

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

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Franklin Communications, Inc.  
“Interim Method Market A & Columbus, OH - BIA Market #36”

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*WBCO(AM) - BUCYRUS, OH (Facility ID: 7111)*  
*WLWQ(FM) - Columbus, OH (Facility ID: 11277)*  
*WNND(FM) - Pickerington, OH (Facility ID: 60590)*  
*WNNP(FM) - Richwood, OH (Facility ID: 30563)*  
*WQEL(FM) - Bucyrus, OH (Facility ID: 7112)*  
*WSNY(FM) - Columbus, OH (Facility ID: 22339)*  
*WVMX(FM) - Westerville, OH (Facility ID: 54556)*

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**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 Franklin Communications, Inc. stations. These stations comprise the entirety of the Franklin Communications, Inc. holdings. Ownership studies for other parent company Saga Communications, Inc. holdings have been prepared separately. These Interim Contour-Overlap Methodology Studies have been prepared to address the unrated market portion for each filing. Compliance within the Columbus, OH - BIA Market #36 has been addressed herein, but also included in a separate showing.

Franklin Communications, Inc., presently holds a broadcast interest in seven (7) 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 two (2) stations. Five (5) stations will also be held within the Columbus, OH - BIA Market #36. 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>
WBCO (AM)	1540	BUCYRUS	OH	BL20071004ADY
WQEL (FM)	224A	Bucyrus	OH	BLH20060303AAO

**Columbus, OH - BIA Market #36**

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WLVQ (FM)	242B	Columbus	OH	BLH19830404AN
WNND (FM)	278A	Pickerington	OH	BLH20061122ADG
WNNP (FM)	282A	Richwood	OH	BLH19960206KC
WSNY (FM)	234B	Columbus	OH	BLH19850605KO
WVMX (FM)	300A	Westerville	OH	BLH20090511ASY

**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 seven (7) stations, under common control and relevant for these ownership groupings, have been noted in **Exhibit 1.0**. As stated before, no other Franklin Communications, Inc. 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.

<b>“Market A”</b>				
<b>CALL SIGN</b>	<b>CH/FREQ</b>	<b>CITY</b>	<b>STATE</b>	<b>FILE NUMBER</b>
WBCO (AM)	1540	BUCYRUS	OH	BL20071004ADY
WQEL (FM)	224A	Bucyrus	OH	BLH20060303AAO

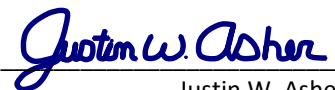
For “Market A”, the market defining contours have been shown in **Exhibit 2.0**. The defining contours have been shown with yellow lines on this map. Under the latter provisions as set forth in §73.3555(a)(1)(iv): *...no person or single entity (or entities under common control) may have a cognizable 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 2.1** lists the facilities of the individual stations used in this report.

**Columbus, OH - BIA Market #36**

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WLVQ (FM)	242B	Columbus	OH	BLH19830404AN
WNND (FM)	278A	Pickerington	OH	BLH20061122ADG
WNNP (FM)	282A	Richwood	OH	BLH19960206KC
WSNY (FM)	234B	Columbus	OH	BLH19850605KO
WVMX (FM)	300A	Westerville	OH	BLH20090511ASY

A separate Columbus, OH - BIA Market #36 count has been provided independent from this report. Under the current rules, the Columbus, OH - BIA Market #36 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.* Including the five (5) FM station(s) which are co-owned, there are forty-seven (47) aural services in the Columbus, OH - BIA Market #36. As stated before, a separate Columbus, OH - BIA Market #36 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 3, 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

Lima-Van Wert, OH - BIA Market (177)

Dayton, OH - BIA Market (63)

WNNP(FM)

WLVQ(FM)  
WSNY(FM)

WBCO(AM)

WOEL(FM)

## "Market A" Defining Contours

WBCO(AM) - Bucyrus, OH  
WOEL(FM) - Bucyrus, OH

## Columbus, OH - BIA Market #36

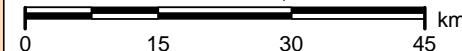
WLVQ(FM) - Columbus, OH  
WNNP(FM) - Pickerington, OH  
WNNP(FM) - Richwood, OH  
WSNY(FM) - Columbus, OH  
WVMX(FM) - Westerville, OH

Columbus, OH - BIA Market (36)

WNND(FM)

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

Scale 1:850,000



■ "Market A" Defining Contours

**"Market A" Defining Contours**

WBCO(AM) - BUCYRUS, OH

WQEL(FM) - Bucyrus, OH

***Exhibit 2.0***  
***Map of Stations***  
***Entering "Market A"***

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

FM Contours: 70 dB $\mu$  F(50:50)  
NED 03 sec Terrain Database  
NAD 1983 Coordinate Datum

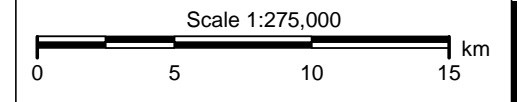
Wyandot

Crawford

WQEL(FM)

Richland

**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: 2

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WBCO(AM)	AM	1540 BUCYRUS	OH	BL20071004ADY	0.0	0.0
WQEL(FM)	FM	224A Bucyrus	OH	BLH20060303AAO	0.1	114.1

Distance and bearing calculations from coordinates: 40-45-51 N, 082-56-05 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.

**\*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.**