

MULTIPLE SERVICES STUDY

Associated with the
Co-ownership of Stations:

WKOV-FM – Oak Hill, OH
WCJO(FM) – Jackson, OH
WYRO(FM) – McArthur, OH
WXTQ(FM) – Athens, OH
WATH(AM) – Athens, OH
WYPC(AM) – Wellston, OH

Interim Contour Methodology

November 2022

CERTIFICATION OF ENGINEERS

The firm of Munn-Reese, Broadcast Engineering Consultants, with offices at 385 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data forming this report.

The data utilized in this report was taken from the FCC Secondary Database and data on file. While this information is believed accurate, errors or omissions in the database and file data are possible. This firm may not be held liable for damages as a result of such data errors or omissions.

The report has been prepared by properly trained electronics specialists under the direction of the undersigned whose qualifications are a matter of record before the Federal Communications Commission.

I declare under penalty of the laws of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

November 15, 2022

MUNN-REESE

By 

Bruce Bellamy, President

385 Airport Drive, PO Box 220
Coldwater, Michigan 49036

Telephone: 517-278-7339

MUNN-REESE
Broadcast Engineering Consultants
Coldwater, MI 49036

Engineering Statement

This firm was retained to determine whether the Jackson County Broadcasting Inc.'s continued ownership of its current attributable broadcast interests, with the acquisition of WATH(AM) – Athens, OH and WXTQ(FM) – Athens, OH complies with the Commission's multiple ownership rule, 47 C.F.R. Section 73.3555. This report is being submitted with the application associated with the acquisition of these two stations.

With this acquisition there will be a total of (6) commonly owned or controlled stations.

Portions of these holdings are subject to analysis under either the *Interim Contour-overlap Methodology* or the *BIA Market Methodology*. This study solely addresses the *Interim Contour-overlap Methodology* portion of these holdings.

Under the *Interim Contour-overlap Methodology*, two separate and distinct markets will result within this entire ownership group. "Market 1" is comprised of WXTQ(FM) and WATH(AM). "Market 2" is comprised of WYRO(FM), WYPC(AM), WCJO(FM), and WKOV-FM.

"Market 1" consists of one (1) AM and one (1) FM station and is permissible under 73.3555(a)(1)(iv).

"Market 2" consists of one (1) AM Station and three (3) FM stations.

The existing facilities of the stations included in this report were determined by the use of currently updated copies of the FCC computer databases of AM and FM stations. The listed facilities served as the basis for the computation of the respective principal community contours. The accuracy of the results of this study is understood to be limited to the accuracy of these databases. The FCC databases give no indication of licensed facilities that may be inoperative, construction permit facilities that may now be operating under program test authority (but have not yet been issued a license) or facilities which may have been licensed since the last update. Therefore, some stations may have been included or excluded erroneously. However, unless otherwise indicated, all licensed facilities known to be inoperative and all known applications and construction permit facilities, have been eliminated from consideration in this study.

For AM stations, Map M-3 soil conductivity values and the authorized licensed transmitting facilities served as the basis for the computation of the predicted 5.0 mV/m groundwave contour in accordance with §73.183 of the FCC Rules. The distance to the contour was computed for seventy-two (72) equally spaced azimuths beginning with 0° True. For FM stations, the authorized Center of Radiation and ERP values were utilized to compute the predicted 3.16 mV/m (70 dBu) contour as provided in §73.313 of the Rules. The predicted FM contours shown in this report are based on the use of 72 equally spaced terrain radials beginning with 0° True.

Engineering Statement (continued)

There is only one (1) unique and distinct market associated with this filing that requires the *Interim Contour-overlap Methodology*. The market has been defined, in accordance with §73.3555 of the FCC Rules, as the area within the total perimeter formed by the combined principal community contours of WYRO(FM), WYPC(AM), WCJO(FM), and WKOV-FM as designated Market #2.

Exhibit 1.0 shows the six (6) stations under common control or proposed to be under common control which are relevant for this ownership group. The “Market 1” and Market 2” common overlap areas have been designated as well.

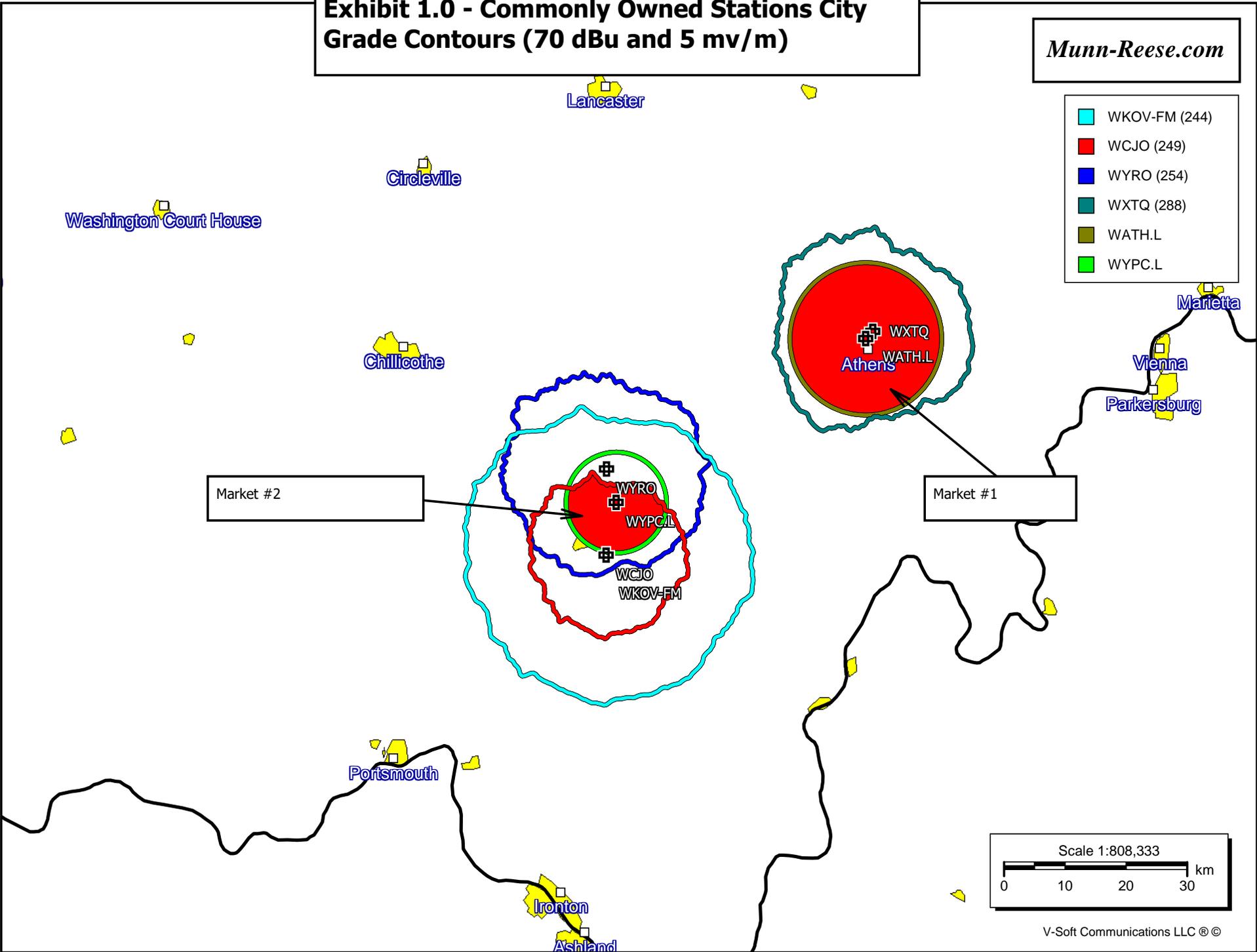
For “Market 2”, the market defining contours have been shown in **Exhibit 2.0** of this report along with enough additional principal community contours entering the market. The defining contours have been shown with purple dashed lines on this map. AM contours entering the market have been denoted in green lines. FM contour entering the market have been shown in red lines. Co-owned stations entering the market, but not defining the market have been omitted. **Exhibit 2.1** a tabulation of the stations.

Under the current rules, “Market 2” falls at least within the minimum limitations set forth in §73.3555 (a)(1)(iv): ***In a radio market with 14 or fewer full-power, commercial and noncommercial radio stations, not more than 5 commercial radio stations in total or not more than 3 commercial stations in the same service (AM or FM); provided however, that no person or single entity (or entities under common control) may have a cognizable interest in more than 50% of the full-power, commercial and noncommercial stations in such market unless the combination of stations comprises not more than one AM and one FM station.*** The principal community contours of at least six (6) other stations entering the Market 2 are shown in **Exhibit 2.0**. Including the (3) FM and 1 (AM) stations which define the market, there are at least ten (10) aural services in “Market 2”, giving less than a 50% interest in the market. **Exhibit 2.1** lists the facilities of the individual stations used in this “Market 2” report.

Exhibit 1.0 - Commonly Owned Stations City Grade Contours (70 dBu and 5 mv/m)

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- WKOV-FM (244)
- WCJO (249)
- WYRO (254)
- WXTQ (288)
- WATH.L
- WYPC.L



Market #2

Market #1

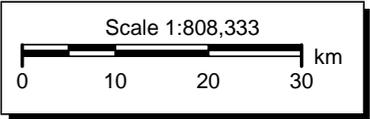


Exhibit 2.0 - Market #2 Duopoly Study

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REF
WYRO
WYPC
WCJO
WKOV-FM

- REF
- WOUB-FM (217)
- WOUH-FM (220)
- WKKJ (232)
- WGNH (235)
- WXZQ (261)
- WXBW (268)
- WPYK (281)

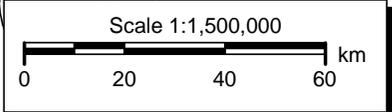
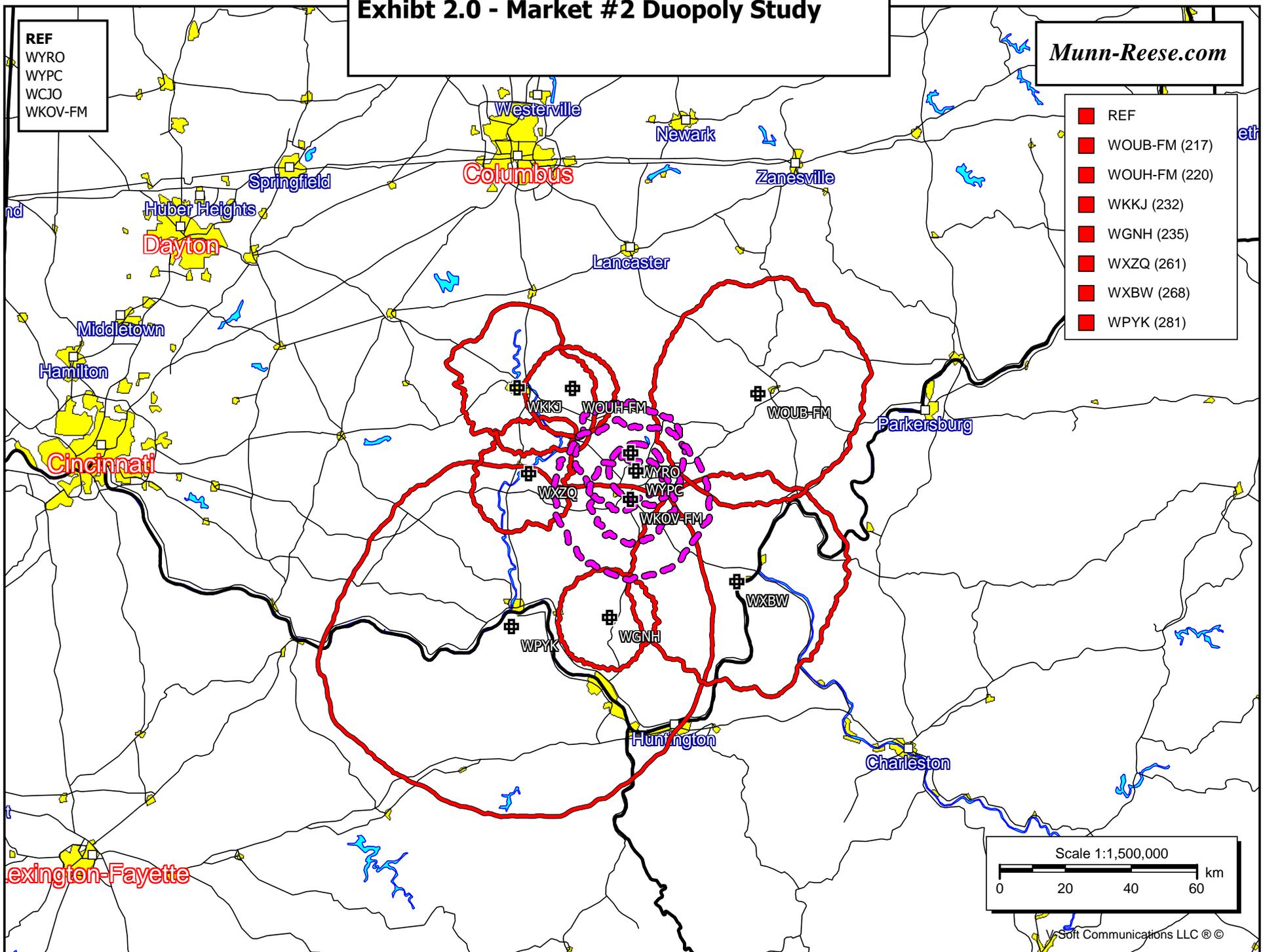


Exhibit 2.1

Tabulation of Select Stations Entering "Market 2"

Stations Entering Market 2: (No Less than 6)

Total number of overlapping contours: 11

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WYRO	FM	254A Mearthur	OH	0000189720	0.0	0.0
WYPC	AM	1330 WELLSTON	OH	BL12747	5.6	164.0
WCJO	FM	249A Jackson	OH	BLH20050831AAY	14.0	180.2
WKOV-FM	FM	244B1 Oak Hill	OH	BMLH20160201AFT	14.0	180.2

Overlapping Contours:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WOUB-FM	FM	217B Athens	OH	BLED20020517ABA	42.5	65.2
WOUH-FM	FM	220A Chillicothe	OH	BLED19920709KB	26.3	317.6
WKKJ	FM	232B1 Chillicothe	OH	BLH20061101ADJ	39.7	299.6
WGNH	FM	235A South Webster	OH	BLED20090514ACI	50.0	187.4
WXZQ	FM	261A Piketon	OH	BLH19971210KD	31.6	258.6
WXBW	FM	268B Gallipolis	OH	BLH19870923KB	50.4	140.3
WPYK	FM	281C0 Portsmouth	OH	BLED20181011AAC	63.6	214.7

Distance and bearing calculations from coordinates: 39-09-17.94 N, 082-35-48.91 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.