

Technical Report
In Support of
47 C.F.R. Section 73.3555
Based
Interim Contour Method Multiple
Ownership Studies

for

select stations within the
Saga Communications of New England, LLC
Keene, NH; Greenfield, MA; & Springfield MA Regions
"Interim Method Markets A-J & BIA Market Springfield, MA #102"

WAQY(FM) - SPRINGFIELD, MA (Facility ID: 58551)
WHAI(FM) - GREENFIELD, MA (Facility ID: 25833)
WHMP(AM) - NORTHAMPTON, MA (Facility ID: 46962)
WINQ(AM) - BRATTLEBORO, VT (Facility ID: 57781)
WINQ-FM - WINCHESTER, NH (Facility ID: 57228)
WIZZ(AM) - GREENFIELD, MA (Facility ID: 54779)
WKBK(AM) - KEENE, NH (Facility ID: 36833)
WKNE(FM) - KEENE, NH (Facility ID: 36834)
WKVT-FM - BRATTLEBORO, VT (Facility ID: 57780)
WLZX(AM) - EAST LONGMEADOW, MA (Facility ID: 58546)
WLZX-FM - NORTHAMPTON, MA (Facility ID: 46963)
WPVQ-FM - GREENFIELD, MA (Facility ID: 54780)
WRSI(FM) - TURNERS FALLS, MA (Facility ID: 8775)
WRSY(FM) - MARLBORO, VT (Facility ID: 17797)
WSNI(FM) - KEENE, NH (Facility ID: 9795)
WZBK(AM) - KEENE, NH (Facility ID: 57227)

EXPLANATION OF REPORT: This Technical Report has been prepared to determine the number of commercial and non-commercial principal community contours associated with the Transfer/Assignment applications for the below select Saga Communications of New England, LLC stations. These select stations address the general areas of Keene, NH; Greenfield, MA; & Springfield MA. Due to the complexity of the ten (10) interim method markets and one (1) Springfield, MA; BIA Market #102 associated with this grouping, this common report has been prepared regarding the below sixteen (16) Saga Communications of New England, LLC facilities. Ownership studies for other Saga Communications of New England, LLC stations, and other holdings associated with parent company Saga Communications, Inc., have been prepared separately. These Interim Contour-Overlap Methodology Studies have been prepared to address the unrated market portions for each filing. Compliance within the Springfield, MA; BIA Market #102 has been addressed herein, but also included in a separate showing.

Saga Communications of New England, LLC, presently holds a broadcast interest in sixteen (16) total aural services relevant to these Transfer/Assignment filings. Saga holdings not overlapping these stations need not be discussed herein. Concerning these relevant holdings, there will be ten (10) unique and distinct interim method markets within this affected ownership group and one (1) BIA market within this affected ownership group. "Market A" is comprised of five (5) stations. "Market B" is comprised of five (5) stations. "Market C" is comprised of five (5) stations. "Market D" is comprised of five (5) stations. "Market E" is comprised of three (3) stations. "Market F" is comprised of three (3) stations. "Market G" is comprised of five (5) stations. "Market H" is comprised of three (3) stations. "Market I" is comprised of three (3) stations. "Market J" is comprised of two (2) stations. Each market is defined as follows:

"Market A"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WZBK (AM)	1220	KEENE	NH	BL20031112AJD
WKBK (AM)	1290	KEENE	NH	BL20000810ABY
WKNE (FM)	279B	Keene	NH	0000124902
WINQ-FM	254A	Winchester	NH	BLH20090901AFA
WSNI (FM)	249A	Keene	NH	BLH20090901AFG

"Market B"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WKBK (AM)	1290	KEENE	NH	BL20000810ABY
WKNE (FM)	279B	Keene	NH	0000124902
WINQ-FM	254A	Winchester	NH	BLH20090901AFA
WSNI (FM)	249A	Keene	NH	BLH20090901AFG
WKVT-FM	224A	Brattleboro	VT	BMLH19900627KB

"Market C"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WINQ (AM)	1490	BRATTLEBORO	VT	BL10204
WKNE (FM)	279B	Keene	NH	0000124902
WINQ-FM	254A	Winchester	NH	BLH20090901AFA
WSNI (FM)	249A	Keene	NH	BLH20090901AFG
WKVT-FM	224A	Brattleboro	VT	BMLH19900627KB

"Market D"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WINQ(AM)	1490	BRATTLEBORO	VT	BL10204
WKNE(FM)	279B	Keene	NH	0000124902
WKVT-FM	224A	Brattleboro	VT	BMLH19900627KB
WRSY(FM)	268A	Marlboro	VT	BLH19960830KA
WPVQ-FM	237A	Greenfield	MA	BLH20180405AAL

"Market E"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WPVQ-FM	237A	Greenfield	MA	BLH20180405AAL
WKVT-FM	224A	Brattleboro	VT	BMLH19900627KB
WRSI(FM)	230A	Turners Falls	MA	0000168026

"Market F"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WKNE(FM)	279B	Keene	NH	0000124902
WRSI(FM)	230A	Turners Falls	MA	0000168026
WPVQ-FM	237A	Greenfield	MA	BLH20180405AAL

"Market G"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WIZZ(AM)	1520	GREENFIELD	MA	BL20230411AAD
WRSI(FM)	230A	Turners Falls	MA	0000168026
WHAI(FM)	252A	Greenfield	MA	0000168024
WPVQ-FM	237A	Greenfield	MA	BLH20180405AAL
WLZX-FM	257A	Northampton	MA	BLH20000112ABC

"Market H"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WHMP(AM)	1400	NORTHAMPTON	MA	BL8673
WLZX-FM	257A	Northampton	MA	BLH20000112ABC
WRSI(FM)	230A	Turners Falls	MA	0000168026

"Market I"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WHMP(AM)	1400	NORTHAMPTON	MA	BL8673
WLZX-FM	257A	Northampton	MA	BLH20000112ABC
WAQY(FM)	271B	Springfield	MA	BMLH19930514KA

"Market J"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WLZX(AM)	1600	EAST LONGMEADOW	MA	BML20170131AEU
WAQY(FM)	271B	Springfield	MA	BMLH19930514KA

BIA Springfield, MA Market #102

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WHMP(AM)	1400	NORTHAMPTON	MA	BL8673
WLZX(AM)	1600	EAST LONGMEADOW	MA	BML20170131AEU
WAQY(FM)	271B	Springfield	MA	BMLH19930514KA
WLZX-FM	257A	Northampton	MA	BLH20000112ABC

EXPLANATION OF METHODOLOGY: The facilities and results reported herein were taken from current copies of AM and FM computer databases as prepared by the FCC and supplied by V-Soft Communications, LLC. The facilities listed above serve as the basis for the respective principal community contours studied. The accuracy of the results of these studies 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 M3 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 47 C.F.R. Section 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 dBμ) contour as provided in 47 C.F.R. Section 73.313 of the Rules. The predicted FM contours shown in this report are based on seventy-two (72) equally spaced terrain radials beginning with 0° True and assume NED 03 Second Terrain data.

As stated before, there will be ten (10) unique and distinct interim method markets within this affected ownership group and one (1) BIA market within this affected ownership group. The interim markets have been defined, in accordance with 47 C.F.R. Section 73.3555 of the FCC Rules, as the area within the total perimeter formed by the combined principal community contours of each relevant interim market as noted above.

EXPLANATION OF RESULTS: The sixteen (16) stations, under common control and relevant for these ownership groupings, have been noted in **Exhibit 1.0**. As stated before, no other Saga Communications of New England, LLC holdings, or any other holdings of parent company Saga Communications, Inc, are affected by these stations. To aid in identifying the respective contours, currently controlled AM contours have been shown with solid light red lines. Currently controlled FM contours have been shown with varying-colored solid lines. The "Market A, B, C, D, E, F, G, H, I & J" common overlap areas have been designated as well.

"Market A"				
<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WZBK (AM)	1220	KEENE	NH	BL20031112AJD
WKBK (AM)	1290	KEENE	NH	BL20000810ABY
WKNE (FM)	279B	Keene	NH	0000124902
WINQ-FM	254A	Winchester	NH	BLH20090901AFA
WSNI (FM)	249A	Keene	NH	BLH20090901AFG

For "Market A", the market defining contours have been shown in **Exhibit 2.0** of this report along with a total number of principal community contours entering the market. The defining contours have been shown with yellow lines on this map. AM contours entering the market have been denoted in blue lines. FM contour entering the market have been shown in red lines. As stated before, the contours shown represent the total number of stations entering or defining the market. Co-owned stations entering the market, but not defining the market have been omitted. Under the current rules, the market falls within the minimum limitations set forth in §73.3555 (a)(1)(iii): *In a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM) may be owned.* The principal community contours of twenty-three (23) other stations entering the market are shown in **Exhibit 2.0**. Including the two (2) AM and three (3) FM station(s) which define the market, there are twenty-eight (28) aural services in this market. **Exhibit 2.1** lists the facilities of the individual stations used in this report.

"Market B"				
<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WKBK (AM)	1290	KEENE	NH	BL20000810ABY
WKNE (FM)	279B	Keene	NH	0000124902
WINQ-FM	254A	Winchester	NH	BLH20090901AFA
WSNI (FM)	249A	Keene	NH	BLH20090901AFG
WKVT-FM	224A	Brattleboro	VT	BMLH19900627KB

For "Market B", the market defining contours have been shown in **Exhibit 3.0** of this report along with a total number of principal community contours entering the market. The defining contours have been shown with yellow lines on this map. AM contours entering the market have been denoted in blue lines. FM contour entering the market have been shown in red lines. As stated before, the contours shown represent the total number of stations entering or defining the market. Co-owned stations entering the market, but not defining the market have been omitted. Under the current rules, the market falls within the minimum limitations set forth in §73.3555 (a)(1)(iii): *In a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM) may be owned.* The principal community contours of twenty-three (23) other stations entering the market are shown in **Exhibit 3.0**. Including the one (1) AM and four (4) FM station(s) which define the market, there are twenty-eight (28) aural services in this market. **Exhibit 3.1** lists the facilities of the individual stations used in this report.

"Market C"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WINQ (AM)	1490	BRATTLEBORO	VT	BL10204
WKNE (FM)	279B	Keene	NH	0000124902
WINQ-FM	254A	Winchester	NH	BLH20090901AFA
WSNI (FM)	249A	Keene	NH	BLH20090901AFG
WKVT-FM	224A	Brattleboro	VT	BMLH19900627KB

For "Market C", the market defining contours have been shown in **Exhibit 4.0** of this report along with a total number of principal community contours entering the market. The defining contours have been shown with yellow lines on this map. AM contours entering the market have been denoted in blue lines. FM contour entering the market have been shown in red lines. As stated before, the contours shown represent the total number of stations entering or defining the market. Co-owned stations entering the market, but not defining the market have been omitted. Under the current rules, the market falls within the minimum limitations set forth in §73.3555 (a)(1)(iii): *In a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM) may be owned.* The principal community contours of twenty-three (23) other stations entering the market are shown in **Exhibit 4.0**. Including the one (1) AM and four (4) FM station(s) which define the market, there are twenty-eight (28) aural services in this market. **Exhibit 4.1** lists the facilities of the individual stations used in this report.

"Market D"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WINQ (AM)	1490	BRATTLEBORO	VT	BL10204
WKNE (FM)	279B	Keene	NH	0000124902
WKVT-FM	224A	Brattleboro	VT	BMLH19900627KB
WRSY (FM)	268A	Marlboro	VT	BLH19960830KA
WPVQ-FM	237A	Greenfield	MA	BLH20180405AAL

For "Market D", the market defining contours have been shown in **Exhibit 5.0** of this report along with a total number of principal community contours entering the market. The defining contours have been shown with yellow lines on this map. AM contours entering the market have been denoted in blue lines. FM contour entering the market have been shown in red lines. As stated before, the contours shown represent the total number of stations entering or defining the market. Co-owned stations entering the market, but not defining the market have been omitted. Under the current rules, the market falls within the minimum limitations set forth in §73.3555(a)(1)(ii): *In a radio market with between 30 and 44 (inclusive) full-power, commercial and noncommercial radio stations, not more than 7 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM) may be owned.* The principal community contours of twenty-eight (28) other stations entering the market are shown in **Exhibit 5.0**. Including the one (1) AM and four (4) FM station(s) which define the market, there are thirty-three (33) aural services in this market. **Exhibit 5.1** lists the facilities of the individual stations used in this report.

"Market E"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WPVQ-FM	237A	Greenfield	MA	BLH20180405AAL
WKVT-FM	224A	Brattleboro	VT	BMLH19900627KB
WRSI (FM)	230A	Turners Falls	MA	0000168026

For "Market E", the market defining contours have been shown in **Exhibit 6.0** of this report along with a total number of principal community contours entering the market. The defining contours have been shown with yellow lines on this map. AM contours entering the market have been denoted in blue lines. FM contour entering the market have been shown in red lines. As stated before, the contours shown represent the total number of stations entering or defining the market. Co-owned stations entering the market, but not defining the market have been omitted. Under the current rules, the market falls within the minimum limitations set forth in §73.3555 (a)(1)(iii): *In a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM) may be owned.* The principal community contours of twenty-three (23) other stations entering the market are shown in **Exhibit 6.0**. Including the three (3) FM station(s) which define the market, there are twenty-six (26) aural services in this market. **Exhibit 6.1** lists the facilities of the individual stations used in this report.

"Market F"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WKNE (FM)	279B	Keene	NH	0000124902
WRSI (FM)	230A	Turners Falls	MA	0000168026
WPVQ-FM	237A	Greenfield	MA	BLH20180405AAL

For "Market F", the market defining contours have been shown in **Exhibit 7.0** of this report along with a total number of principal community contours entering the market. The defining contours have been shown with yellow lines on this map. AM contours entering the market have been denoted in blue lines. FM contour entering the market have been shown in red lines. As stated before, the contours shown represent the total number of stations entering or defining the market. Co-owned stations entering the market, but not defining the market have been omitted. Under the current rules, the market falls within the minimum limitations set forth in §73.3555(a)(1)(ii): *In a radio market with between 30 and 44 (inclusive) full-power, commercial and noncommercial radio stations, not more than 7 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM) may be owned.* The principal community contours of thirty-four (34) other stations entering the market are shown in **Exhibit 7.0**. Including the three (3) FM station(s) which define the market, there are thirty-seven (37) aural services in this market. **Exhibit 7.1** lists the facilities of the individual stations used in this report.

"Market G"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WIZZ (AM)	1520	GREENFIELD	MA	BL20230411AAD
WRSI (FM)	230A	Turners Falls	MA	0000168026
WHAI (FM)	252A	Greenfield	MA	0000168024
WPVQ-FM	237A	Greenfield	MA	BLH20180405AAL
WLZX-FM	257A	Northampton	MA	BLH20000112ABC

For "Market G", the market defining contours have been shown in **Exhibit 8.0** of this report along with a total number of principal community contours entering the market. The defining contours have been shown with yellow lines on this map. AM contours entering the market have been denoted in blue lines. FM contour entering the market have been shown in red lines. As stated before, the contours shown represent the total number of stations entering or defining the market. Co-owned stations entering the market, but not defining the market have been omitted. Under the current rules, the market falls within the minimum limitations set forth in §73.3555(a)(1)(ii): *In a radio market with between 30 and 44 (inclusive) full-power, commercial and noncommercial radio stations, not more than 7 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM) may be owned.* The principal community contours of twenty-five (25) other stations entering the market are shown in **Exhibit 8.0**. Including the one (1) AM and four (4) FM station(s) which define the market, there are thirty (30) aural services in this market. **Exhibit 8.1** lists the facilities of the individual stations used in this report.

"Market H"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WHMP (AM)	1400	NORTHAMPTON	MA	BL8673
WLZX-FM	257A	Northampton	MA	BLH20000112ABC
WRSI (FM)	230A	Turners Falls	MA	0000168026

For "Market H", the market defining contours have been shown in **Exhibit 9.0** of this report along with a total number of principal community contours entering the market. The defining contours have been shown with yellow lines on this map. AM contours entering the market have been denoted in blue lines. FM contour entering the market have been shown in red lines. As stated before, the contours shown represent the total number of stations entering or defining the market. Co-owned stations entering the market, but not defining the market have been omitted. Under the current rules, the market falls within the minimum limitations set forth in §73.3555 (a)(1)(iii): *In a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM) may be owned.* The principal community contours of twenty-four (24) other stations entering the market are shown in **Exhibit 9.0**. Including the one (1) AM and two (2) FM station(s) which define the market, there are twenty-seven (27) aural services in this market. **Exhibit 9.1** lists the facilities of the individual stations used in this report.

"Market I"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WHMP (AM)	1400	NORTHAMPTON	MA	BL8673
WLZX-FM	257A	Northampton	MA	BLH20000112ABC
WAQY (FM)	271B	Springfield	MA	BMLH19930514KA

For "Market I", the market defining contours have been shown in **Exhibit 10.0** of this report along with a total number of principal community contours entering the market. The defining contours have been shown with yellow lines on this map. AM contours entering the market have been denoted in blue lines. FM contour entering the market have been shown in red lines. As stated before, the contours shown represent the total number of stations entering or defining the market. Co-owned stations entering the market, but not defining the market have been omitted. Under the current rules, the market falls within the minimum limitations set forth in §73.3555(a)(1)(i): *In a radio market with 45 or more full-power, commercial and noncommercial radio stations, not more than 8 commercial radio stations in total and not more than 5 commercial stations in the same service (AM or FM) may be owned.* The principal community contours of fifty (50) other stations entering the market are shown in **Exhibit 10.0**. Including the one (1) AM and two (2) FM station(s) which define the market, there are fifty-three (53) aural services in this market. **Exhibit 10.1** lists the facilities of the individual stations used in this report.

"Market J"

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WLZX(AM)	1600	EAST LONGMEADOW	MA	BML20170131AEU
WAQY(FM)	271B	Springfield	MA	BMLH19930514KA

For "Market J", the market defining contours have been shown in **Exhibit 11.0**. The defining contours have been shown with yellow lines on this map. Under the latter provisions as set forth in §73.3555(a)(1)(iv): *...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 radio stations in such market unless the combination of stations comprises not more than one AM and one FM station.* As the above ownership one (1) AM and one (1) FM station falls under the latter provision of §73.3555(a)(1)(iv), the market is categorically permitted. **Exhibit 11.1** lists the facilities of the individual stations used in this report.

BIA Springfield, MA Market #102

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WHMP(AM)	1400	NORTHAMPTON	MA	BL8673
WLZX(AM)	1600	EAST LONGMEADOW	MA	BML20170131AEU
WAQY(FM)	271B	Springfield	MA	BMLH19930514KA
WLZX-FM	257A	Northampton	MA	BLH20000112ABC

A separate BIA Springfield, MA Market #102 count has been provided independent from this report. Under the current rules, the BIA Springfield, MA Market #102 falls within the minimum limitations set forth in §73.3555 (a)(1)(iii): *In a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM) may be owned.* Including the two (2) AM and two (2) FM station(s) which are co-owned, there are twenty-seven (27) aural services in the BIA Springfield, MA Market #102 count. As stated before, a separate BIA Springfield, MA Market #102 count has been provided independent from this report

CERTIFICATION OF TECHNICAL CONSULTANT: *I declare, under penalty of perjury, that the contents of this report are true and accurate to the best of my knowledge and belief. I further certify I have over twenty-four years of experience as a broadcast technical consultant before the Federal Communications Commission ("the FCC"); and am familiar with the Code of Federal Regulations Title 47 ("the Rules") as pertaining to this report and its contents herein. The underlying data utilized in this report was taken directly from FCC databases or indirectly through third party software vendors securing data directly from FCC databases. This firm cannot be held liable for errors or omissions resulting from the underlying data. The information contained herein is believed accurate to the date reported below.*



Justin W. Asher
Technical Consultant
July 1, 2023

Lebanon-Hanover-White River Junction, NH-VT BIA Market (217)

Exhibit 1.0 Map of Commonly Owned Stations

AM Contours: Daytime 5.0 mV/m
 Map M3 Ground Conductivity
 NAD 1983 Coordinate Datum

FM Contours: 70 dBμ F(50:50)
 NED 03 sec Terrain Database
 NAD 1983 Coordinate Datum

"Market A" Defining Contours
 WZBK(AM) - KEENE, NH
 WKBK(AM) - KEENE, NH
 WKNE(FM) - Keene, NH
 WINQ-FM - Winchester, NH
 WSNI(FM) - Keene, NH

"Market B" Defining Contours
 WKBK(AM) - KEENE, NH
 WKNE(FM) - Keene, NH
 WINQ-FM - Winchester, NH
 WSNI(FM) - Keene, NH
 WKVT-FM - Brattleboro, VT

"Market C" Defining Contours
 WINQ(AM) - BRATTLEBORO, VT
 WKNE(FM) - Keene, NH
 WINQ-FM - Winchester, NH
 WSNI(FM) - Keene, NH
 WKVT-FM - Brattleboro, VT

"Market D" Defining Contours
 WINQ(AM) - BRATTLEBORO, VT
 WKNE(FM) - Keene, NH
 WKVT-FM - Brattleboro, VT
 WRSY(FM) - Marlboro, VT
 WPVQ-FM - Greenfield, MA

"Market E" Defining Contours
 WPVQ-FM - Greenfield, MA
 WKVT-FM - Brattleboro, VT
 WRSI(FM) - Turners Falls, MA

"Market F" Defining Contours
 WKNE(FM) - Keene, NH
 WRSI(FM) - Turners Falls, MA
 WPVQ-FM - Greenfield, MA

Asher Broadcast Consulting LLC
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"Market G" Defining Contours
 WIZZ(AM) - GREENFIELD, MA
 WRSI(FM) - Turners Falls, MA
 WHAI(FM) - Greenfield, MA
 WPVQ-FM - Greenfield, MA
 WLZX-FM - Northampton, MA

"Market H" Defining Contours
 WHMP(AM) - NORTHAMPTON, MA
 WLZX-FM - Northampton, MA
 WRSI(FM) - Turners Falls, MA

"Market I" Defining Contours
 WHMP(AM) - NORTHAMPTON, MA
 WLZX-FM - Northampton, MA
 WAQY(FM) - Springfield, MA

"Market J" Defining Contours
 WLZX(AM) - EAST LONGMEADOW, MA
 WAQY(FM) - Springfield, MA

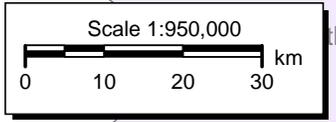
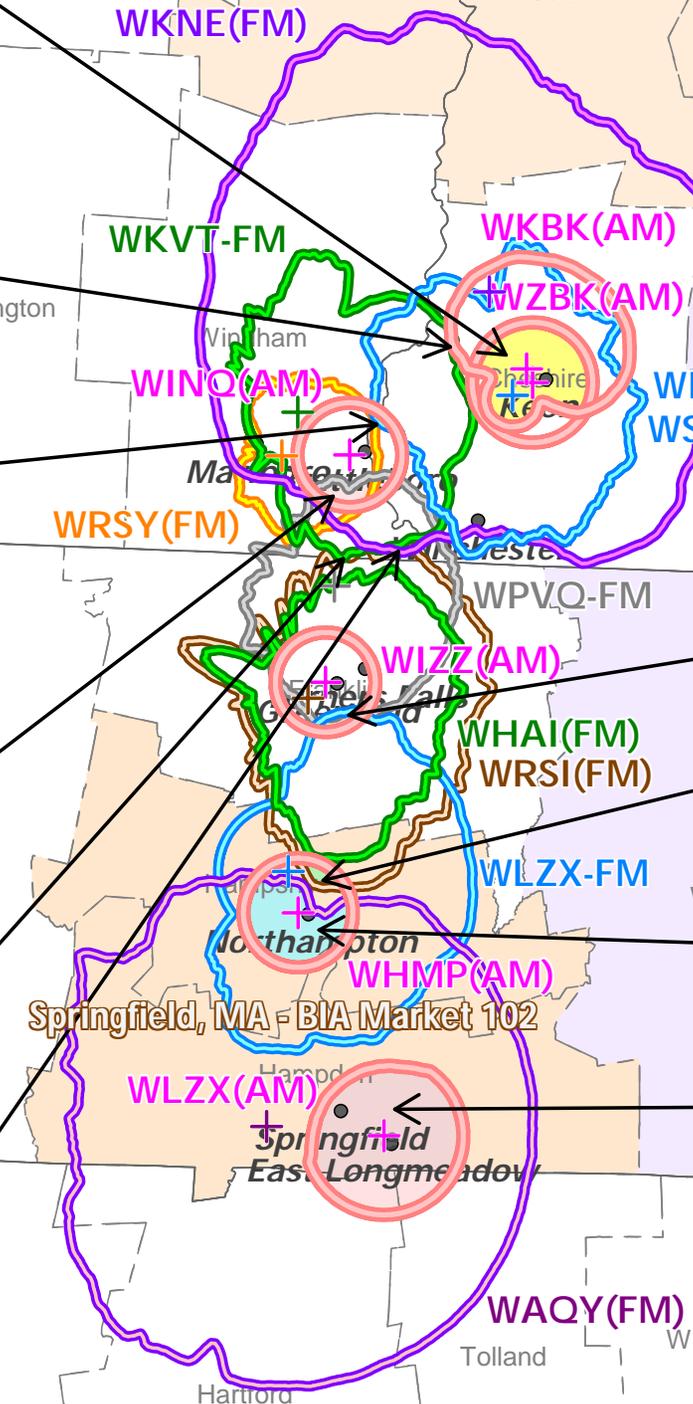


Exhibit 2.1

Tabulation of Select Stations Entering "Market A"

Total number of overlapping contours: 28

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WZBK(AM)	AM	1220 KEENE	NH	BL20031112AJD	0.0	0.0
WKBK(AM)	AM	1290 KEENE	NH	BL20000810ABY	1.9	336.6
WKNE(FM)	FM	279B Keene	NH	0000124902	12.7	334.4
WINQ-FM	FM	254A Winchester	NH	BLH20090901AFA	3.0	237.2
WSNI(FM)	FM	249A Keene	NH	BLH20090901AFG	3.0	237.2

Overlapping Contours:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WVKJ	FM	210A Dublin	NH	BLED20111207AES	15.0	103.2
WEVN	FM	214B1 Keene	NH	BMLD20030815ADI	12.7	334.4
WKNH	FM	217A Keene	NH	BLED19960202KB	1.6	105.5
WDER-FM	FM	221A Peterborough	NH	BLH20010828AAS	35.3	102.4
WEY	FM	228A Swanzey	NH	BLH20080912AAG	3.0	237.0
WFYX	FM	242A Walpole	NH	BLH20131115BFI	25.4	334.8
WYRY	FM	285A Hinsdale	NH	BLH20010402AAV	21.3	216.3
WHDQ	FM	291B Claremont	NH	BMLH20120912AAU	57.7	347.7
WAMC-FM	FM	212B Albany	NY	BMLD20101102ABH	78.2	245.7
WNCH	FM	201B Norwich	VT	BMLD20120821ABW	57.7	347.7
WVBA	FM	205B1 Brattleboro	VT	BLED20180712AAL	27.0	245.2
WVPR	FM	208B Windsor	VT	BMLD20120821ABT	57.7	347.7
WOOL	FM	218A Bellows Falls	VT	BLED20140212ACZ	25.4	334.8
WCMK	FM	220A Putney	VT	BMLD20061115ABH	25.2	281.3
WTSA-FM	FM	244A Brattleboro	VT	BLH19910821KF	25.9	259.9
WTHK	FM	264A Wilmington	VT	BLH19991215ABK	50.9	273.8
WKKN	FM	270A Westminster	VT	BLH20080409AAH	12.7	334.4
WEQX	FM	274B Manchester	VT	BMLH20070625ACM	71.4	291.8
WZLF	FM	296A Bellows Falls	VT	BMLH19920522KC	31.1	355.2
WTSA	AM	1450 BRATTLEBORO	VT	BL8900	22.2	252.6
WCNL	AM	1010 NEWPORT	NH	BL20031103ADH	49.2	11.4
WTSV	AM	1230 CLAREMONT	NH	BL8351	49.0	357.3
WCFR	AM	1480 SPRINGFIELD	VT	BL20170131AEV	41.8	338.6

Distance and bearing calculations from coordinates: 42-55-50 N, 072-18-00 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.

*** Co-owned stations entering, but not defining the market, have been excluded.**

*** Stations more than 92 km from the common area have been excluded.**

Exhibit 3.0 Map of Stations Entering "Market B"

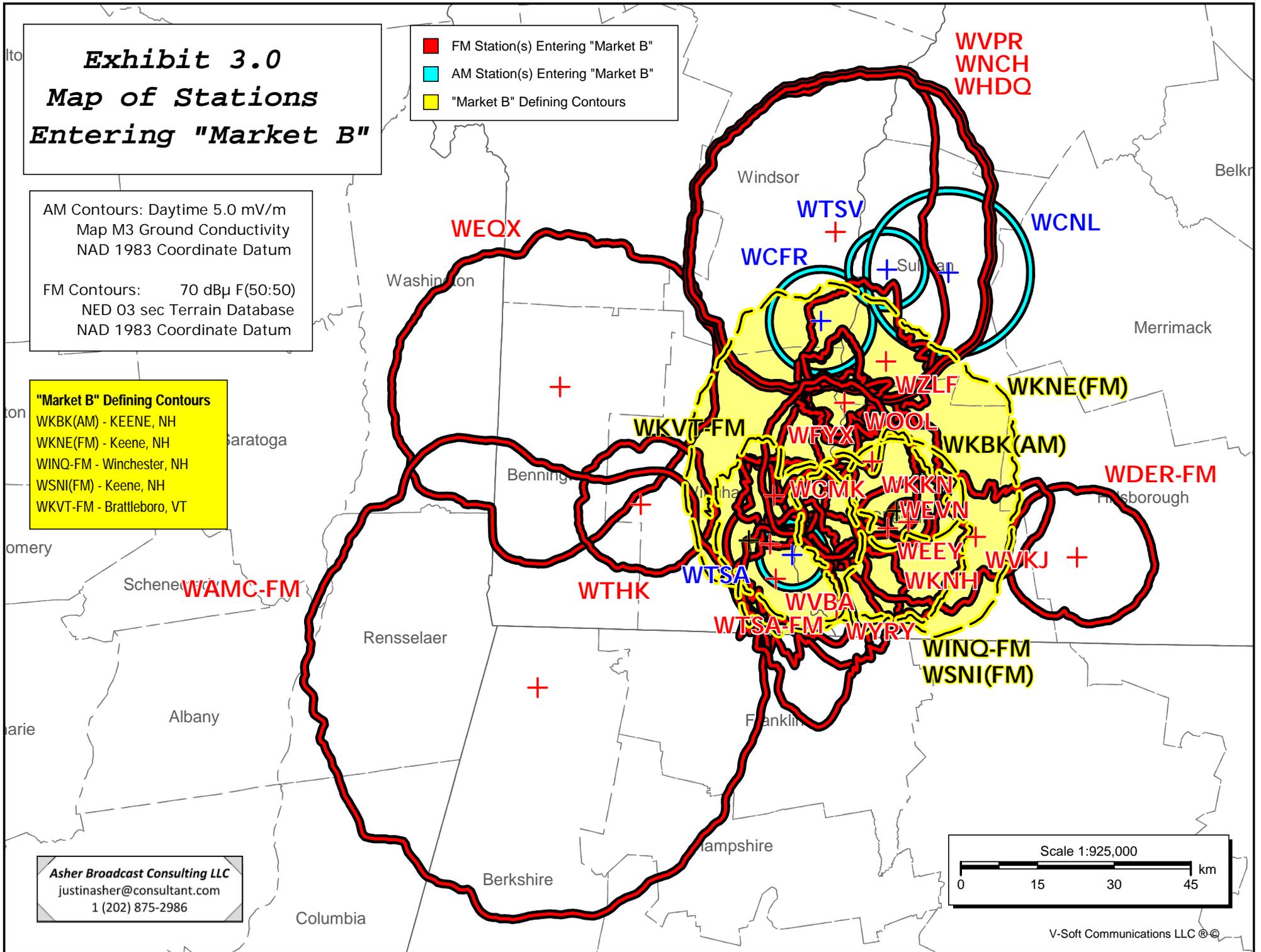
- FM Station(s) Entering "Market B"
- AM Station(s) Entering "Market B"
- "Market B" Defining Contours

AM Contours: Daytime 5.0 mV/m
Map M3 Ground Conductivity
NAD 1983 Coordinate Datum

FM Contours: 70 dBμ F(50:50)
NED 03 sec Terrain Database
NAD 1983 Coordinate Datum

"Market B" Defining Contours

- WKBK(AM) - KEENE, NH
- WKNE(FM) - Keene, NH
- WINQ-FM - Winchester, NH
- WSNI(FM) - Keene, NH
- WKVT-FM - Brattleboro, VT



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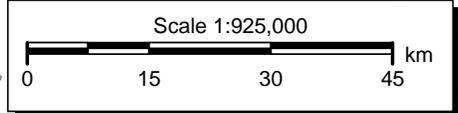


Exhibit 3.1

Tabulation of Select Stations Entering "Market B"

Total number of overlapping contours: 28

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WKBK(AM)	AM	1290	KEENE	NH	BL20000810ABY	0.0	0.0
WKNE(FM)	FM	279B	Keene	NH	0000124902	10.8	334.0
WINQ-FM	FM	254A	Winchester	NH	BLH20090901AFA	3.8	207.9
WSNI(FM)	FM	249A	Keene	NH	BLH20090901AFG	3.8	207.9
WKVT-FM	FM	224A	Brattleboro	VT	BMLH19900627KB	29.4	259.2

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WVKJ	FM	210A	Dublin	NH	BLED20111207AES	16.2	108.5
WEVN	FM	214B1	Keene	NH	BMLD20030815ADI	10.8	334.0
WKNH	FM	217A	Keene	NH	BLED19960202KB	3.1	133.3
WDER-FM	FM	221A	Peterborough	NH	BLH20010828AAS	36.4	104.8
WEFY	FM	228A	Swanzy	NH	BLH20080912AAG	3.8	207.6
WVYX	FM	242A	Walpole	NH	BLH20131115BFI	23.5	334.7
WYRY	FM	285A	Hinsdale	NH	BLH20010402AAV	22.3	212.1
WHDQ	FM	291B	Claremont	NH	BMLH20120912AAU	55.8	348.1
WAMC-FM	FM	212B	Albany	NY	BMLD20101102ABH	78.2	244.3
WNCH	FM	201B	Norwich	VT	BMLD20120821ABW	55.8	348.1
WVBA	FM	205B1	Brattleboro	VT	BLED20180712AAL	27.1	241.2
WVPR	FM	208B	Windsor	VT	BMLD20120821ABT	55.8	348.1
WOOL	FM	218A	Bellows Falls	VT	BLED20140212ACZ	23.5	334.7
WCMK	FM	220A	Putney	VT	BMLD20061115ABH	24.2	277.6
WTSB-FM	FM	244A	Brattleboro	VT	BLH19910821KF	25.6	255.8
WTHK	FM	264A	Wilmington	VT	BLH19991215ABK	50.1	271.9
WKKN	FM	270A	Westminster	VT	BLH20080409AAH	10.8	334.0
WEQX	FM	274B	Manchester	VT	BMLH20070625ACM	70.1	290.7
WZLF	FM	296A	Bellows Falls	VT	BMLH19920522KC	29.3	356.3
WTSB	AM	1450	BRATTLEBORO	VT	BL8900	22.1	247.7
WCNL	AM	1010	NEWPORT	NH	BL20031103ADH	47.7	12.7
WTSV	AM	1230	CLAREMONT	NH	BL8351	47.2	358.1
WCFR	AM	1480	SPRINGFIELD	VT	BL20170131AEV	40.0	338.7

Distance and bearing calculations from coordinates: 42-56-46 N, 072-18-33 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

*** Co-owned stations entering, but not defining the market, have been excluded.**

*** Stations more than 92 km from the common area have been excluded.**

Exhibit 4.0 Map of Stations Entering "Market C"

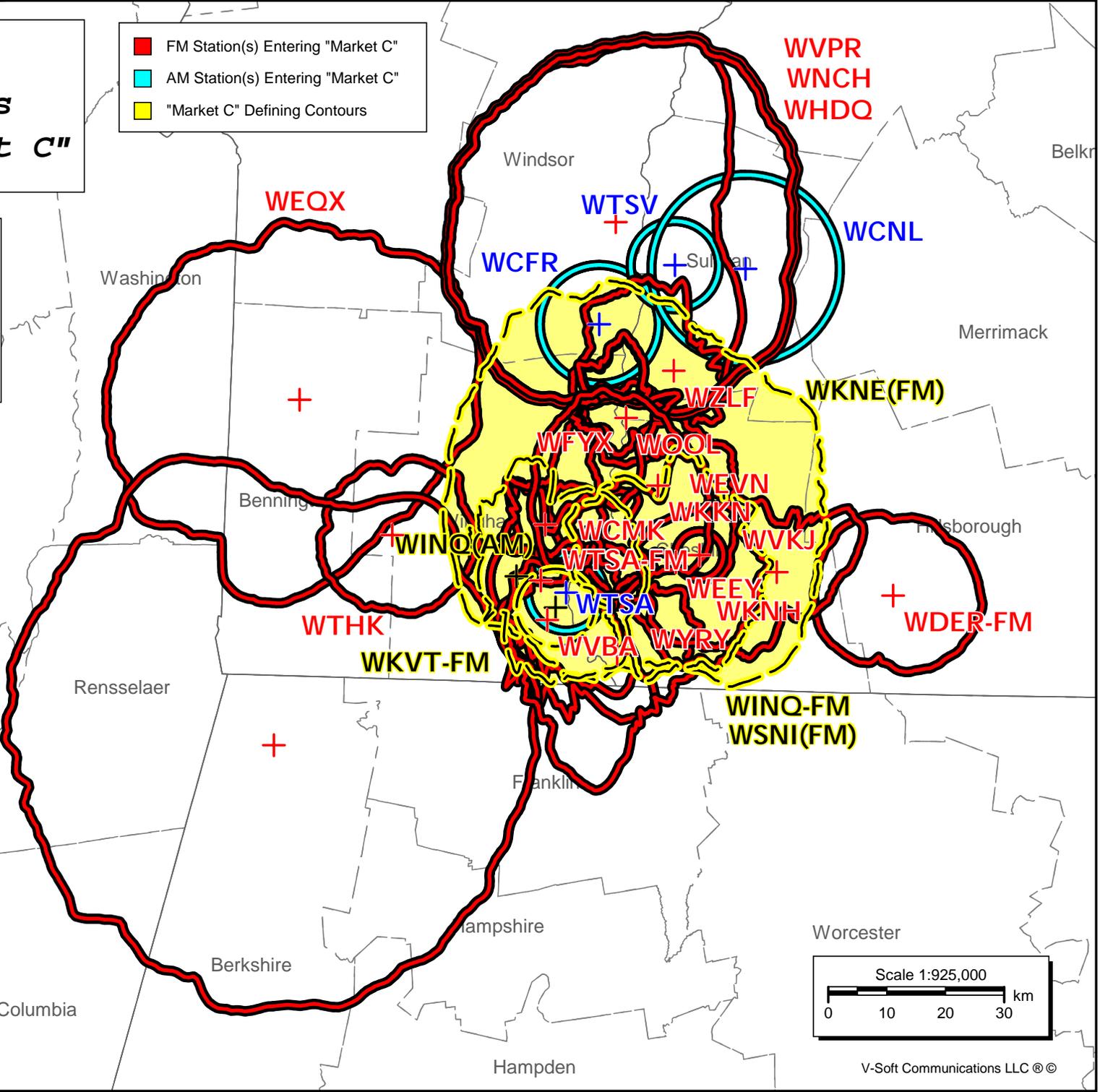
- FM Station(s) Entering "Market C"
- AM Station(s) Entering "Market C"
- "Market C" Defining Contours

AM Contours: Daytime 5.0 mV/m
Map M3 Ground Conductivity
NAD 1983 Coordinate Datum

FM Contours: 70 dBμ F(50:50)
NED 03 sec Terrain Database
NAD 1983 Coordinate Datum

"Market C" Defining Contours

- WINQ(AM) - BRATTLEBORO, VT
- WKNE(FM) - Keene, NH
- WINQ-FM - Winchester, NH
- WSNI(FM) - Keene, NH
- WKVT-FM - Brattleboro, VT



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Scale 1:925,000
0 10 20 30 km

Exhibit 4.1

Tabulation of Select Stations Entering "Market C"

Total number of overlapping contours: 28

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WINQ(AM)	AM	1490	BRATTLEBORO	VT	BL10204	0.0	0.0
WKNE(FM)	FM	279B	Keene	NH	0000124902	27.1	40.3
WINQ-FM	FM	254A	Winchester	NH	BLH20090901AFA	21.9	69.6
WSNI(FM)	FM	249A	Keene	NH	BLH20090901AFG	21.9	69.6
WKVT-FM	FM	224A	Brattleboro	VT	BMLH19900627KB	8.5	309.1

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WVKJ	FM	210A	Dublin	NH	BLED20111207AES	38.2	81.1
WEVN	FM	214B1	Keene	NH	BMLD20030815ADI	27.1	40.3
WKNH	FM	217A	Keene	NH	BLED19960202KB	26.1	70.2
WDER-FM	FM	221A	Peterborough	NH	BLH20010828AAS	57.5	88.2
WEY	FM	228A	Swanzy	NH	BLH20080912AAG	21.9	69.6
WFYX	FM	242A	Walpole	NH	BLH20131115BFI	34.4	20.7
WYRY	FM	285A	Hinsdale	NH	BLH20010402AAV	13.1	127.2
WHDQ	FM	291B	Claremont	NH	BMLH20120912AAU	66.4	9.2
WAMC-FM	FM	212B	Albany	NY	BMLD20101102ABH	53.4	244.2
WNCH	FM	201B	Norwich	VT	BMLD20120821ABW	66.4	9.2
WVBA	FM	205B1	Brattleboro	VT	BLED20180712AAL	2.5	213.9
WVPR	FM	208B	Windsor	VT	BMLD20120821ABT	66.4	9.2
WOOL	FM	218A	Bellows Falls	VT	BLED20140212ACZ	34.4	20.7
WCMK	FM	220A	Putney	VT	BMLD20061115ABH	14.2	353.2
WTS-A-FM	FM	244A	Brattleboro	VT	BLH19910821KF	5.3	331.9
WTHK	FM	264A	Wilmington	VT	BLH19991215ABK	30.4	294.2
WKKN	FM	270A	Westminster	VT	BLH20080409AAH	27.1	40.3
WEQX	FM	274B	Manchester	VT	BMLH20070625ACM	56.1	309.3
WZLF	FM	296A	Bellows Falls	VT	BMLH19920522KC	45.1	26.8
WTS-A	AM	1450	BRATTLEBORO	VT	BL8900	3.1	36.0
WCNL	AM	1010	NEWPORT	NH	BL20031103ADH	66.1	29.6
WTSV	AM	1230	CLAREMONT	NH	BL8351	61.7	19.5
WCFR	AM	1480	SPRINGFIELD	VT	BL20170131AEV	48.8	9.0

Distance and bearing calculations from coordinates: 42-50-51 N, 072-34-56 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

*** Co-owned stations entering, but not defining the market, have been excluded.**

*** Stations more than 92 km from the common area have been excluded.**

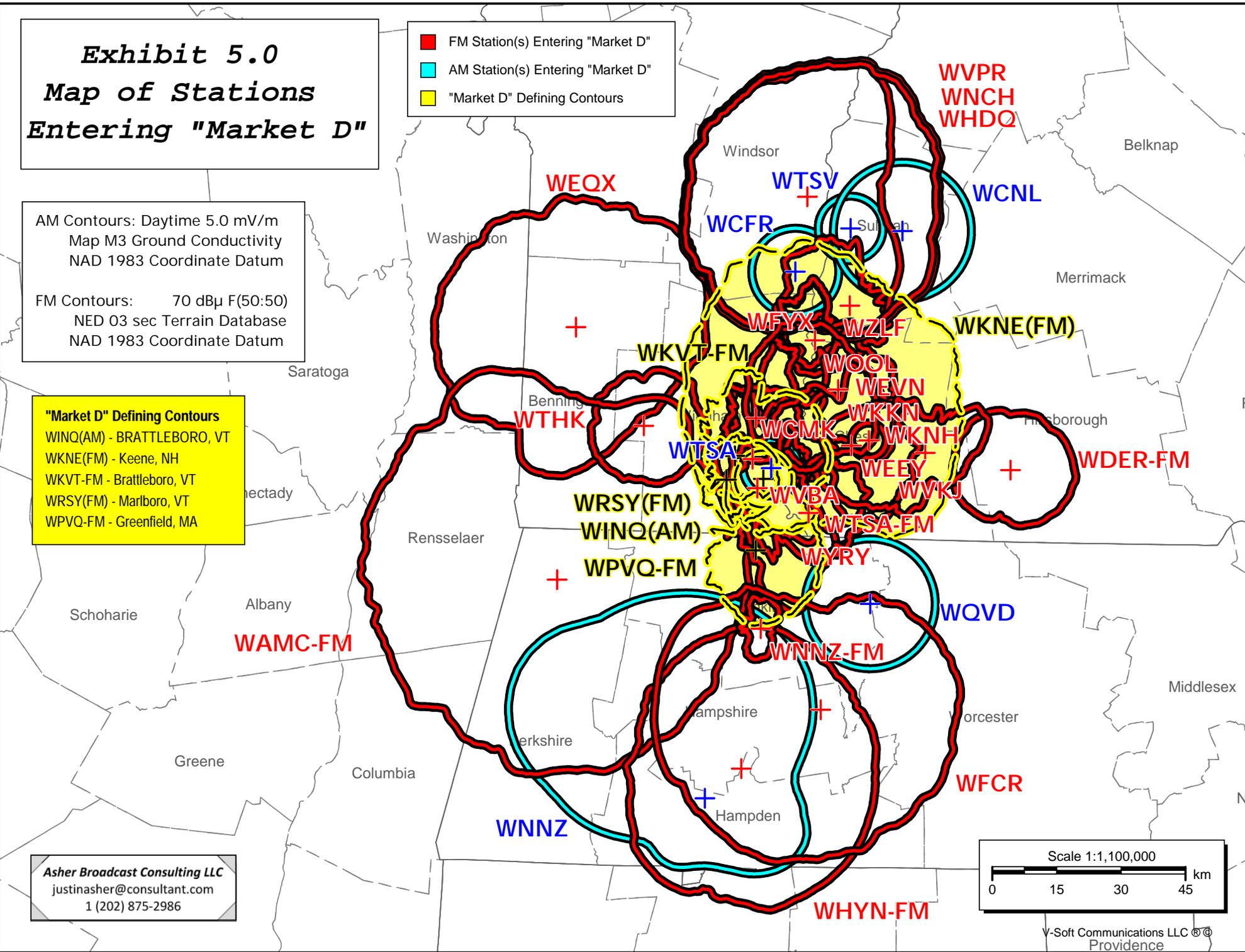
Exhibit 5.0 Map of Stations Entering "Market D"

- FM Station(s) Entering "Market D"
- AM Station(s) Entering "Market D"
- "Market D" Defining Contours

AM Contours: Daytime 5.0 mV/m
Map M3 Ground Conductivity
NAD 1983 Coordinate Datum

FM Contours: 70 dBμ F(50:50)
NED 03 sec Terrain Database
NAD 1983 Coordinate Datum

"Market D" Defining Contours
 WINQ(AM) - BRATTLEBORO, VT
 WKNE(FM) - Keene, NH
 WKVT-FM - Brattleboro, VT
 WRSY(FM) - Marlboro, VT
 WPVQ-FM - Greenfield, MA



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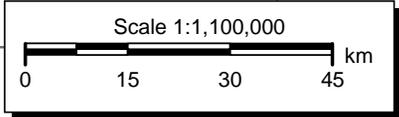


Exhibit 5.1

Tabulation of Select Stations Entering "Market D"

Total number of overlapping contours: 33

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WINQ(AM)	AM	1490	BRATTLEBORO	VT	BL10204	0.0	0.0
WKNE(FM)	FM	279B	Keene	NH	0000124902	27.1	40.3
WKVT-FM	FM	224A	Brattleboro	VT	BMLH19900627KB	8.5	309.1
WRSY(FM)	FM	268A	Marlboro	VT	BLH19960830KA	8.6	269.0
WPVQ-FM	FM	237A	Greenfield	MA	BLH20180405AAL	16.7	186.4

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WFCR	FM	203B	Amherst	MA	BLED19970605KB	55.3	166.3
WNNZ-FM	FM	219A	Deerfield	MA	BMLD20100908ACV	34.8	181.3
WHYN-FM	FM	226B	Springfield	MA	BMLH19990121KA	67.6	184.6
WVKJ	FM	210A	Dublin	NH	BLED20111207AES	38.2	81.1
WEVN	FM	214B1	Keene	NH	BMLD20030815ADI	27.1	40.3
WKNH	FM	217A	Keene	NH	BLD19960202KB	26.1	70.2
WDER-FM	FM	221A	Peterborough	NH	BLH20010828AAS	57.5	88.2
WEY	FM	228A	Swansey	NH	BLH20080912AAG	21.9	69.6
WFYX	FM	242A	Walpole	NH	BLH20131115BFI	34.4	20.7
WYRY	FM	285A	Hinsdale	NH	BLH20010402AAV	13.1	127.2
WHDQ	FM	291B	Claremont	NH	BMLH20120912AAU	66.4	9.2
WAMC-FM	FM	212B	Albany	NY	BMLD20101102ABH	53.4	244.2
WNCH	FM	201B	Norwich	VT	BMLD20120821ABW	66.4	9.2
WVBA	FM	205B1	Brattleboro	VT	BLED20180712AAL	2.5	213.9
WVPR	FM	208B	Windsor	VT	BMLD20120821ABT	66.4	9.2
WOOL	FM	218A	Bellows Falls	VT	BLED20140212ACZ	34.4	20.7
WCMK	FM	220A	Putney	VT	BMLD200611115ABH	14.2	353.2
WTSA-FM	FM	244A	Brattleboro	VT	BLH19910821KF	5.3	331.9
WTHK	FM	264A	Wilmington	VT	BLH19991215ABK	30.4	294.2
WKKN	FM	270A	Westminster	VT	BLH20080409AAH	27.1	40.3
WEQX	FM	274B	Manchester	VT	BMLH20070625ACM	56.1	309.3
WZLF	FM	296A	Bellows Falls	VT	BMLH19920522KC	45.1	26.8
WQVD	AM	700	ORANGE-ATHOL	MA	BL20190424ABL	38.2	139.7
WTSA	AM	1450	BRATTLEBORO	VT	BL8900	3.1	36.0
WNNZ	AM	640	WESTFIELD	MA	BML20100820ABW	75.5	190.7
WCNL	AM	1010	NEWPORT	NH	BL20031103ADH	66.1	29.6
WTSV	AM	1230	CLAREMONT	NH	BL8351	61.7	19.5
WCFR	AM	1480	SPRINGFIELD	VT	BL20170131AEV	48.8	9.0

Distance and bearing calculations from coordinates: 42-50-51 N, 072-34-56 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.

*** Co-owned stations entering, but not defining the market, have been excluded.**

*** Stations more than 92 km from the common area have been excluded.**

Exhibit 6.1

Tabulation of Select Stations Entering "Market E"

Total number of overlapping contours: 26

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WPVQ-FM	FM	237A Greenfield	MA	BLH20180405AAL	0.0	0.0
WKVT-FM	FM	224A Brattleboro	VT	BMLH19900627KB	22.5	347.8
WRSI(FM)	FM	230A Turners Falls	MA	0000168026	14.5	193.0

Overlapping Contours:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WFCR	FM	203B Amherst	MA	BLED19970605KB	40.1	158.0
WAMH	FM	207A Amherst	MA	BLED20121019ACF	40.1	158.0
WMUA	FM	216A Amherst	MA	BLED20031110ACU	34.5	168.6
WNNZ-FM	FM	219A Deerfield	MA	BMLH20100908ACV	18.2	176.6
WHYN-FM	FM	226B Springfield	MA	BMLH19990121KA	50.9	184.0
WKMY	FM	260A Athol	MA	0000105606	35.2	109.0
WRNX	FM	265A Amherst	MA	BLH20120110ADN	49.7	183.7
WWEI	FM	288A Easthampton	MA	BMLH20141103AER	50.9	184.1
WEIB	FM	292A Northampton	MA	BLH19980318KB	36.5	188.9
WVKJ	FM	210A Dublin	NH	BLED20111207AES	45.5	60.4
WEVN	FM	214B1 Keene	NH	BMLH20030815ADI	42.0	27.5
WEZY	FM	228A Swanzey	NH	BLH20080912AAG	33.0	42.8
WIFY	FM	242A Walpole	NH	BLH20131115BFI	50.8	16.0
WYRY	FM	285A Hinsdale	NH	BLH20010402AAV	15.1	55.0
WAMC-FM	FM	212B Albany	NY	BMLH20101102ABH	46.7	261.9
WVBA	FM	205B1 Brattleboro	VT	BLED20180712AAL	14.5	1.8
WCMK	FM	220A Putney	VT	BMLH20061115ABH	30.7	0.3
WTSA-FM	FM	244A Brattleboro	VT	BLH19910821KF	21.2	358.3
WTHK	FM	264A Wilmington	VT	BLH19991215ABK	38.9	318.3
WKKN	FM	270A Westminster	VT	BLH20080409AAH	42.0	27.5
WQVD	AM	700 ORANGE-ATHOL	MA	BL20190424ABL	29.4	115.3
WTSA	AM	1450 BRATTLEBORO	VT	BL8900	19.5	11.0
WNNZ	AM	640 WESTFIELD	MA	BML20100820ABW	58.9	191.9

Distance and bearing calculations from coordinates: 42-41-53.30 N, 072-36-18.30 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.

*** Co-owned stations entering, but not defining the market, have been excluded.**

*** Stations more than 92 km from the common area have been excluded.**

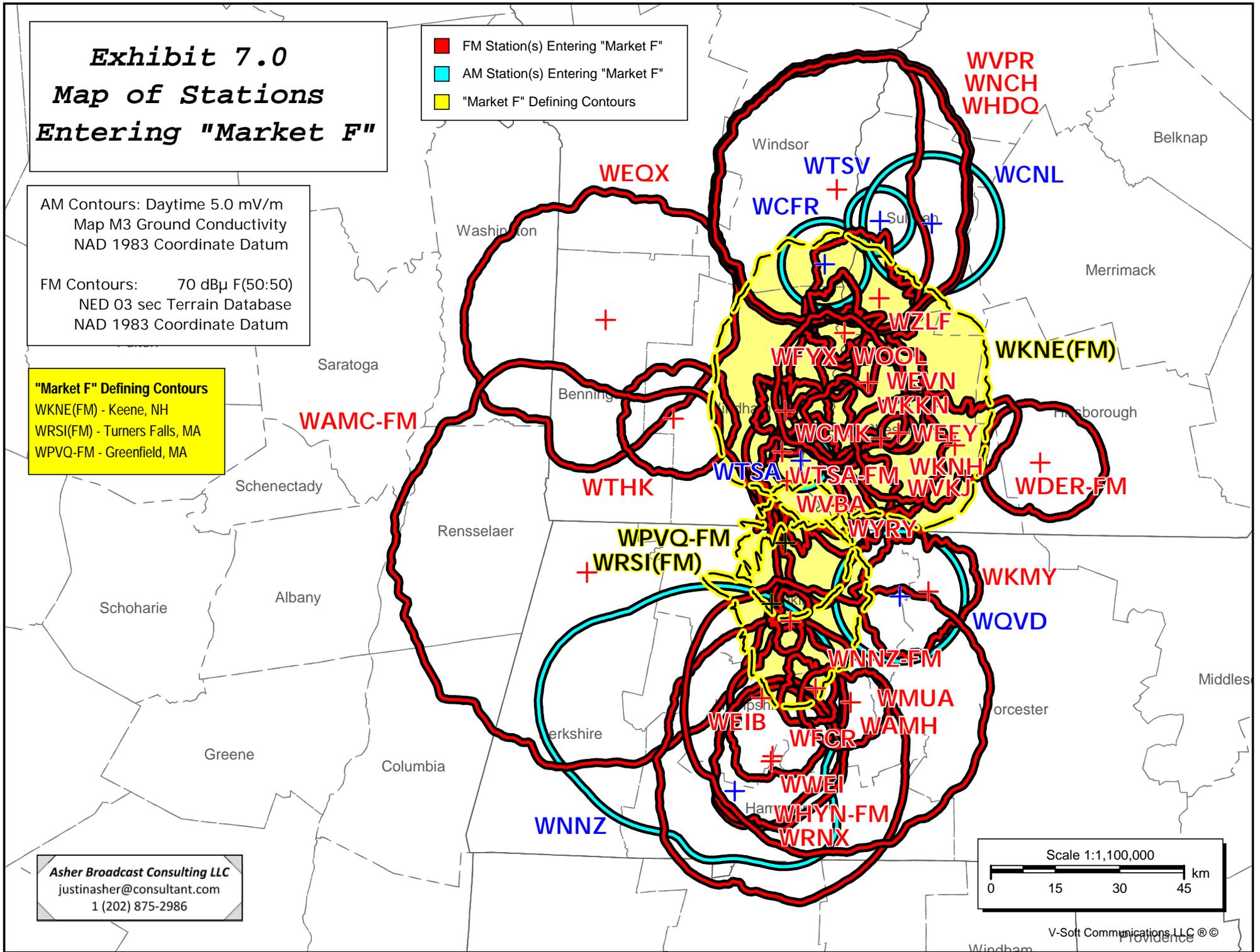
Exhibit 7.0 Map of Stations Entering "Market F"

- FM Station(s) Entering "Market F"
- AM Station(s) Entering "Market F"
- "Market F" Defining Contours

AM Contours: Daytime 5.0 mV/m
Map M3 Ground Conductivity
NAD 1983 Coordinate Datum

FM Contours: 70 dBμ F(50:50)
NED 03 sec Terrain Database
NAD 1983 Coordinate Datum

"Market F" Defining Contours
 WKNE(FM) - Keene, NH
 WRSI(FM) - Turners Falls, MA
 WPVQ-FM - Greenfield, MA



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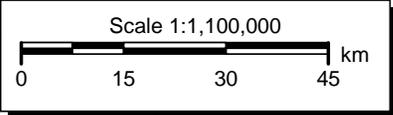


Exhibit 7.1

Tabulation of Select Stations Entering "Market F"

Total number of overlapping contours: 37

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WKNE(FM)	FM	279B	Keene	NH	0000124902	0.0	0.0
WRSI(FM)	FM	230A	Turners Falls	MA	0000168026	56.2	203.9
WPVQ-FM	FM	237A	Greenfield	MA	BLH20180405AAL	42.0	207.6

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WFCR	FM	203B	Amherst	MA	BLED19970605KB	74.5	183.5
WAMH	FM	207A	Amherst	MA	BLED20121019ACF	74.5	183.5
WMUA	FM	216A	Amherst	MA	BLED20031110ACU	72.2	190.2
WNNZ-FM	FM	219A	Deerfield	MA	BMLH20100908ACV	58.4	198.4
WHYN-FM	FM	226B	Springfield	MA	BMLH19990121KA	91.0	194.8
WKMY	FM	260A	Athol	MA	0000105606	50.7	164.3
WRNX	FM	265A	Amherst	MA	BLH20120110ADN	89.7	194.8
WWEI	FM	288A	Easthampton	MA	BMLH20141103AER	90.9	194.8
WEIB	FM	292A	Northampton	MA	BLH19980318KB	77.5	199.0
WVKJ	FM	210A	Dublin	NH	BLED20111207AES	25.0	126.4
WEVN	FM	214B1	Keene	NH	BMLH20030815ADI	0.0	323.7
WKNH	FM	217A	Keene	NH	BLED19960202KB	13.8	149.3
WDER-FM	FM	221A	Peterborough	NH	BLH20010828AAS	44.2	115.4
WEEY	FM	228A	Swansey	NH	BLH20080912AAG	13.4	167.1
WFYX	FM	242A	Walpole	NH	BLH20131115BFI	12.7	335.3
WYRY	FM	285A	Hinsdale	NH	BLH20010402AAV	29.5	194.0
WHDQ	FM	291B	Claremont	NH	BMLH20120912AAU	45.4	351.3
WAMC-FM	FM	212B	Albany	NY	BMLH20101102ABH	78.9	236.4
WNCH	FM	201B	Norwich	VT	BMLH20120821ABW	45.4	351.3
WVBA	FM	205B1	Brattleboro	VT	BLED20180712AAL	29.6	219.9
WVPR	FM	208B	Windsor	VT	BMLH20120821ABT	45.4	351.3
WOOL	FM	218A	Bellows Falls	VT	BLED20140212ACZ	12.7	335.3
WCMK	FM	220A	Putney	VT	BMLH20061115ABH	20.3	251.3
WTSA-FM	FM	244A	Brattleboro	VT	BLH19910821KF	25.6	231.4
WTHK	FM	264A	Wilmington	VT	BLH19991215ABK	46.0	259.9
WKKN	FM	270A	Westminster	VT	BLH20080409AAH	0.0	0.0
WEQX	FM	274B	Manchester	VT	BMLH20070625ACM	62.7	283.9
WZLF	FM	296A	Bellows Falls	VT	BMLH19920522KC	19.7	8.3
WQVD	AM	700	ORANGE-ATHOL	MA	BL20190424ABL	50.3	171.9
WTSA	AM	1450	BRATTLEBORO	VT	BL8900	24.0	221.0
WNNZ	AM	640	WESTFIELD	MA	BML20100820ABW	100.0	198.5
WCNL	AM	1010	NEWPORT	NH	BL20031103ADH	39.8	22.4
WTSV	AM	1230	CLAREMONT	NH	BL8351	37.6	4.8
WCFR	AM	1480	SPRINGFIELD	VT	BL20170131AEV	29.2	340.4

Distance and bearing calculations from coordinates: 43-02-00 N, 072-22-02 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.

*** Co-owned stations entering, but not defining the market, have been excluded.**

*** Stations more than 92 km from the common area have been excluded.**

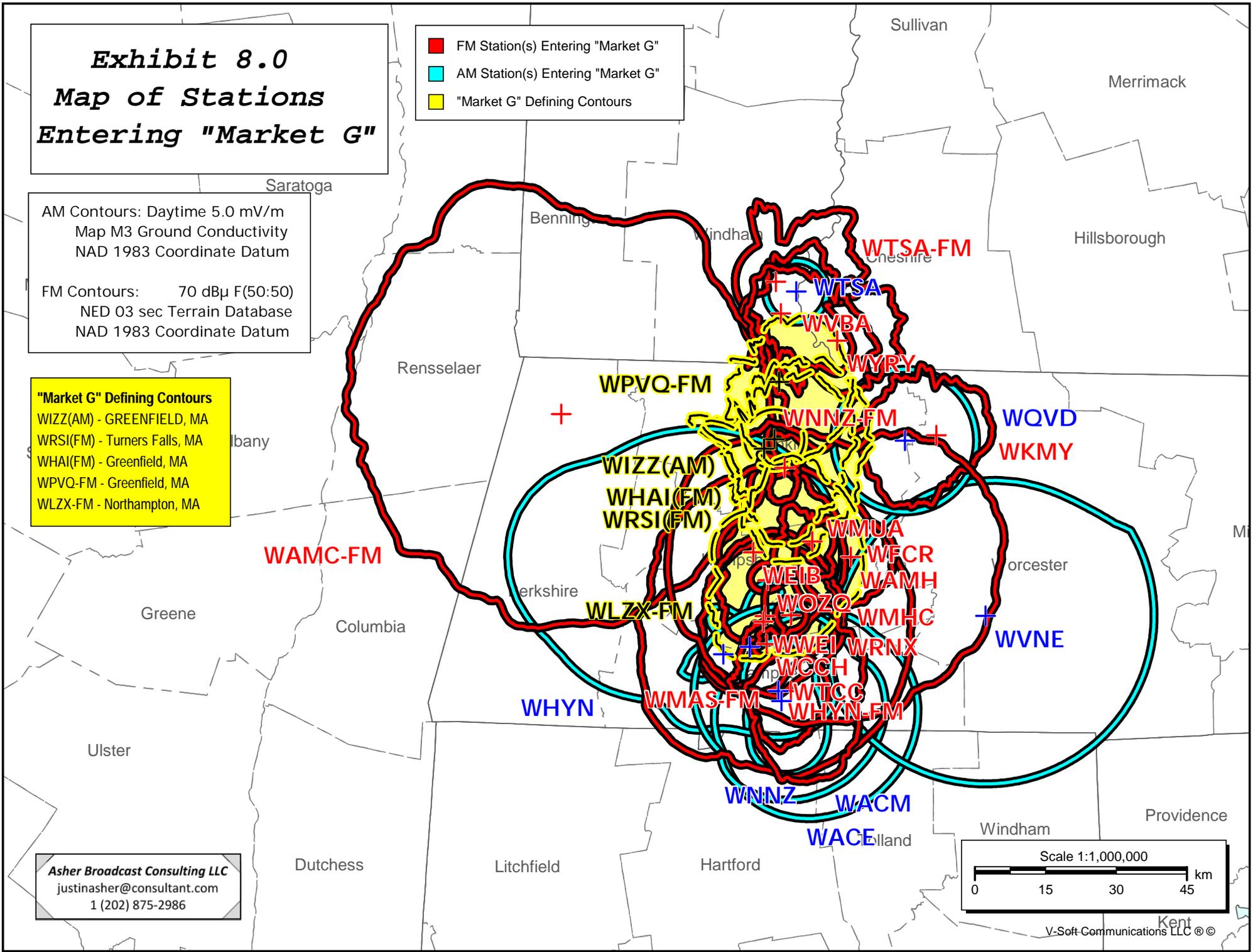
Exhibit 8.0 Map of Stations Entering "Market G"

- FM Station(s) Entering "Market G"
- AM Station(s) Entering "Market G"
- "Market G" Defining Contours

AM Contours: Daytime 5.0 mV/m
Map M3 Ground Conductivity
NAD 1983 Coordinate Datum

FM Contours: 70 dBμ F(50:50)
NED 03 sec Terrain Database
NAD 1983 Coordinate Datum

"Market G" Defining Contours
 WIZZ(AM) - GREENFIELD, MA
 WRSI(FM) - Turners Falls, MA
 WHAI(FM) - Greenfield, MA
 WPVQ-FM - Greenfield, MA
 WLZX-FM - Northampton, MA



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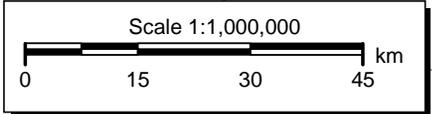


Exhibit 8.1

Tabulation of Select Stations Entering "Market G"

Total number of overlapping contours: 30

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WIZZ(AM)	AM	1520	GREENFIELD	MA	BL20230411AAD	0.0	0.0
WRSI(FM)	FM	230A	Turners Falls	MA	0000168026	3.0	227.6
WHAI(FM)	FM	252A	Greenfield	MA	0000168024	3.0	227.6
WPVQ-FM	FM	237A	Greenfield	MA	BLH20180405AAL	12.2	5.0
WLZX-FM	FM	257A	Northampton	MA	BLH20000112ABC	24.3	190.8

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WMAS-FM	FM	234B	Enfield	CT	0000187550	53.3	179.3
WFCR	FM	203B	Amherst	MA	BLED19970605KB	29.7	147.2
WAMH	FM	207A	Amherst	MA	BLED20121019ACF	29.7	147.2
WTCC	FM	214A	Springfield	MA	BMLD20070314ADO	53.4	176.5
WMUA	FM	216A	Amherst	MA	BLED20031110ACU	23.1	160.0
WMHC	FM	218A	South Hadley	MA	BMLD19880804LI	37.4	174.8
WNNZ-FM	FM	219A	Deerfield	MA	BMLD20100908ACV	6.4	160.4
WOZQ	FM	220A	Northampton	MA	BLED19820924AH	29.9	183.0
WHYN-FM	FM	226B	Springfield	MA	BMLH19990121KA	38.7	183.7
WKMY	FM	260A	Athol	MA	0000105606	34.3	88.9
WRNX	FM	265A	Amherst	MA	BLH20120110ADN	37.5	183.3
WCCH	FM	278D	Holyoke	MA	BLED19811130AS	43.4	182.4
WWEI	FM	288A	Easthampton	MA	BMLH20141103AER	38.7	183.7
WEIB	FM	292A	Northampton	MA	BLH19980318KB	24.3	190.8
WYRY	FM	285A	Hinsdale	NH	BLH20010402AAV	24.7	32.8
WAMC-FM	FM	212B	Albany	NY	BMLD20101102ABH	45.5	277.0
WVBA	FM	205B1	Brattleboro	VT	BLED20180712AAL	26.7	3.2
WTSA-FM	FM	244A	Brattleboro	VT	BLH19910821KF	33.4	0.8
WQVD	AM	700	ORANGE-ATHOL	MA	BL20190424ABL	27.7	90.8
WVNE	AM	760	LEICESTER	MA	BL19940412AB	58.3	130.2
WTSA	AM	1450	BRATTLEBORO	VT	BL8900	31.6	8.7
WACE	AM	730	CHICOPEE	MA	BL20230110AAB	53.3	179.4
WHYN	AM	560	SPRINGFIELD	MA	BML20080521AEH	44.2	187.1
WNNZ	AM	640	WESTFIELD	MA	BML20100820ABW	46.8	193.6
WACM	AM	1270	SPRINGFIELD	MA	BL8346	55.4	178.7

Distance and bearing calculations from coordinates: 42-35-20 N, 072-37-05 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.

*** Co-owned stations entering, but not defining the market, have been excluded.**

*** Stations more than 92 km from the common area have been excluded.**

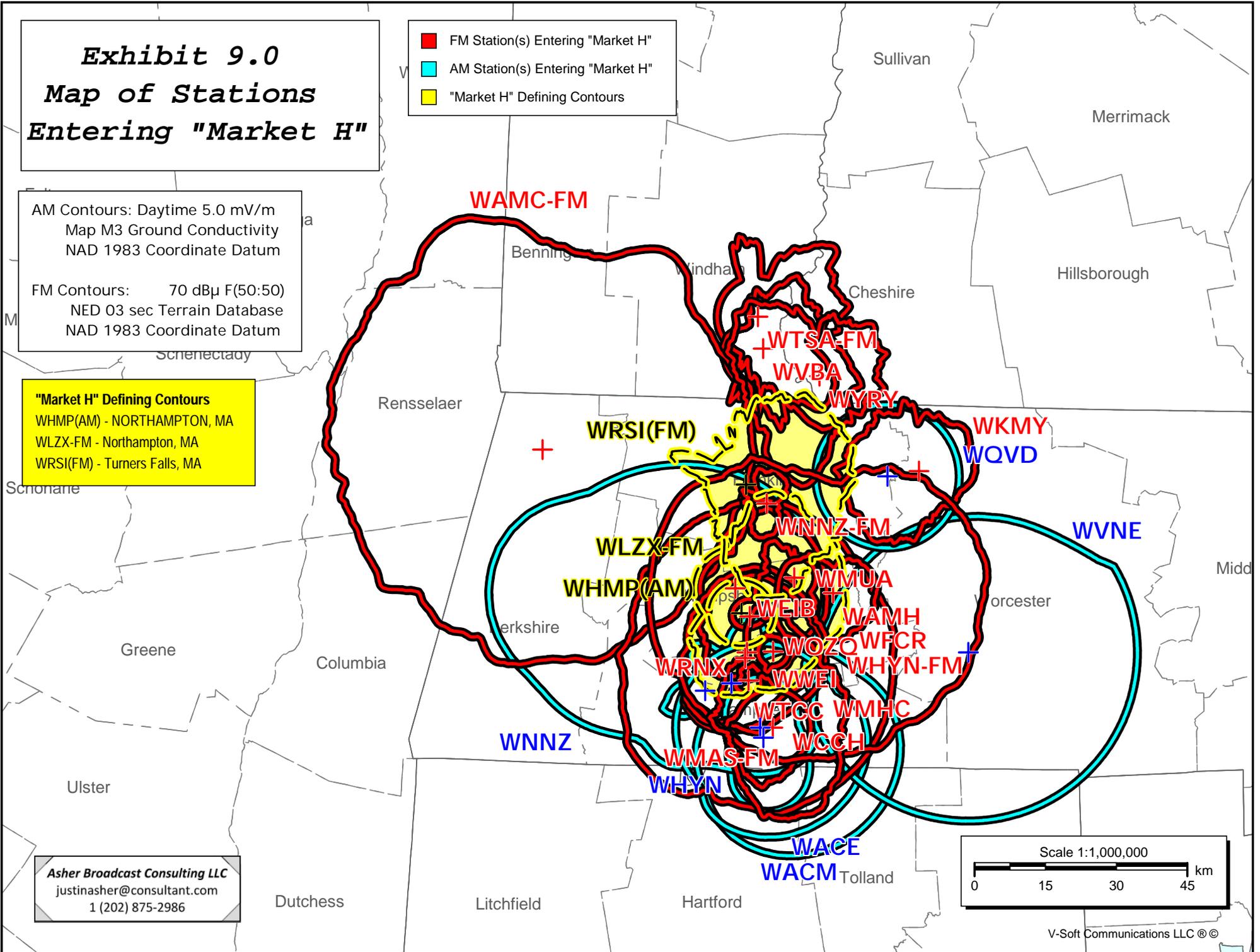
Exhibit 9.0 Map of Stations Entering "Market H"

- FM Station(s) Entering "Market H"
- AM Station(s) Entering "Market H"
- "Market H" Defining Contours

AM Contours: Daytime 5.0 mV/m
Map M3 Ground Conductivity
NAD 1983 Coordinate Datum

FM Contours: 70 dBμ F(50:50)
NED 03 sec Terrain Database
NAD 1983 Coordinate Datum

"Market H" Defining Contours
WHMP(AM) - NORTHAMPTON, MA
WLZX-FM - Northampton, MA
WRSI(FM) - Turners Falls, MA



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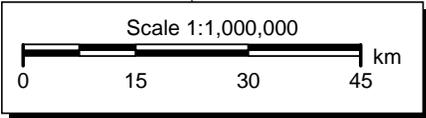


Exhibit 9.1

Tabulation of Select Stations Entering "Market H"

Total number of overlapping contours: 27

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WHMP(AM)	AM	1400 NORTHAMPTON	MA	BL8673	0.0	0.0
WLZX-FM	FM	257A Northampton	MA	BLH20000112ABC	5.4	346.1
WRSI(FM)	FM	230A Turners Falls	MA	0000168026	27.1	2.3

Overlapping Contours:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WMAS-FM	FM	234B Enfield	CT	0000187550	24.5	170.8
WFCR	FM	203B Amherst	MA	BLED19970605KB	19.8	77.9
WAMH	FM	207A Amherst	MA	BLED20121019ACF	19.8	77.9
WTCC	FM	214A Springfield	MA	BMLD20070314ADO	25.0	164.9
WMUA	FM	216A Amherst	MA	BLED20031110ACU	13.4	56.3
WMHC	FM	218A South Hadley	MA	BMLD19880804LI	10.5	140.8
WNNZ-FM	FM	219A Deerfield	MA	BMLD20100908ACV	23.7	13.2
WOZQ	FM	220A Northampton	MA	BLED19820924AH	1.9	112.0
WHYN-FM	FM	226B Springfield	MA	BMLH19990121KA	9.5	175.3
WKMY	FM	260A Athol	MA	0000105606	48.0	51.6
WRNX	FM	265A Amherst	MA	BLH20120110ADN	8.4	172.3
WCCH	FM	278D Holyoke	MA	BLED19811130AS	14.3	174.2
WWEI	FM	288A Easthampton	MA	BMLH20141103AER	9.5	175.5
WEIB	FM	292A Northampton	MA	BLH19980318KB	5.4	346.1
WYRY	FM	285A Hinsdale	NH	BLH20010402AAV	52.6	18.5
WAMC-FM	FM	212B Albany	NY	BMLD20101102ABH	54.3	309.6
WVBA	FM	205B1 Brattleboro	VT	BLED20180712AAL	55.9	4.9
WTSA-FM	FM	244A Brattleboro	VT	BLH19910821KF	62.6	3.4
WQVD	AM	700 ORANGE-ATHOL	MA	BL20190424ABL	42.2	47.1
WVNE	AM	760 LEICESTER	MA	BL19940412AB	48.6	100.0
WACE	AM	730 CHICOPEE	MA	BL20230110AAB	24.5	170.9
WHYN	AM	560 SPRINGFIELD	MA	BML20080521AEH	14.9	188.3
WNNZ	AM	640 WESTFIELD	MA	BML20100820ABW	18.1	205.3
WACM	AM	1270 SPRINGFIELD	MA	BL8346	26.7	170.2

Distance and bearing calculations from coordinates: 42-19-36 N, 072-39-28 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.

*** Co-owned stations entering, but not defining the market, have been excluded.**

*** Stations more than 92 km from the common area have been excluded.**

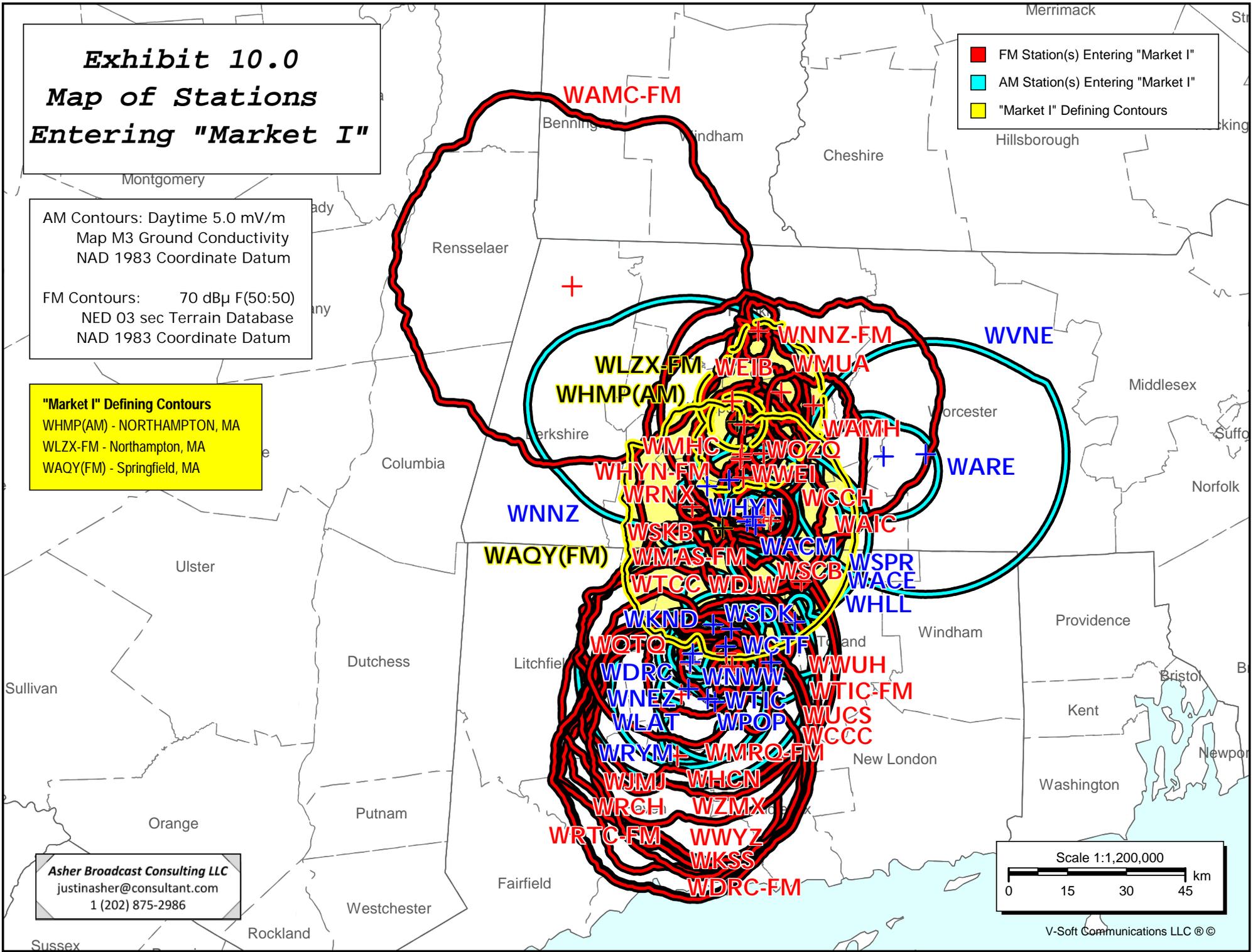
Exhibit 10.0 Map of Stations Entering "Market I"

AM Contours: Daytime 5.0 mV/m
Map M3 Ground Conductivity
NAD 1983 Coordinate Datum

FM Contours: 70 dBμ F(50:50)
NED 03 sec Terrain Database
NAD 1983 Coordinate Datum

"Market I" Defining Contours
 WHMP(AM) - NORTHAMPTON, MA
 WLZX-FM - Northampton, MA
 WAQY(FM) - Springfield, MA

- FM Station(s) Entering "Market I"
- AM Station(s) Entering "Market I"
- "Market I" Defining Contours



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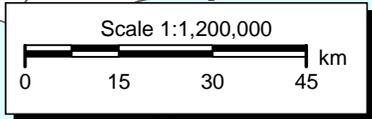


Exhibit 10.1

Tabulation of Select Stations Entering "Market I"

Total number of overlapping contours: 53

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WHMP (AM)	AM	1400	NORTHAMPTON	MA	BL8673	0.0	0.0
WLZX-FM	FM	257A	Northampton	MA	BLH20000112ABC	5.4	346.1
WAQY (FM)	FM	271B	Springfield	MA	BMLH19930514KA	27.3	188.1

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WJMJ	FM	205B	Hartford	CT	BLED20180911ADG	70.7	191.8
WRTC-FM	FM	207A	Hartford	CT	BMLD20020201AAV	63.9	182.5
WDJW	FM	209D	Somers	CT	BLED19790726AE	43.6	158.3
WQTQ	FM	210A	Hartford	CT	BLED20020305AAS	59.0	183.0
WUWH	FM	217A	West Hartford	CT	BLED19970107KB	62.6	191.3
WWYZ	FM	223B	Waterbury	CT	BLH19940916KD	86.2	190.4
WZMX	FM	229B	Hartford	CT	BMLH20080306AAR	86.3	190.4
WMAS-FM	FM	234B	Enfield	CT	0000187550	24.5	170.8
WKSS	FM	239B	Hartford-Meriden	CT	BMLH19980820KA	86.4	190.3
WTIC-FM	FM	243B	Hartford	CT	BMLH20131029ABW	62.6	191.3
WUCS	FM	250A	Windsor Locks	CT	BLH20120123AEO	62.2	181.5
WRCH	FM	263B	New Britain	CT	BMLH20090430AAN	70.7	191.8
WDRC-FM	FM	275B	Hartford	CT	BLH20140929AGJ	86.3	190.4
WMRQ-FM	FM	281B	Waterbury	CT	BLH20120622ABZ	86.4	190.4
WHCN	FM	290B	Hartford	CT	BLH19890323KA	86.2	190.4
WCCC	FM	295B	Hartford	CT	BMLD20140930ACT	60.0	191.2
WFCR	FM	203B	Amherst	MA	BLED19970605KB	19.8	77.9
WAMH	FM	207A	Amherst	MA	BLED20121019ACF	19.8	77.9
WSKB	FM	208A	Westfield	MA	BLED19830222AT	24.5	208.0
WSCB	FM	210A	Springfield	MA	BLED19821117AC	26.5	161.8
WTCC	FM	214A	Springfield	MA	BMLD20070314ADO	25.0	164.9
WMUA	FM	216A	Amherst	MA	BLED20031110ACU	13.4	56.3
WMHC	FM	218A	South Hadley	MA	BMLD19880804LI	10.5	140.8
WNNZ-FM	FM	219A	Deerfield	MA	BMLD20100908ACV	23.7	13.2
WAIC	FM	220A	Springfield	MA	BLED20170710ACD	25.2	160.5
WOZQ	FM	220A	Northampton	MA	BLED19820924AH	1.9	112.0
WHYN-FM	FM	226B	Springfield	MA	BMLH19990121KA	9.5	175.3
WRNX	FM	265A	Amherst	MA	BLH20120110ADN	8.4	172.3
WCCH	FM	278D	Holyoke	MA	BLED19811130AS	14.3	174.2
WWEI	FM	288A	Easthampton	MA	BMLH20141103AER	9.5	175.5
WEIB	FM	292A	Northampton	MA	BLH19980318KB	5.4	346.1
WAMC-FM	FM	212B	Albany	NY	BMLD20101102ABH	54.3	309.6
WCTF	AM	1170	VERNON	CT	BML20000519AEC	52.9	164.2
WKND	AM	1480	WINDSOR	CT	BL8458	52.7	181.9
WSDK	AM	1550	BLOOMFIELD	CT	BL19860904AA	51.9	187.0
WLAT	AM	910	NEW BRITAIN	CT	BMML20150928AGK	69.0	190.6
WRYM	AM	840	NEW BRITAIN	CT	BL19980319KA	71.4	184.8
WTIC	AM	1080	HARTFORD	CT	BMML20101117BHX	62.2	191.4
WDRC	AM	1360	HARTFORD	CT	BL20120420ACS	57.1	183.2
WPOP	AM	1410	HARTFORD	CT	BMML20200414AAU	70.8	186.4
WNWW	AM	1290	WEST HARTFORD	CT	BML20141002ABP	60.0	191.1
WNEZ	AM	1230	MANCHESTER	CT	BL20010713ABS	61.7	172.2
WVNE	AM	760	LEICESTER	MA	BL19940412AB	48.6	100.0
WSPR	AM	1490	WEST SPRINGFIELD	MA	BL19900207AB	25.4	174.7
WACE	AM	730	CHICOPEE	MA	BL20230110AAB	24.5	170.9
WHYN	AM	560	SPRINGFIELD	MA	BML20080521AEH	14.9	188.3
WARE	AM	1250	WARE	MA	BML20021025ABR	38.2	103.5
WNNZ	AM	640	WESTFIELD	MA	BML20100820ABW	18.1	205.3
WACM	AM	1270	SPRINGFIELD	MA	BL8346	26.7	170.2
WHLL	AM	1450	SPRINGFIELD	MA	BL20200124AAU	24.5	170.9

Distance and bearing calculations from coordinates: 42-19-36 N, 072-39-28 W

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.

*** Co-owned stations entering, but not defining the market, have been excluded.**

*** Stations more than 92 km from the common area have been excluded.**

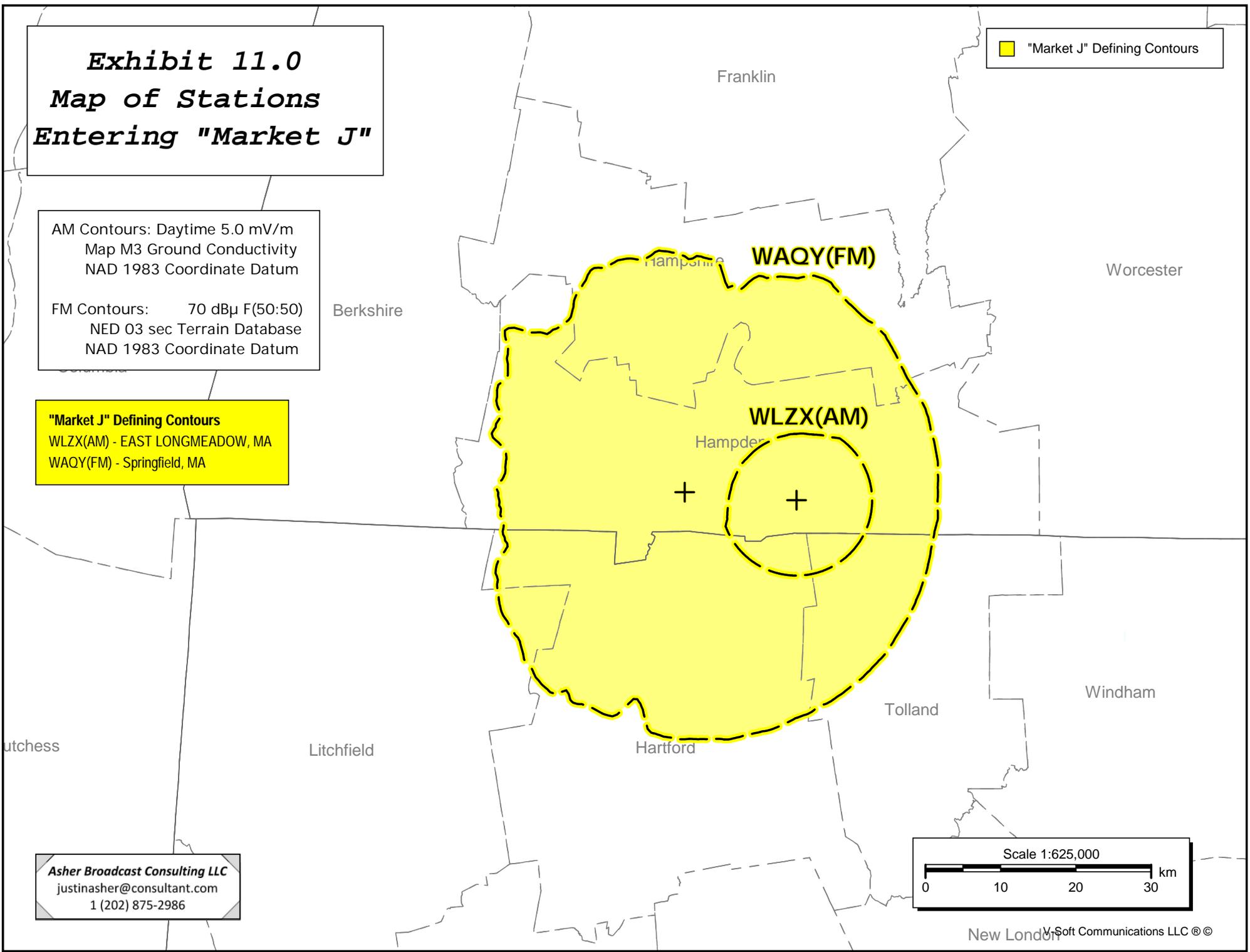
Exhibit 11.0 Map of Stations Entering "Market J"

AM Contours: Daytime 5.0 mV/m
Map M3 Ground Conductivity
NAD 1983 Coordinate Datum

FM Contours: 70 dBμ F(50:50)
NED 03 sec Terrain Database
NAD 1983 Coordinate Datum

"Market J" Defining Contours
WLZX(AM) - EAST LONGMEADOW, MA
WAQY(FM) - Springfield, MA

 "Market J" Defining Contours



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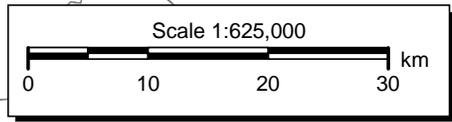


Exhibit 11.1

Tabulation of Select Stations Entering “Market J”

Total number of overlapping contours: 2

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WLZX(AM)	AM	1600 EAST LONGMEADOW	MA	BML20170131AEU	0.0	0.0
WAQY(FM)	FM	271B Springfield	MA	BMLH19930514KA	14.9	274.3

Distance and bearing calculations from coordinates: 42-04-25 N, 072-31-29 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.

***Under the latter provisions as set forth in §73.3555(a)(1)(iv): ...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 radio stations in such market unless the combination of stations comprises not more than one AM and one FM station. As the above ownership one (1) AM and one (1) FM station falls under the latter provision of §73.3555(a)(1)(iv), the market is categorically permitted.**