 stations that does not involve ownership of more than half of the stations in the market is permissible.

The second market is one defined by the contours of WAL5(FM), WBZG(FM), WIVQ(FM), and WYYS(FM). In that market, there are 17 stations that have overlapping contours. In a market with over 15 signals, ownership of 4 FM stations is permitted.

The final market is defined by the contours of WAL5(FM), WSPL(AM), WSTQ(FM), and WYYS(FM). There are 15 stations that have overlapping contours in this market. In a market with 15 stations, ownership of 3 FMs and 1 AM is permissible.

### **Contour Overlap Ownership Study**

This ownership study is provided in support of the assignment of the following stations:

WALS(FM) 291A Oglesby, IL	FCC Facility I.D.	17316
WBZG(FM) 265A Peru, IL		69732
WGLC-FM 261A Mendota, IL		41165
WIVQ(FM) 277A Spring Valley, IL		28312
WSPL(AM) 1250 kHz Streator, IL		63535
WSTQ(FM) 249A Streator, IL		63534
WYYS(FM) 291A Streator, IL		35058

A reference plot is provided in exhibit E-1. None of the stations are located within a Nielsen rated market; as a consequence, the permitted common ownership is determined using the contour overlap methodology. The following exhibits include the city grade contours, 3.16 mV/m (70 dBu) (FM) and 5 mV/m (AM), of all stations intersecting any of the mutually overlapping stations, including noncommercial facilities, and excludes any stations with a transmitter site greater than 92 km from any portion of the mutually overlapping area, as well as any commonly owned stations which do not mutually overlap the defined market.

# Anderson Associates

---

## Broadcast Engineering Consultants

The common ownership forms three markets, which are plotted and listed in exhibits E-2 to E-7. Following the rules provided by CFR §73.3555(a)(1)(iii) and (iv), the common ownership of the stations in the defined market is permissible.

It is noted that the FCC 30 meter terrain database and V-Soft Communications Probe 4 program were utilized in the analysis of these markets.



---

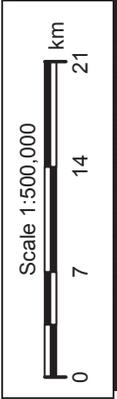
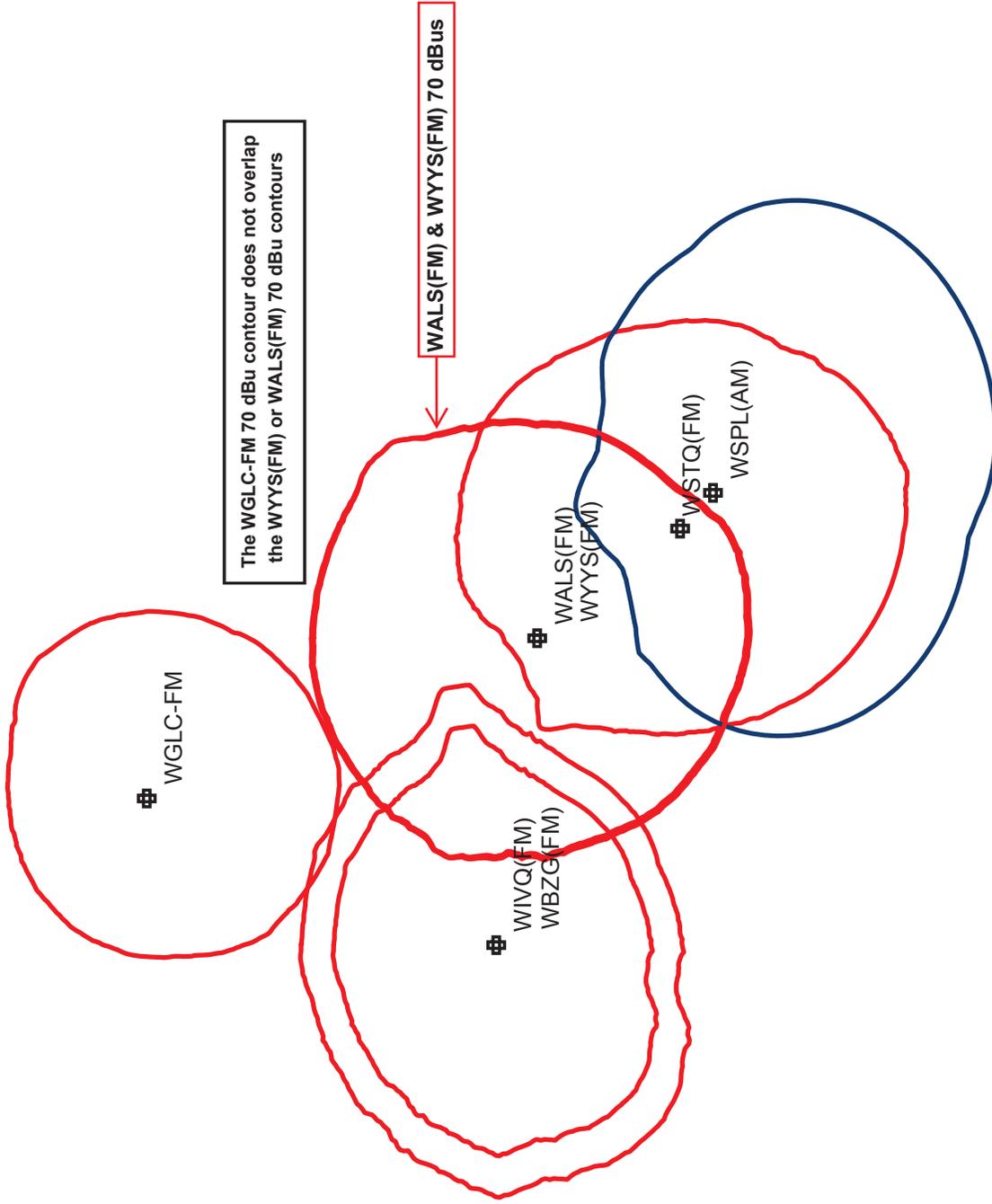
Christopher Anderson January 17, 2023  
andersce@bham.rr.com

© 2023 by Anderson Associates

# E-1 Ownership Reference Plot

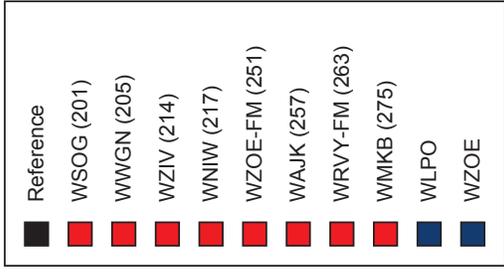
- WALS(FM) (271)
- WBZG(FM) (265)
- WGLC-FM (261)
- WIVQ(FM) (277)
- WSPL(AM)
- WSTQ(FM) (249)
- WYYS(FM) (291)

©2022 Anderson Associates

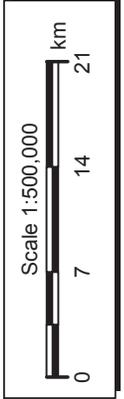
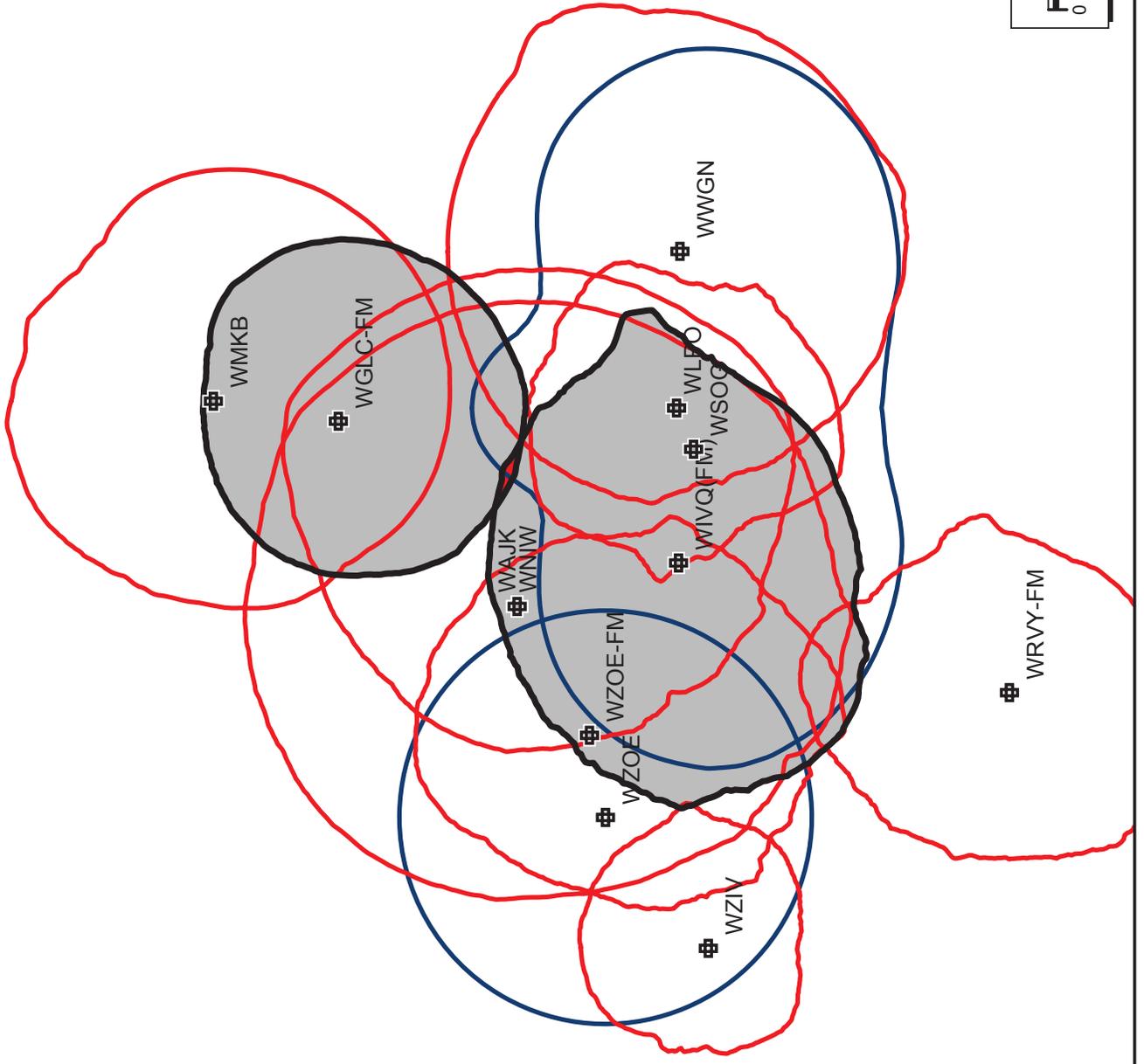


# E-2 Ownership Market #1 Plot

Reference  
WGLC-FM  
WIVQ(FM)



©2022 Anderson Associates



## E-3 Ownership Market #1 List

2 FMs in a total market of number of 12 overlapping contours:

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WGLC-FM	FM	261A Mendota	IL	0000105899	0.0	0.0
WIVQ (FM)	FM	277A Spring Valley	IL	BLH19991227AAP	28.0	202.7

Overlapping Contours:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WSOG	FM	201A Spring Valley	IL	BLED20130528AAH	27.1	184.6
WWGN	FM	205B1 Ottawa	IL	BLED20051122AAT	29.0	153.6
WZIV	FM	214A Princeton	IL	0000125001	49.0	235.0
WNIW	FM	217B La Salle	IL	BLED19981229KA	19.6	226.1
WZOE-FM	FM	251A Princeton	IL	BMLH20151120BAL	30.6	231.4
WAJK	FM	257B1 La Salle	IL	BLH19891026KC	19.6	226.1
WRVY-FM	FM	263A Henry	IL	BMLH20151117AAC	55.1	202.1
WMKB	FM	275A Earlville	IL	BLH20030203CNW	9.6	9.1
WLPO	AM	1220 LASALLE	IL	BL19870821AA	25.7	177.8
WZOE	AM	1490 PRINCETON	IL	BL13480	36.4	236.1

Distance and bearing calculations from coordinates: 41-32-07.90 N, 089-06-26.20 W

Duopoly Options:

TV: Not Included

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

AM: 5.0 mV/m

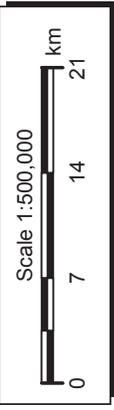
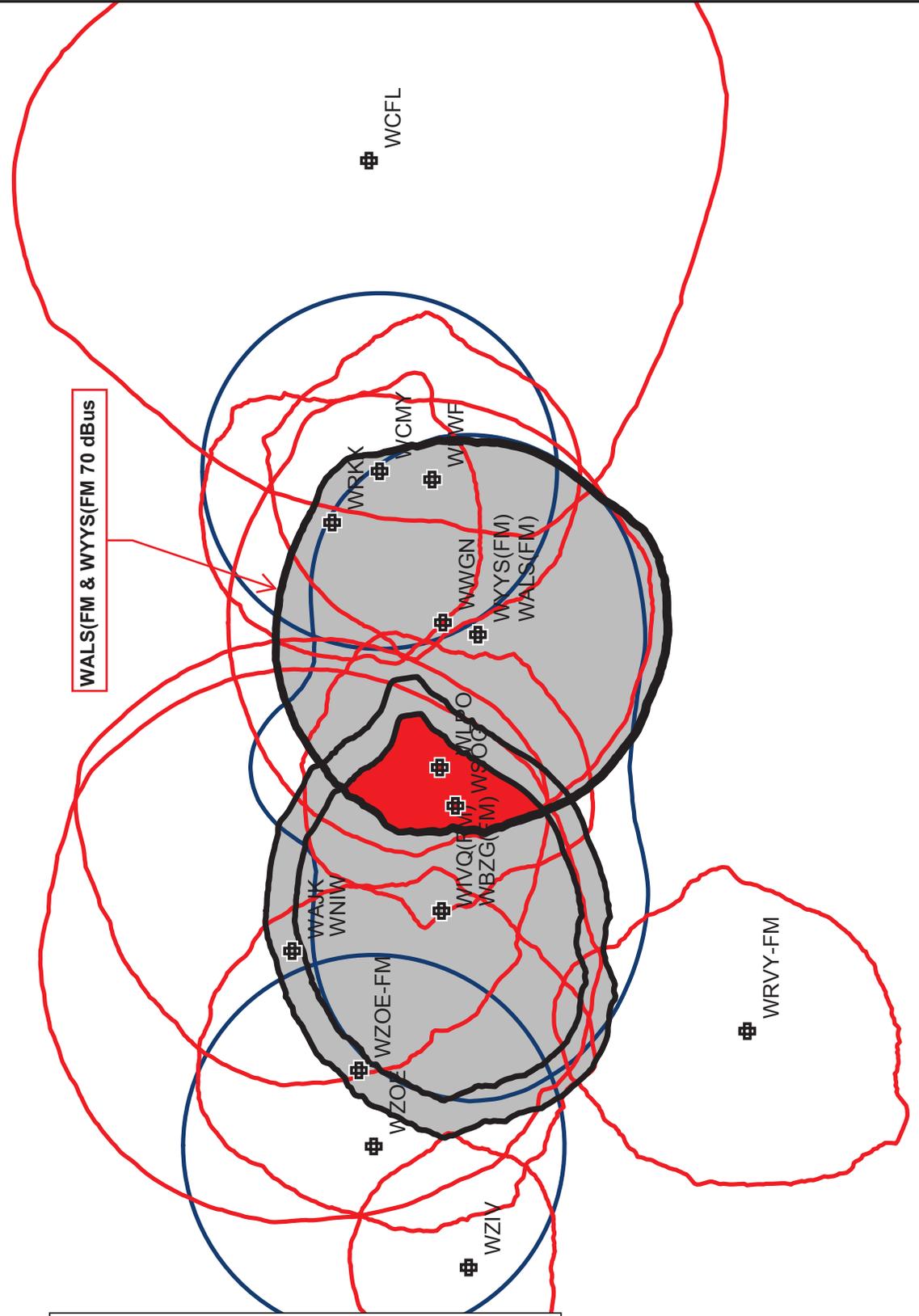
Stations more than 92 km from the common area were excluded.

# E-4 Ownership Market #2 Plot

Reference  
 WALS(FM)  
 WBZG(FM)  
 WIVQ(FM)  
 WYYS(FM)

Reference	WSOG (201)
WALS(FM)	WWGN (205)
WBZG(FM)	WZIV (214)
WIVQ(FM)	WNIW (217)
WYYS(FM)	WRKX (237)
	WLWF (243)
	WZOE-FM (251)
	WAJK (257)
	WRVY-FM (263)
	WCFL (284)
	WCMY
	WLPO
	WZOE

©2022 Anderson Associates



## E-5 Ownership Market #2 List

4 FMs in a total market of 17 overlapping contours.

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WALS (FM)	FM	271A Oglesby	IL	BMLH20170307APM	0.0	0.0
WBZG (FM)	FM	265A Peru	IL	BLH19991227AAQ	22.9	277.6
WIVQ (FM)	FM	277A Spring Valley	IL	BLH19991227AAP	22.9	277.6
WYYS (FM)	FM	291A Streator	IL	BMLH20170307APL	0.0	90.0

Overlapping Contours:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WSOG	FM	201A Spring Valley	IL	BLED20130528AAH	14.2	277.6
WVGN	FM	205B1 Ottawa	IL	BLED20051122AAT	3.0	19.6
WZIV	FM	214A Princeton	IL	0000125001	52.1	270.9
WNIW	FM	217B La Salle	IL	BLED19981229KA	30.2	300.5
WRKX	FM	237A Ottawa	IL	BLH19970422KE	15.1	37.7
WLWF	FM	243A Marseilles	IL	BLH19990608KC	13.3	73.7
WZOE-FM	FM	251A Princeton	IL	BMLH20151120BAL	37.1	285.4
WAJK	FM	257B1 La Salle	IL	BLH19891026KC	30.2	300.5
WRVY-FM	FM	263A Henry	IL	BMLH20151117AAC	39.4	235.9
WCFL	FM	284B Morris	IL	BMLD20190805ABO	40.1	77.2
WCMY	AM	1430 OTTAWA	IL	BL4687	15.7	59.1
WLPO	AM	1220 LASALLE	IL	BL19870821AA	11.3	286.1
WZOE	AM	1490 PRINCETON	IL	BL13480	42.9	281.6

Distance and bearing calculations from coordinates: 41-16-32.10 N, 088-57-55.30 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.

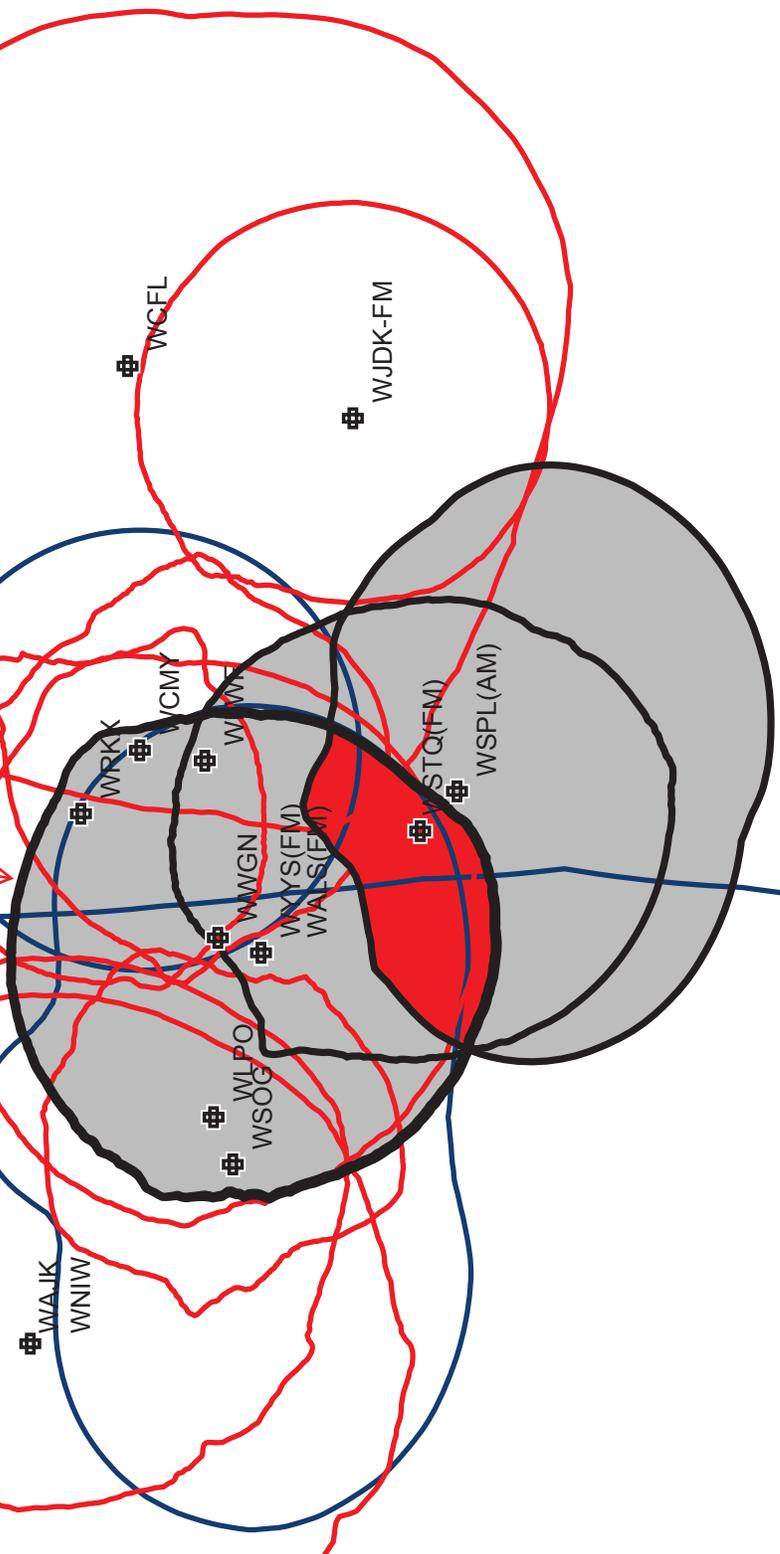
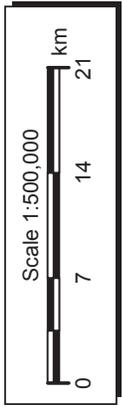
# E-6 Ownership Market #3 Plot

Reference  
 WALS(FM)  
 WSPL(AM)  
 WSTQ(FM)  
 WYYS(FM)

- Reference
- WSOG (201)
- WWGN (205)
- WNIW (217)
- WRKX (237)
- WJDK-FM (239)
- WLWF (243)
- WAJK (257)
- WCFL (284)
- WLS
- WCMY
- WLPO

WALS(FM) & WYYS(FM) 70 dBu

©2022 Anderson Associates



## E-7 Ownership Market #3 List

3 FM and 1 AM in a total market of 15 overlapping contours.

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WALS (FM)	FM	271A Oglesby	IL	BMLH20170307APM	0.0	0.0
WSPL (AM)	AM	1250 STREATOR	IL	BL8081	16.9	140.4
WSTQ (FM)	FM	249A Streator	IL	BMLH20000927ABY	13.3	142.4
WYYS (FM)	FM	291A Streator	IL	BMLH20170307APL	0.0	90.0

Overlapping Contours:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WSOG	FM	201A Spring Valley	IL	BLED20130528AAH	14.2	277.6
WVGN	FM	205B1 Ottawa	IL	BLED20051122AAT	3.0	19.6
WNIW	FM	217B La Salle	IL	BLED19981229KA	30.2	300.5
WRKX	FM	237A Ottawa	IL	BLH19970422KE	15.1	37.7
WJDK-FM	FM	239A Seneca	IL	BLH19971204KD	36.1	99.7
WLWF	FM	243A Marseilles	IL	BLH19990608KC	13.3	73.7
WAJK	FM	257B1 La Salle	IL	BLH19891026KC	30.2	300.5
WCFL	FM	284B Morris	IL	BMLD20190805ABO	40.1	77.2
WLS	AM	890 CHICAGO	IL	BL19860731AL	98.4	71.2
WCMY	AM	1430 OTTAWA	IL	BL4687	15.7	59.1
WLPO	AM	1220 LASALLE	IL	BL19870821AA	11.3	286.1

Distance and bearing calculations from coordinates: 41-16-32.10 N, 088-57-55.30 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.