

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

for

select stations within the
Saga South Communications, LLC
Hilton Head, SC & Charleston, SC Regions
“Interim Method Market A & BIA Market - Charleston, SC (76)”

WLHH(FM) - RIDGELAND, SC (Facility ID: 40705)
WOEZ(FM) - BURTON, SC (Facility ID: 25206)
WVSC(FM) - PORT ROYAL, SC (Facility ID: 49910)
WSPO(AM) - CHARLESTON, SC (Facility ID: 60038)
WAVF(FM) - HANAHAN, SC (Facility ID: 24776)
WCKN(FM) - MONCKS CORNER, SC (Facility ID: 11651)
WMXZ(FM) - ISLE OF PALMS, SC (Facility ID: 6634)
WXST(FM) - HOLLYWOOD, SC (Facility ID: 3969)

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 South Communications, LLC stations. These select stations address the general areas of Hilton Head, SC and Charleston, SC. Due to Saga South Communications, LLC owning interests in multiple markets extending from South Carolina to central Florida, individual interim method market and BIA Market counts have been prepared for the various regions. Within the South Carolina regions, this common report has been prepared regarding the below eight (8) Saga South Communications, LLC facilities. Ownership studies for other Saga South Communications, LLC stations, and other holdings associated with parent company Saga Communications, Inc., have been prepared separately. This Interim Contour-Overlap Methodology Study has been prepared to address the unrated market portions for each filing. Compliance within the BIA Market - Charleston, SC (76) has been addressed herein, but also included in a separate showing.

Saga South Communications, LLC, presently holds a broadcast interest in these select eight (8) total aural services relevant to these Transfer/Assignment filings. Co-owned holdings not overlapping these stations need not be discussed herein. Concerning these relevant holdings, there will be one (1) unique and distinct interim method market within this affected ownership group and one (1) BIA market within this affected ownership group. "Market A" is comprised of three (3) stations. Five (5) stations will also be held within the BIA Market - Charleston, SC (76). 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>
WLHH (FM)	285C3	Ridgeland	SC	BLH20171130AAE
WOEZ (FM)	229C3	Burton	SC	BLH20171116AAV
WVSC (FM)	276C3	Port Royal	SC	BLH20180320ABP

BIA Market - Charleston, SC (76)

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WSPO (AM)	1390	CHARLESTON	SC	BL19981217AG
WAVF (FM)	269C1	Hanahan	SC	BLH20081003AEA
WCKN (FM)	223C1	Moncks Corner	SC	BMLH20081014AAU
WMXZ (FM)	240C2	Isle Of Palms	SC	BLH20090617ACL
WXST (FM)	259C1	Hollywood	SC	BMLH20081014AAT

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 one (1) unique and distinct interim method market within this affected ownership group and one (1) BIA market within this affected ownership group. The interim market has 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 eight (8) stations, under common control and relevant for these ownership groupings, have been noted in **Exhibit 1.0**. As stated before, no other Saga South Communications, 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” common overlap area has been designated as well.

“Market A”				
CALL SIGN	CH/FREQ	CITY	STATE	FILE NUMBER
WLHH (FM)	285C3	Ridgeland	SC	BLH20171130AAE
WOEZ (FM)	229C3	Burton	SC	BLH20171116AAV
WVSC (FM)	276C3	Port Royal	SC	BLH20180320ABP

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)(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 2.0**. Including the three (3) FM station(s) which define the market, there are thirty-one (31) aural services in this market. **Exhibit 2.1** lists the facilities of the individual stations used in this report.

BIA Market - Charleston, SC (76)

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WSPO (AM)	1390	CHARLESTON	SC	BL19981217AG
WAVF (FM)	269C1	Hanahan	SC	BLH20081003AEA
WCKN (FM)	223C1	Moncks Corner	SC	BMLH20081014AAU
WMXZ (FM)	240C2	Isle Of Palms	SC	BLH20090617ACL
WXST (FM)	259C1	Hollywood	SC	BMLH20081014AAT

A separate BIA Market - Charleston, SC (76) count has been provided independent from this report. Under the current rules, the BIA Market - Charleston, SC (76) 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.* Including the one (1) AM and four (4) FM station(s) which are co-owned, there are thirty-four (34) aural services in the BIA Market - Charleston, SC (76). As stated before, a separate BIA Market - Charleston, SC (76) count has been provided independent from this report

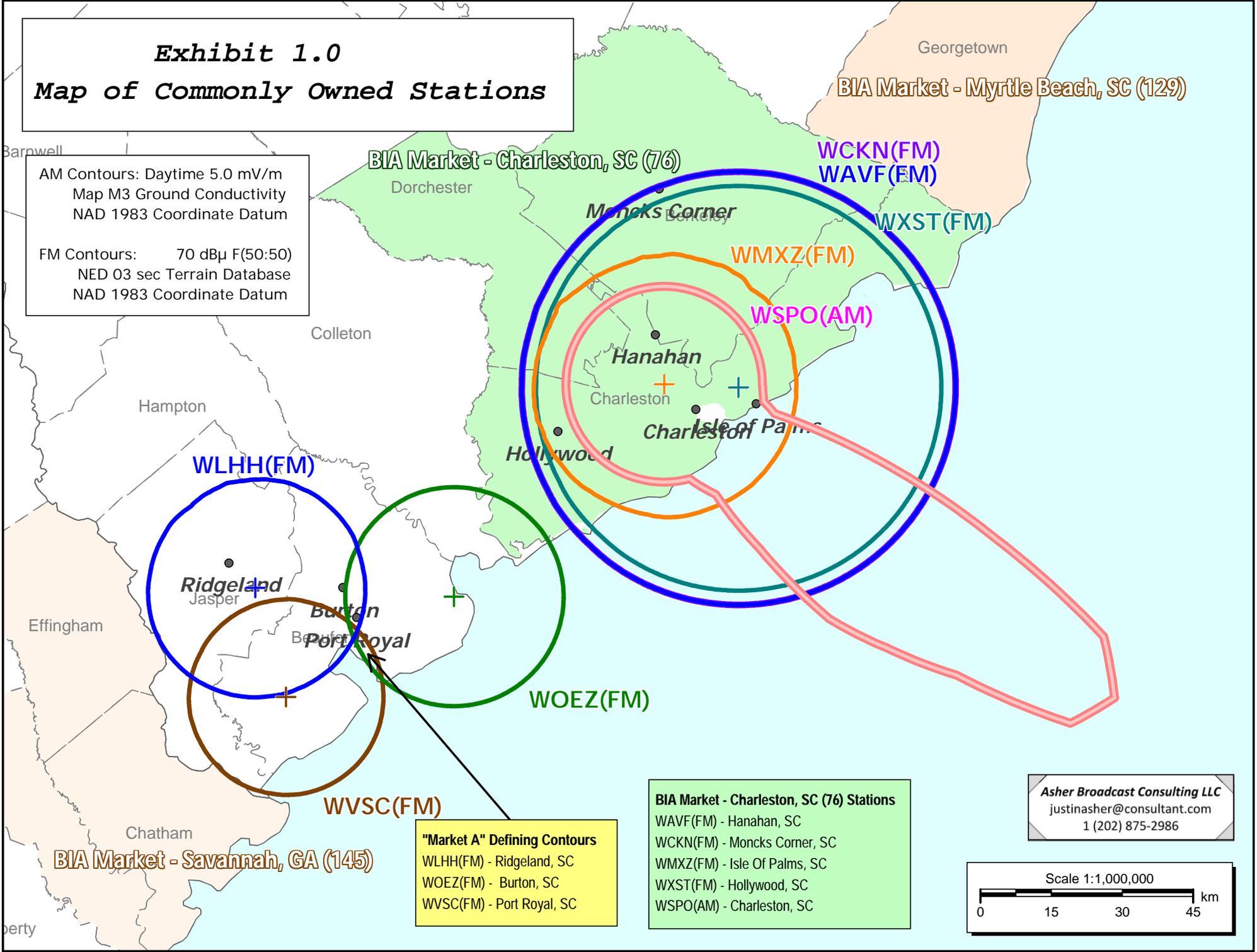
CERTIFICATION OF TECHNICAL CONSULTANT: *I declare, under penalty of perjury, that the contents of this report are true and accurate to the best of my knowledge and belief. I further certify I have over twenty-four years of experience as a broadcast technical consultant before the Federal Communications 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 8, 2023

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



BIA Market - Myrtle Beach, SC (129)

BIA Market - Charleston, SC (76)

WCKN(FM)
 WAVF(FM)

WXST(FM)

WMXZ(FM)

WSPPO(AM)

WLHH(FM)

WOEZ(FM)

WVSC(FM)

BIA Market - Savannah, GA (145)

"Market A" Defining Contours
 WLHH(FM) - Ridgeland, SC
 WWOEZ(FM) - Burton, SC
 WVSC(FM) - Port Royal, SC

BIA Market - Charleston, SC (76) Stations
 WAVF(FM) - Hanahan, SC
 WCKN(FM) - Moncks Corner, SC
 WMXZ(FM) - Isle Of Palms, SC
 WXST(FM) - Hollywood, SC
 WSPPO(AM) - Charleston, SC

Asher Broadcast Consulting LLC
 justinasher@consultant.com
 1 (202) 875-2986

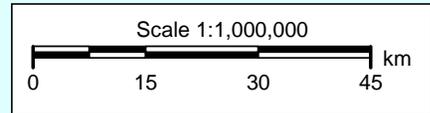


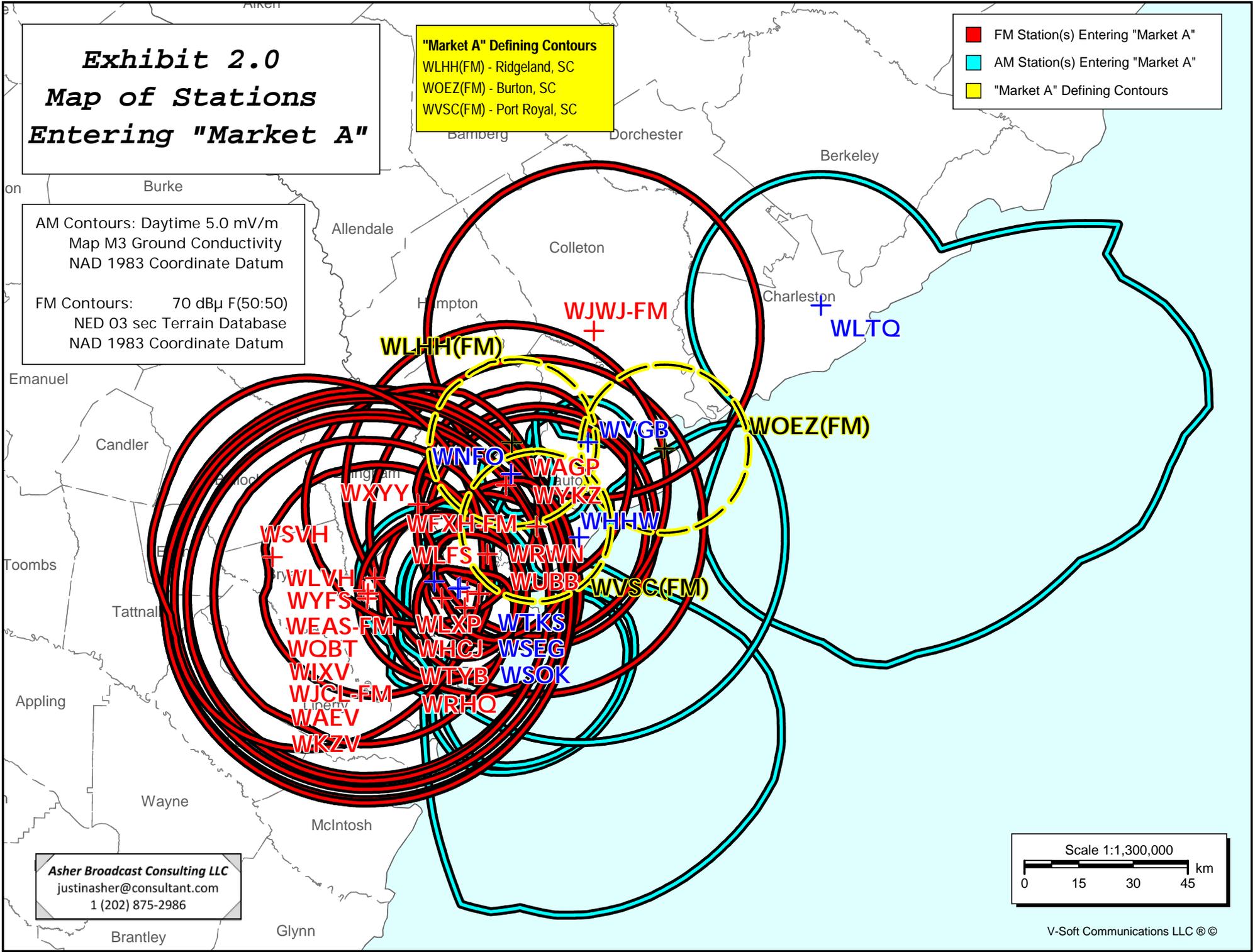
Exhibit 2.0 Map of Stations Entering "Market A"

"Market A" Defining Contours
 WLHH(FM) - Ridgeland, SC
 WOEZ(FM) - Burton, SC
 WVSC(FM) - Port Royal, SC

- FM Station(s) Entering "Market A"
- AM Station(s) Entering "Market A"
- "Market A" 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



Asher Broadcast Consulting LLC
 justinasher@consultant.com
 1 (202) 875-2986

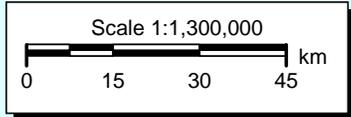


Exhibit 2.1

Tabulation of Select Stations Entering "Market A"

Total number of overlapping contours: 31

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WLHH(FM)	FM	285C3	Ridgeland	SC	BLH20171130AAE	0.0	0.0
WOEZ(FM)	FM	229C3	Burton	SC	BLH20171116AAV	42.0	92.1
WVSC(FM)	FM	276C3	Port Royal	SC	BLH20180320ABP	23.9	163.9

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WLXP	FM	201A	Savannah	GA	BLED20051109ACD	42.8	196.4
WYFS	FM	208C1	Savannah	GA	BLED20171206AAX	57.6	224.9
WHCJ	FM	212A	Savannah	GA	BLED19980616KC	47.2	195.7
WSVH	FM	216C0	Savannah	GA	BLED20080909ABI	73.0	244.3
WLFS	FM	220C3	Port Wentworth	GA	BMLD20150612AAU	31.4	192.2
WEAS-FM	FM	226C1	Springfield	GA	BLH20051201CGX	58.5	222.7
WQBT	FM	231C0	Savannah	GA	BMLH20170223AAE	58.5	222.7
WIXV	FM	238C1	Savannah	GA	BLH20030514ADV	57.3	223.4
WJCL-FM	FM	243C	Savannah	GA	BMLH201110307ACU	57.3	223.4
WAEV	FM	247C0	Savannah	GA	BMLH20170223AAF	58.5	222.7
WXYY	FM	261C2	Rincon	GA	BLH20060419AAG	30.9	236.5
WKZV	FM	271C0	Tybee Island	GA	BMLD20190214AAT	57.3	223.4
WRHQ	FM	287C3	Richmond Hill	GA	BLH19930325KA	46.9	204.1
WAGP	FM	204C1	Beaufort	SC	BLED20160317ABU	8.5	179.2
WJWJ-FM	FM	210C1	Beaufort	SC	BLED20060221AER	38.1	36.1
WYKZ	FM	254C1	Beaufort	SC	BLH19990201KB	11.8	187.8
WLVH	FM	266C2	Hardeeville	SC	BLH20140121MLF	53.0	225.2
WTYB	FM	280C2	Bluffton	SC	BLH20110830ABP	42.5	192.1
WFXH-FM	FM	291C2	Hilton Head Island	SC	BLH19961227KA	24.0	163.3
WUBB	FM	295C1	Bluffton	SC	BLH19961227KE	24.0	163.3
WRWN	FM	300C2	Port Royal	SC	BMLH20030218AAP	24.0	163.3
WHHW	AM	1130	HILTON HEAD ISLAND	SC	BL19851015AJ	31.9	144.4
WNFO	AM	1430	SUN CITY-HILTON HEAD	SC	BL19980626AA	8.6	181.3
WLTQ	AM	730	CHARLESTON	SC	BML20110427ABQ	92.9	65.9
WVGB	AM	1490	BEAUFORT	SC	BL19930114AD	20.9	89.6
WSEG	AM	1400	SAVANNAH	GA	BL19970314AG	42.3	199.6
WTKS	AM	1290	SAVANNAH	GA	BMML20160509EY	43.8	209.1
WSOK	AM	1230	SAVANNAH	GA	BL9303	42.7	200.1

Distance and bearing calculations from coordinates: 32-26-03.70 N, 080-55-15.40 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.**