

Section 73.3555(a)(1)
Multiple Ownership Exhibit
Radigan Broadcasting Group, LLC
WOKN WLKY WELM

August 21, 2023

This statement and attached exhibits were prepared on behalf of Radigan Broadcasting Group, LLC, (“Radigan”). Radigan has filed an FCC Form 314 Assignment Application to acquire the licenses of WOKN, Channel 258A, Facility ID No. 47322, Southport, New York, WLKY, 1600 kHz, Facility ID No. 55271, Elmira Heights – Horseheads, New York and WELM, Facility ID No. 52120, 1410 kHz, Elmira, New York from Tower Broadcasting LLC (“Tower”). Therefore, a Section 73.3555(a) Multiple Ownership Exhibit is required. The principals of Radigan also have a 100 percent interest in WATS UP, LLC, (“WATS”), licensee of WATS, Facility ID No. 74104, Sayre, Pennsylvania and WAVR, Channel 271A, Facility ID No. 71103, Waverly, New York. None of the aforementioned stations are home to or licensed to a metro county in any Nielsen rated market. Therefore, an interim contour overlap study for stations not licensed to a Nielsen Audio metro is necessary.

There is one Defined Radio Market created for this proposed assignment. The combined city grade contours WOKN, WELM, WLKY, WAVR and WATS will be used to determine the number of stations in Defined Radio Market #1. These combined city grade contours will be considered the “Radio Market Boundary”. 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 controlled by Radigan will be considered as a market contributor unless it is a subject station in the radio

market under study.

Map One shows the five stations currently controlled by Radigan/WATS as well as the three Tower stations being acquired. The three Tower station city grade contours are shown in blue. The two contours of the WATS stations, WATS and WAVR are shown in green. Both WATS stations city grade contours overlap with the three Tower stations city grade contours. The remaining three Radigan stations, WEBO, WTXW and WTTC-FM do not overlap city grade contours with any of the Tower stations.

Map Two shows the Defined Radio Market No. 1 stations and boundary in green. This includes the three Tower stations, WOKN, WELM and WLKY and the two WATS stations WEBO and WAVR, making a combined total of five stations, three AM and two FM stations.

Map Three shows the Defined Radio Market No. 1 stations and boundaries and well as all other stations that overlap contours with the market boundary. The city grade contours of the three Radigan non-subject stations, WEBO, WTXW and WTTC-FM are shown in black. All three stations overlap with the market boundary but none of the Tower stations. Therefore, those three stations are not considered in the total number of stations in the market. All other FM station contours are shaded in red and all other AM stations are shaded in blue.

Map Four is a close-up view of the western portion of the Defined Radio Market and Map Five is a close-up view of the eastern portion of the Defined Radio Market. These maps are provided to make it easier to identify all of the stations which make up the defined market.

A total of 49 stations, including the five subject stations are shown. The three commonly owned non-subject stations are not included in the market total. Therefore, there are a total of 46 commercial and non-commercial full power AM and FM stations in Defined Radio Market No. 1. A Table of Stations Shown follows the maps. The number of stations depicted falls in 45 or greater stations level. According to FCC Section 73.3555(a)(1)(i), common ownership or control of up to eight stations with no more than five stations in the same band is permissible. Radigan will own or have interest in three AM stations and two FM stations in Defined Radio Market No. 1.

Based on the review of the Non-Nielsen Audio Metro market, this assignment application for Radigan is in compliance with the Commission's revised contour overlap rules. It is believed that this FCC Form 314 Assignment Application is in compliance with Section 73.3555(a) of the rules.

The foregoing technical statement was prepared on behalf of Radigan Media, 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 LMS database. All maps were created using V-Soft Probe 4 Professional Version 4.122. We assume no liability for errors or omissions in that database or program which may be adverse to the information contained herein.

WOKN

Southport, NY
 BLH20160311AAR
 Latitude: 42-01-55 N
 Longitude: 076-47-01 W
 ERP: 1.7 kW
 HAAT: 191 m
 Channel: 258
 Frequency: 99.5 MHz
 AMSL Height: 594 m

WLKY

Elmira Hts - Horsehds, NY
 BL20030501ACS
 Latitude: 42-07-11 N
 Longitude: 076-48-37 W
 Frequency: 1600
 Power: 5.0 kW Day

WELM

Elmira, NY
 BL19871026AH
 Latitude: 42-07-11 N
 Longitude: 076-48-37 W
 Frequency: 1410
 Power: 5.0 kW Day

WAVR

Waverly, NY
 BMLH19990211KC
 Latitude: 42-03-48.30 N
 Longitude: 076-31-26.80 W
 ERP: 4.1 kW
 HAAT: 122 m
 Channel: 271
 Frequency: 102.1 MHz
 AMSL Height: 500 m

WATS

Sayre, PA
 BL19830301AE
 Latitude: 41-59-48 N
 Longitude: 076-30-03 W
 Frequency: 960
 Power: 5.0 kW Day

Map One: Section 73.3555(a) Multiple Ownership

Non-Nielsen Audio Market - Defined Radio Market #1

Subject Stations: WOKN(FM) WLKY(AM) WELM(AM) (Blue)

Co-owned stations that overlap city grade contours:

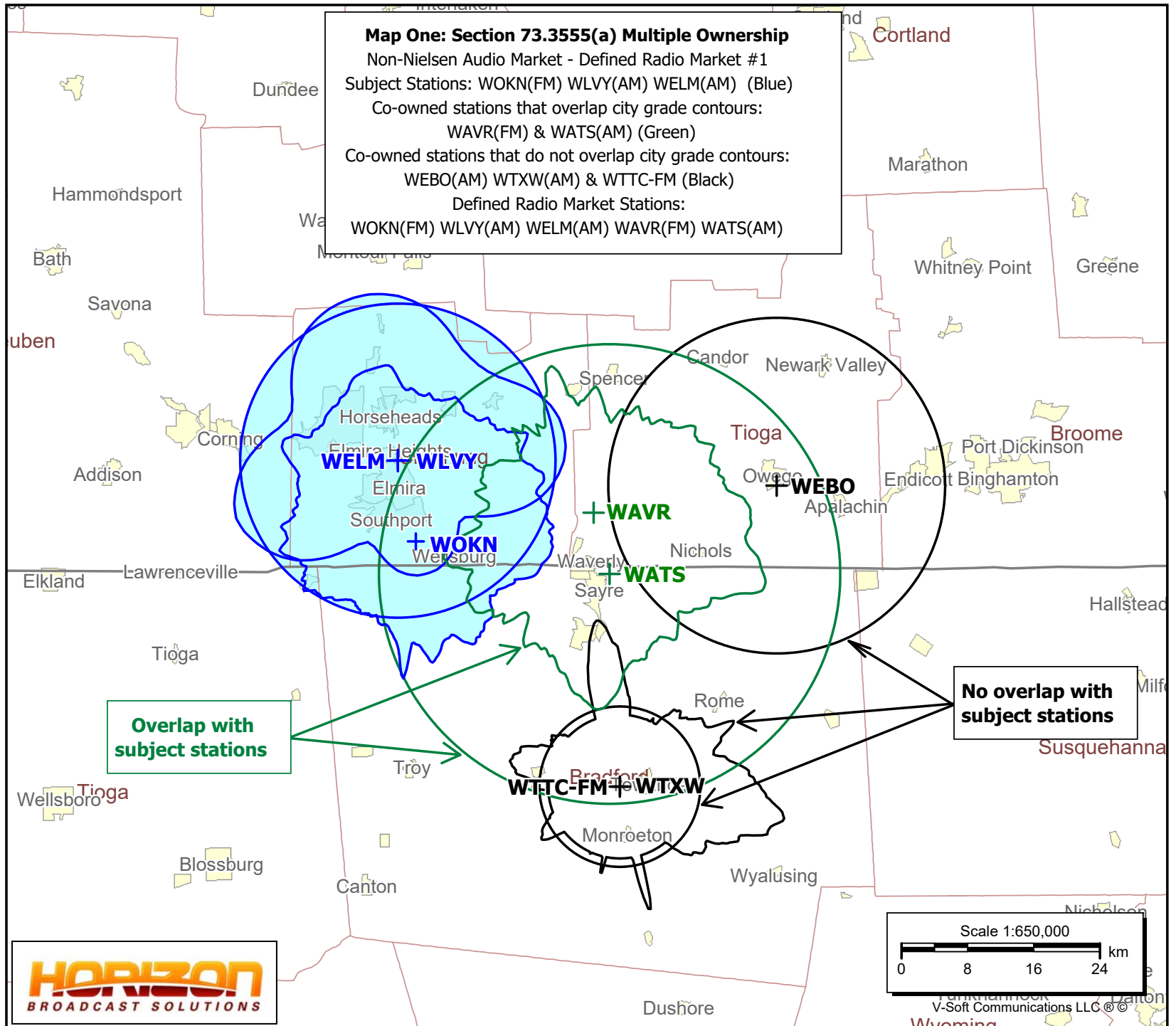
WAVR(FM) & WATS(AM) (Green)

Co-owned stations that do not overlap city grade contours:

WEBO(AM) WTXW(AM) & WTTC-FM (Black)

Defined Radio Market Stations:

WOKN(FM) WLKY(AM) WELM(AM) WAVR(FM) WATS(AM)



WOKN

Southport, NY
 BLH20160311AAR
 Latitude: 42-01-55 N
 Longitude: 076-47-01 W
 ERP: 1.7 kW
 HAAT: 191 m
 Channel: 258
 Frequency: 99.5 MHz
 AMSL Height: 594 m

WLKY

Elmira Hts - Horsehds, NY
 BL20030501ACS
 Latitude: 42-07-11 N
 Longitude: 076-48-37 W
 Frequency: 1600
 Power: 5.0 kW Day

WELM

Elmira, NY
 BL19871026AH
 Latitude: 42-07-11 N
 Longitude: 076-48-37 W
 Frequency: 1410
 Power: 5.0 kW Day

WAVR

Waverly, NY
 BMLH19990211KC
 Latitude: 42-03-48.30 N
 Longitude: 076-31-26.80 W
 ERP: 4.1 kW
 HAAT: 122 m
 Channel: 271
 Frequency: 102.1 MHz
 AMSL Height: 500 m

WATS

Sayre, PA
 BL19830301AE
 Latitude: 41-59-48 N
 Longitude: 076-30-03 W
 Frequency: 960
 Power: 5.0 kW Day

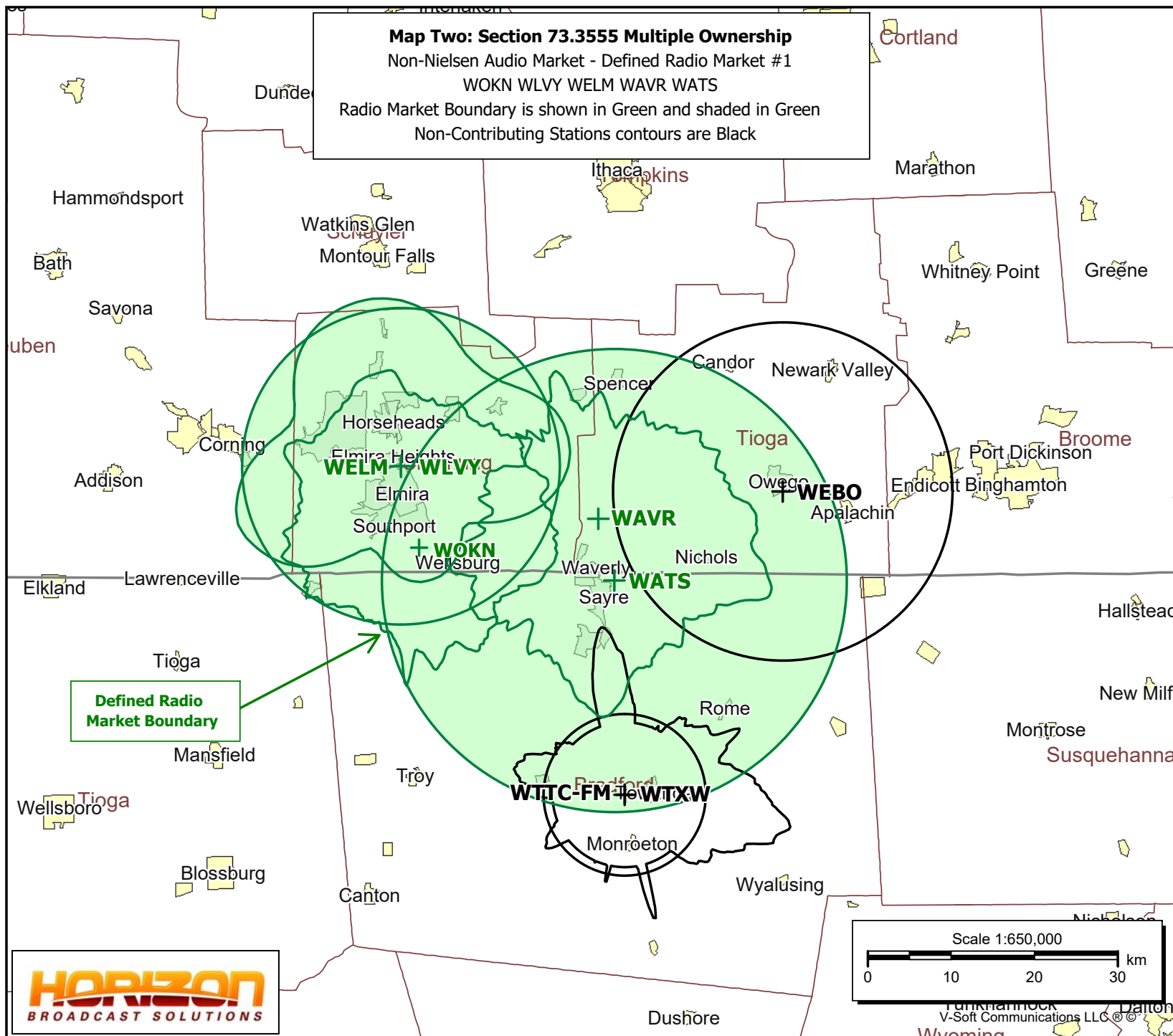
Map Two: Section 73.3555 Multiple Ownership

Non-Nielsen Audio Market - Defined Radio Market #1

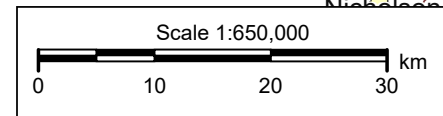
WOKN WLKY WELM WAVR WATS

Radio Market Boundary is shown in Green and shaded in Green

Non-Contributing Stations contours are Black



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WOKN

Southport, NY
 BLH20160311AAR
 Latitude: 42-01-55 N
 Longitude: 076-47-01 W
 ERP: 1.7 kW
 HAAT: 191 m
 Channel: 258
 Frequency: 99.5 MHz
 AMSL Height: 594 m

WELM

Elmira, NY
 BL19871026AH
 Latitude: 42-07-11 N
 Longitude: 076-48-37 W
 Frequency: 1410
 Power: 5.0 kW Day

WLTV

Elmira Hts - Horseheads, NY
 BL20030501ACS
 Latitude: 42-07-11 N
 Longitude: 076-48-37 W
 Frequency: 1600
 Power: 5.0 kW Day

WAVR

Waverly, NY
 BMLH19990211KC
 Latitude: 42-03-48.30 N
 Longitude: 076-31-26.80 W
 ERP: 4.10 kW
 HAAT: 122.0
 Channel: 271
 Frequency: 102.1 MHz
 AMSL Height: 500.0 m]

WATS

Sayre, PA
 BL19830301AE
 Latitude: 41-59-48 N
 Longitude: 076-30-03 W
 Frequency: 960 kHz
 Power: 5.0 kW

Map Three: Section 73.3555 Multiple Ownership

Non-Nielsen Audio Market - Defined Radio Market #1

WOKN WLTV WELM WAVR WATS

Subject Stations are Green

Radio Market Boundary is shown in Green and shaded in Green

Non-Contributing Stations contours are Black

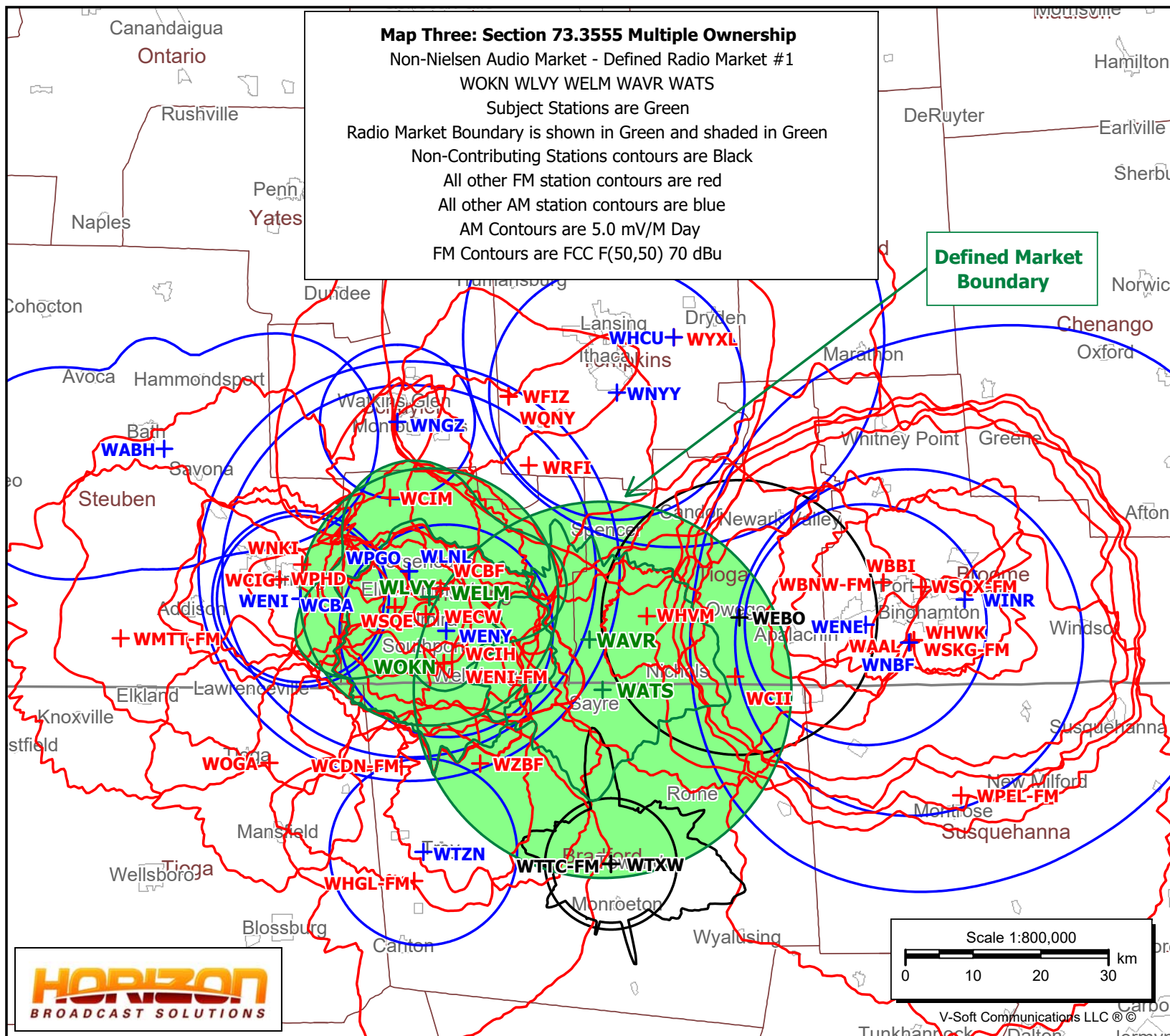
All other FM station contours are red

All other AM station contours are blue

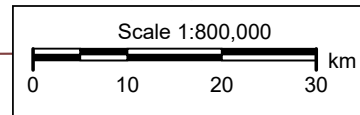
AM Contours are 5.0 mV/M Day

FM Contours are FCC F(50,50) 70 dBu

Defined Market Boundary



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WOKN

Southport, NY
 BLH20160311AAR
 Latitude: 42-01-55 N
 Longitude: 076-47-01 W
 ERP: 1.7 kW
 HAAT: 191 m
 Channel: 258
 Frequency: 99.5 MHz
 AMSL Height: 594 m

WELM

Elmira, NY
 BL19871026AH
 Latitude: 42-07-11 N
 Longitude: 076-48-37 W
 Frequency: 1410
 Power: 5.0 kW Day

WLKY

Elmira Hts - Horseheads, NY
 BL20030501ACS
 Latitude: 42-07-11 N
 Longitude: 076-48-37 W
 Frequency: 1600
 Power: 5.0 kW Day

WAVR

Waverly, NY
 BMLH19990211KC
 Latitude: 42-03-48.30 N
 Longitude: 076-31-26.80 W
 ERP: 4.10 kW
 HAAT: 122.0
 Channel: 271
 Frequency: 102.1 MHz
 AMSL Height: 500.0 m]

WATS

Sayre, PA
 BL19830301AE
 Latitude: 41-59-48 N
 Longitude: 076-30-03 W
 Frequency: 960 kHz
 Power: 5.0 kW

Map Four: Section 73.3555 Multiple Ownership (Close-Up West)

Non-Nielsen Audio Market - Defined Radio Market #1

WOKN WLKY WELM WAVR WATS

Subject Stations are Green

Radio Market Boundary is shown in Green and shaded in Green

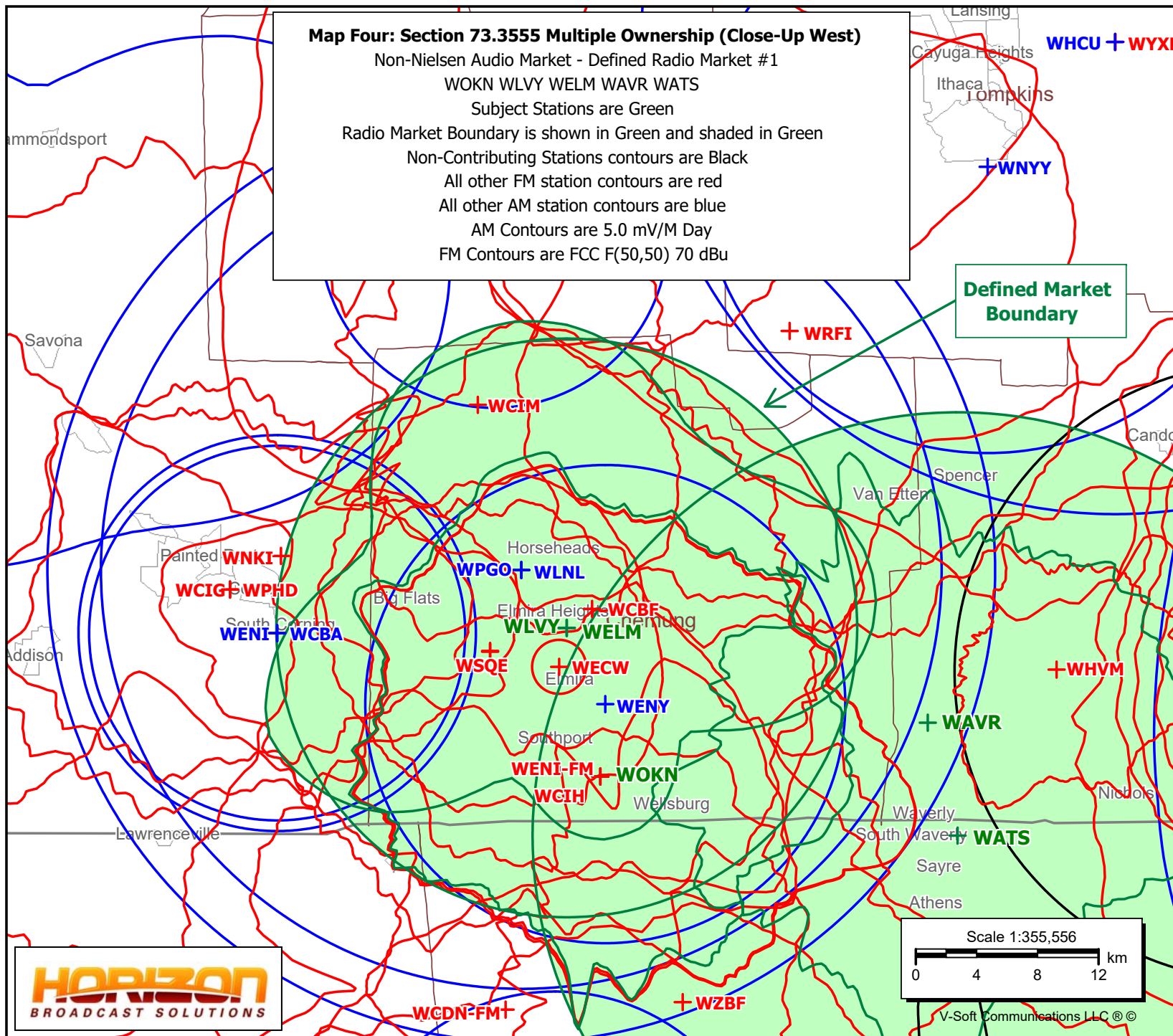
Non-Contributing Stations contours are Black

All other FM station contours are red

All other AM station contours are blue

AM Contours are 5.0 mV/M Day

FM Contours are FCC F(50,50) 70 dBu



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WOKN

Southport, NY
 BLH20160311AAR
 Latitude: 42-01-55 N
 Longitude: 076-47-01 W
 ERP: 1.7 kW
 HAAT: 191 m
 Channel: 258
 Frequency: 99.5 MHz
 AMSL Height: 594 m

WELM

Elmira, NY
 BL19871026AH
 Latitude: 42-07-11 N
 Longitude: 076-48-37 W
 Frequency: 1410
 Power: 5.0 kW Day

WLVY

Elmira Hts - Horseheads, NY
 BL20030501ACS
 Latitude: 42-07-11 N
 Longitude: 076-48-37 W
 Frequency: 1600
 Power: 5.0 kW Day

WAVR

Waverly, NY
 BMLH19990211KC
 Latitude: 42-03-48.30 N
 Longitude: 076-31-26.80 W
 ERP: 4.10 kW
 HAAT: 122.0
 Channel: 271
 Frequency: 102.1 MHz
 AMSL Height: 500.0 m]

WATS

Sayre, PA
 BL19830301AE
 Latitude: 41-59-48 N
 Longitude: 076-30-03 W
 Frequency: 960 kHz
 Power: 5.0 kW

Map Five: Section 73.3555 Multiple Ownership (Close-Up East)

Non-Nielsen Audio Market - Defined Radio Market #1

WOKN WLVY WELM WAVR WATS

Subject Stations are Green

Radio Market Boundary is shown in Green and shaded in Green

Non-Contributing Stations contours are Black

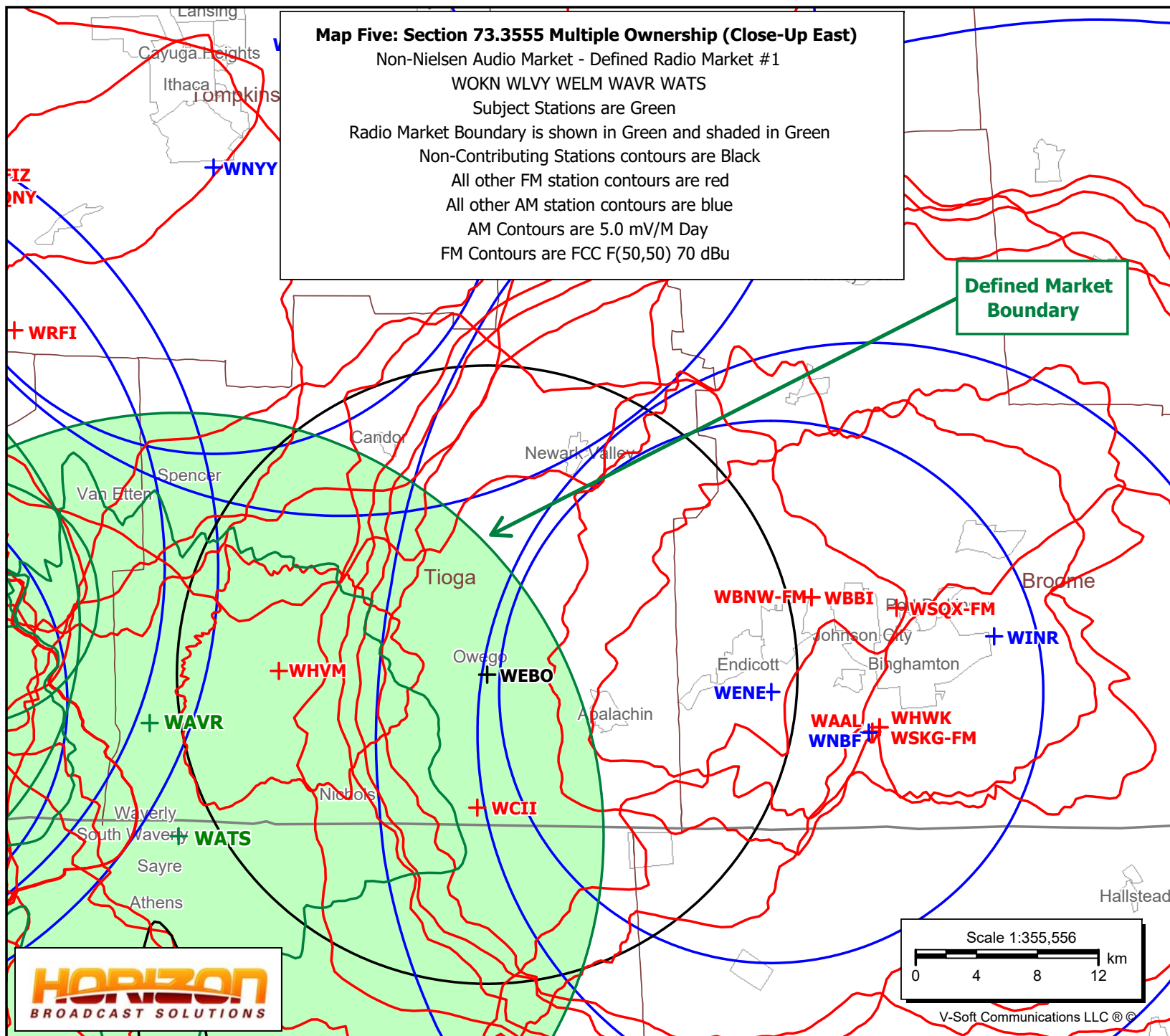
All other FM station contours are red

All other AM station contours are blue

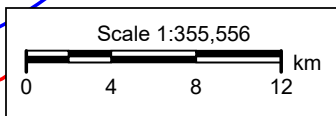
AM Contours are 5.0 mV/M Day

FM Contours are FCC F(50,50) 70 dBu

Defined Market Boundary



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TABLE ONE
Table of Contours Shown

Total number of overlapping contours: 49

Total number of common owned subject stations: 5

Total number of common owned non-contributing stations: 3

Total number of stations in Non-Nielsen Defined Radio Market: 46

Reference: Subject Stations

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WOKN	FM	258A Southport	NY	BLH20160311AAR	10.0	167.2
WAVR	FM	271A Waverly	NY	BMLH19990211KC	24.5	104.7
WATS	AM	960 SAYRE	PA	BL19830301AE	29.0	118.0
WELM	AM	1410 ELMIRA	NY	BL19871026AH	0.0	0.0
WLKY	AM	1600 ELMIRA HTS-HORSEHDS	NY	BL20030501ACS	0.0	0.0

Total Subject Stations: 5

Overlapping Contours:

Other FM Stations

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WMTQ	FM	201A Elmira	NY	BLED20110217ABY	5.3	253.3
WCII	FM	203B Spencer	NY	BLED19940523KA	46.7	104.4
WSKG-FM	FM	207B Binghamton	NY	BLED20040115ABK	71.8	94.9
WRFI	FM	209B1 Odessa	NY	0000205077	24.4	36.9
WCDN-FM	FM	212B1 Ridgebury	PA	BLED20181026AAW	25.4	189.1
WSQE	FM	216B1 Corning	NY	BLED19950830KA	5.3	252.7
WSQX-FM	FM	218A Binghamton	NY	BLED19950125KA	72.6	88.7
WHVM	FM	220A Owego	NY	BLED20141028ABN	32.2	94.9
WOGA	FM	222A Mansfield	PA	BLH20010821AAN	34.0	223.7
WENI-FM	FM	224A South Waverly	PA	BLH20171121AAU	10.0	167.2
WCIH	FM	232A Elmira	NY	0000204436	10.0	167.2
WMTT-FM	FM	234B1 Tioga	PA	BMLH20061214AAA	46.0	262.2
WTTC-FM⁽¹⁾	FM	237A Towanda	PA	BMLH20060906AAU	47.7	145.5
WFIZ	FM	238A Odessa	NY	BLH20080916ABN	31.9	21.3
WCBF	FM	241A Elmira	NY	BLH20180403AAA	2.1	53.1
WPEL-FM	FM	243B Montrose	PA	BLH4542	83.8	110.3
WZBF	FM	245A Ridgebury	PA	BLH20100607AAM	25.7	162.8
WYXL	FM	247B Ithaca	NY	BMLH20140219ABB	52.7	43.1
WCIG	FM	249A Big Flats	NY	0000136114	22.2	276.5
WHWK	FM	251B Binghamton	NY	BLH20040330AAY	71.8	94.9
WPHD	FM	254A Corning	NY	BLH19990422KF	22.2	276.5
WAAL	FM	256B Binghamton	NY	BLH20040608ABQ	71.4	95.2
WHGL-FM	FM	262B1 Canton	PA	BLH20190820AAK	42.0	182.8
WQNY	FM	279B Ithaca	NY	BLH20100518ACY	31.8	21.5
WCIM	FM	285A Montour Falls	NY	0000136040	15.8	338.2
WBNW-FM	FM	289B Endicott	NY	BMLH20070215ABR	67.1	88.0
WNKI	FM	291B Corning	NY	BLH19801118AH	19.3	284.1
WBBI	FM	298A Endwell	NY	BMLH20070328ACJ	67.1	88.0
WECW	FM	299D Elmira	NY	BLED19931105KA	2.6	191.1

Total Other FM Stations: 29

⁽¹⁾ Commonly owned stations that are not market contributors.

Other AM Stations

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WINR	AM	680	BINGHAMTON	NY	BL20000222AAC	79.0	90.1
WPGO	AM	820	HORSEHEADS	NY	BML20210225AAF	4.8	321.8
WHCU	AM	870	ITHACA	NY	BL20111031ALH	52.6	43.1
WLNL	AM	1000	HORSEHEADS	NY	BL19890303AH	4.8	321.8
WENY	AM	1230	ELMIRA	NY	BL20140602BEZ	5.6	153.2
WNBK	AM	1290	BINGHAMTON	NY	BL19991018AAO	71.2	95.
WZTN	AM	1310	TROY	PA	BL20020507ABB	37.6	181.1
WNGZ	AM	1490	WATKINS GLEN	NY	BL20100820ABY	26.3	349.5
WEBO⁽¹⁾	AM	1330	OWEGO	NY	BL20080923AEN	45.9	93.6
WCBA	AM	1350	CORNING	NY	BL19980615KE	19.0	269.0
WABH	AM	1380	BATH	NY	BL20070529AKB	44.8	299.0
WENE	AM	1430	ENDICOTT	NY	BMML20180227ABL	64.6	93.4
WENI	AM	1450	CORNING	NY	BL19980616AC	19.0	269.0
WNYN	AM	1470	ITHACA	NY	BL19810324AM	41.0	42.4
WTXW⁽¹⁾	AM	1550	TOWANDA	PA	BML1978	47.7	145.6

Total Other AM Stations: 15

⁽¹⁾ Commonly owned stations that are not market contributors.

Distance and bearing calculations from coordinates: 42-07-11 N, 076-48-37 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.