

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
WJAG, INC.
NORFOLK & PIERCE, NEBRASKA**

FEBRUARY 2022

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This engineering statement is submitted for the purpose of reflecting a Transfer of Control as pending in FCC file number 0000171561 for the commonly owned stations in the market. No facility technical changes are associated with this filing. This statement, supporting tabulations and figures have been prepared on behalf of **WJAG, INC.** This statement demonstrates **WJAG, INC.** compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of AM and FM broadcast facilities.

WJAG, INC. proposes continued common ownership in the following three stations:

WJAG(AM)	Norfolk, NE	780 kHz	1 kW	Facility ID 73121
KEXL(FM)	Pierce, NE	97.5 MHz	50 kW	Facility ID 170494
KQKX(FM)	Norfolk, NE	106.7 MHz	100 kW	Facility ID 73122

These three stations are considered as one market since there is a point of common overlap for all of the stations. A multiple ownership analysis was prepared considering the above described radio stations under proposed common ownership or control, which stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) in accordance with *Section 73.3555* of the FCC Rules.

RADIO MARKETS & METHODOLOGY

The radio market is defined as the area encompassed by the principal community contours (predicted or measured 5 mV/m groundwave contour for AM; predicted 3.16 mV/m contour for FM) of the stations that are both mutually overlapping and proposed to be “commonly attributable” post-transaction. The number of radio stations in this defined radio market (i.e., the numerator) will not exceed the limits set forth in *Section 73.3555(a)*. A commonly attributable station whose contour

overlaps the contour of some but not all of the contours of the stations that define the radio market was not counted toward the local radio ownership limits (i.e., is not counted in the numerator). None of the owned stations are licensed to a community which lies in a Nielsen defined Survey County. Since the stations are in counties which are not Nielsen Metro counties, stations counted as part of the market are determined on the basis of contour overlap.

Figure 1 depicts the principal community contours for all three stations for which continued common ownership is proposed. Figure 2 depicts other AM stations plus those depicted on Figure 1. Figure 3 depicts other FM stations plus those depicted on Figure 1.

Table I lists all AM stations whose 5 mV/m daytime contour duplicates some portion of the market. The contours for these stations are plotted on Figure 2 in black along with the market as depicted on Figure 1. Table I also lists all FM stations whose 70 dBu contour duplicates some portion of the market. The contours for these stations are plotted on Figure 3 in green along with the market.

Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's CDBS database using the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the methodology of 47 CFR 73.313. Terrain data was derived from the RadioSoft Comstudy high accuracy 3 second computer database for each of the FM stations, using radials spaced every 5 degrees of azimuth.

CONCLUSION

Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555(a)(1)(iii)* of the Commission's Rules. *Section 73.3555(a)(1)(iii)* states that 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). Since WJAG Inc. has 2 FMs and 1 AM, it complies with the rule.

There are 16 other FM and 6 other AM stations considered in this study which have principal community contours that overlap some portion of the attributable stations' principal community contours. All stations considered and found to be part of the market are listed in each market are listed in Table I.

The foregoing was prepared on behalf of **WJAG, INC.** by Clarence M. Beverage of *Communications Technologies, Inc.*, Medford, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The undersigned certifies, under penalty of perjury, that the statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By:



Clarence M. Beverage
for Communications Technologies, Inc.
Medford, New Jersey
February 22, 2022

TABLE I

AM COMMONLY OWNED AND OTHER AM STATIONS IN THE MARKET

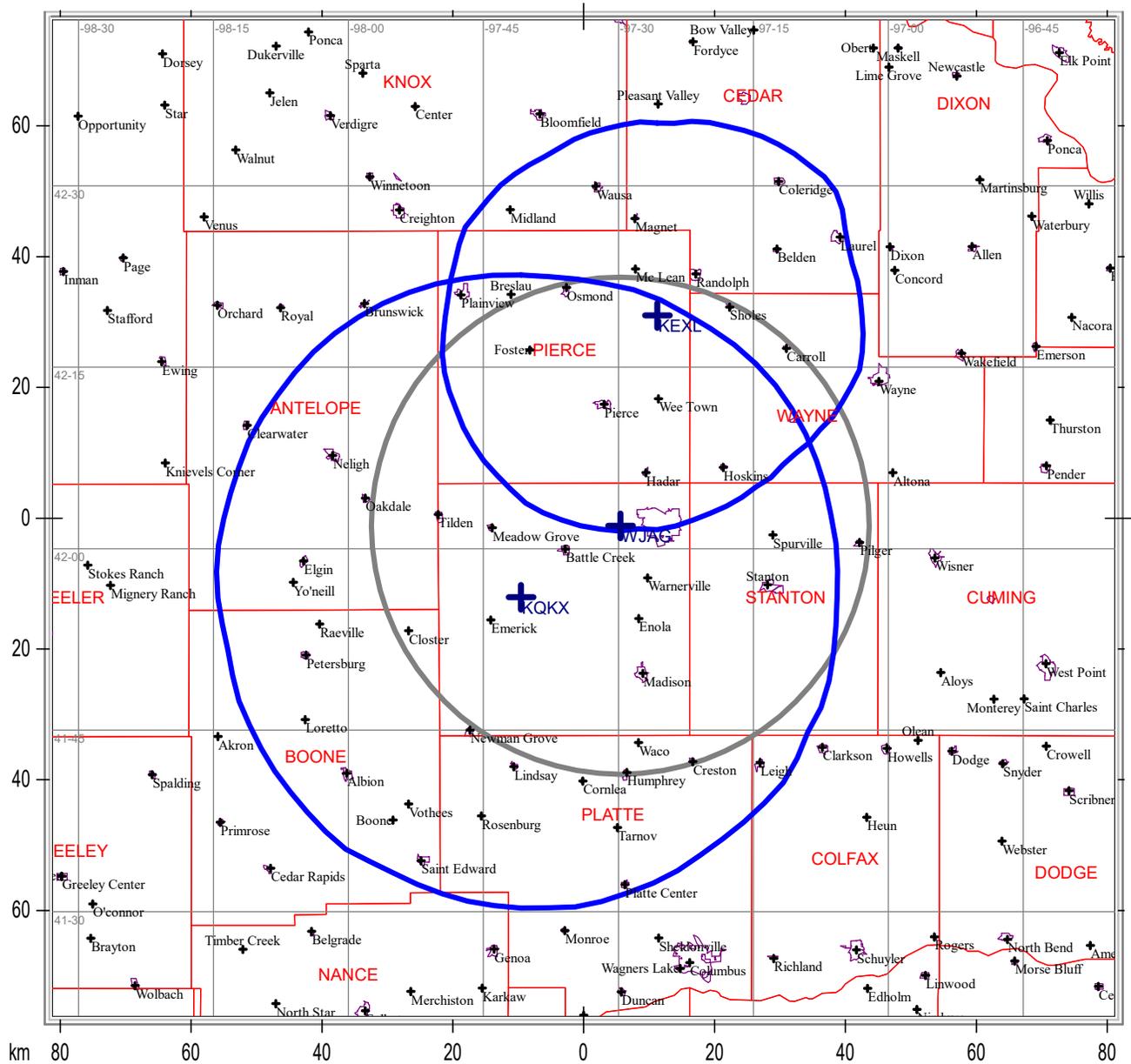
CALL ARN	ST	CITY OWNER	FREQ	PAT	AG	PWR	DESC
	LATITUDE	LONGITUDE					
WJAG BL10386 42-01-54.0 N	NE	NORFOLK WJAG, INC.	780.00000	LD		1.000	NDD
KJSK BL20130315AEI 41-26-23.0 N	NE	COLUMBUS Alpha 3E Licensee LLC Debtor-in-Possession	900.00000	LD		1.000	ND2
KMMJ BL7336 41-08-05.0 N	NE	GRAND ISLAND MYBRIDGE	750.00000	LU	AG	10.500	DA1
KTTT BL11983 41-27-14.0 N	NE	COLUMBUS Alpha 3E Licensee LLC Debtor-in-Possession	1510.00000	LD		0.500	NDD
KCTY BL19980226KA 42-14-04.0 N	NE	WAYNE WAYNE RADIO WORKS LLC	1590.00000	LD		2.500	DA2
WNAX BL19860411AI 42-54-47.0 N	SD	YANKTON SAGA COMMUNICATIONS OF SOUTH DAKOTA, LLC	570.00000	LD		5.000	DAN
KTIC BL20150831ADL 41-47-03.0 N	NE	WEST POINT NEBRASKA RURAL RADIO ASSOCIATION	840.00000	LD		5.000	NDD

FM COMMONLY OWNED AND OTHER FM STATIONS IN THE MARKET

CALL ARN LATITUDE	ST	CITY OWNER LONGITUDE	FREQ HAAT:m AMSL:m	CHN	CL	ERP	STAT
KGRD BLED-19990707KB 42-20-45.0 N	NE	ORCHARD THE PRAISE NETWORK, INC. 98-25-06.3 W	105.30000 63.128 744.000		C1	100000.00	LIC
KUSO BLH-20000518AAA 41-49-50.0 N	NE	ALBION FLOOD COMMUNICATIONS, L.L.C. 97-41-13.2 W	92.70000 83.629 689.000		C2	50000.00	LIC
KNEN BLH-20060420ABO 41-55-28.0 N	NE	NORFOLK RED BEACON COMMUNICATIONS, LLC 97-36-23.2 W	94.70000 99.147 682.600		C1	100000.00	LIC
KZEN 0000129796 41-32-28.0 N	NE	CENTRAL CITY ALPHA 3E LICENSEE LLC 97-40-46.2 W	100.30000 495.320 1071.000		C	100000.00	LIC
KKOT BLH-19910822KC 41-32-28.0 N	NE	COLUMBUS ALPHA 3E LICENSEE LLC DEBTOR-IN-POSSESSION 97-40-46.2 W	93.50000 233.941 808.000		C1	100000.00	LIC
KQKX BLH-20080401AXA 41-55-59.0 N	NE	NORFOLK WJAG INCORPORATED 97-40-50.2 W	106.70000 208.569 801.600		C1	100000.00	LIC
KGKD BLED-20130405AAK 41-32-28.0 N	NE	COLUMBUS THE PRAISE NETWORK, INC. 97-40-46.2 W	90.50000 95.772 672.000		C2	10000.00	LIC
KTIC-FM BLH-20080910AAW 41-52-53.0 N	NE	WEST POINT NEBRASKA RURAL RADIO ASSOCIATION 97-00-59.1 W	107.90000 117.047 652.900		C2	33000.00	LIC
KLIR BMLH-20151228BCC 41-16-54.4 N	NE	COLUMBUS ALPHA 3E LICENSEE LLC DEBTOR-IN-POSSESSION 97-24-32.4 W	101.10000 171.476 710.000		C1	100000.00	LIC
KKYA BLH-19821201AN 42-43-48.9 N	SD	YANKTON RIVERFRONT BROADCASTING LLC 97-24-14.2 W	93.10000 84.471 575.000		C1	100000.00	LIC
WNAX-FM BLH-19891026KA 42-38-23.9 N	SD	YANKTON SAGA COMMUNICATIONS OF SOUTH DAKOTA, LLC 97-03-22.1 W	104.10000 248.745 726.000		C1	100000.00	LIC
KVLD BLED-20110216ACJ 42-01-56.0 N	NE	NORFOLK EDUCATIONAL MEDIA FOUNDATION 97-22-08.2 W	91.70000 60.402 614.000		A	1700.00	LIC

CALL ARN	ST	CITY OWNER	FREQ	CHN	CL	ERP	STAT
LATITUDE	LONGITUDE	HAAT:m AMSL:m					
KOLB BLED-20110718ACZ 42-23-43.9 N	NE	HARTINGTON VSS CATHOLIC COMMUNICATIONS, INC.	88.30000		C1	100000.00	LIC
		97-37-18.1 W	70.487			652.300	
KEXL BLH-20190102AAZ 42-19-17.0 N	NE	PIERCE WJAG INCORPORATED	97.50000		C2	50000.00	LIC
		97-25-41.2 W	68.396			669.000	
KTCH BLH-20130307AAJ 42-14-04.0 N	NE	EMERSON WAYNE RADIO WORKS LLC	104.90000		C3	25000.00	LIC
		97-03-21.2 W	11.538			559.000	
KDAM BLH-20100701AHP 42-43-49.0 N	NE	HARTINGTON RIVERFRONT BROADCASTING LLC	94.30000		C2	50000.00	LIC
		97-24-13.0 W	37.171			539.000	
KWSC BLED-20170124AAB 42-14-37.0 N	NE	WAYNE WAYNE STATE COLLEGE	91.90000		A	320.00	LIC
		97-00-35.2 W	-28.636			487.900	
KPNO BLED-20031014AMI 42-06-16.0 N	NE	NORFOLK THE PRAISE NETWORK, INC.	90.90000		C1	100000.00	LIC
		97-20-12.2 W	46.370			611.000	

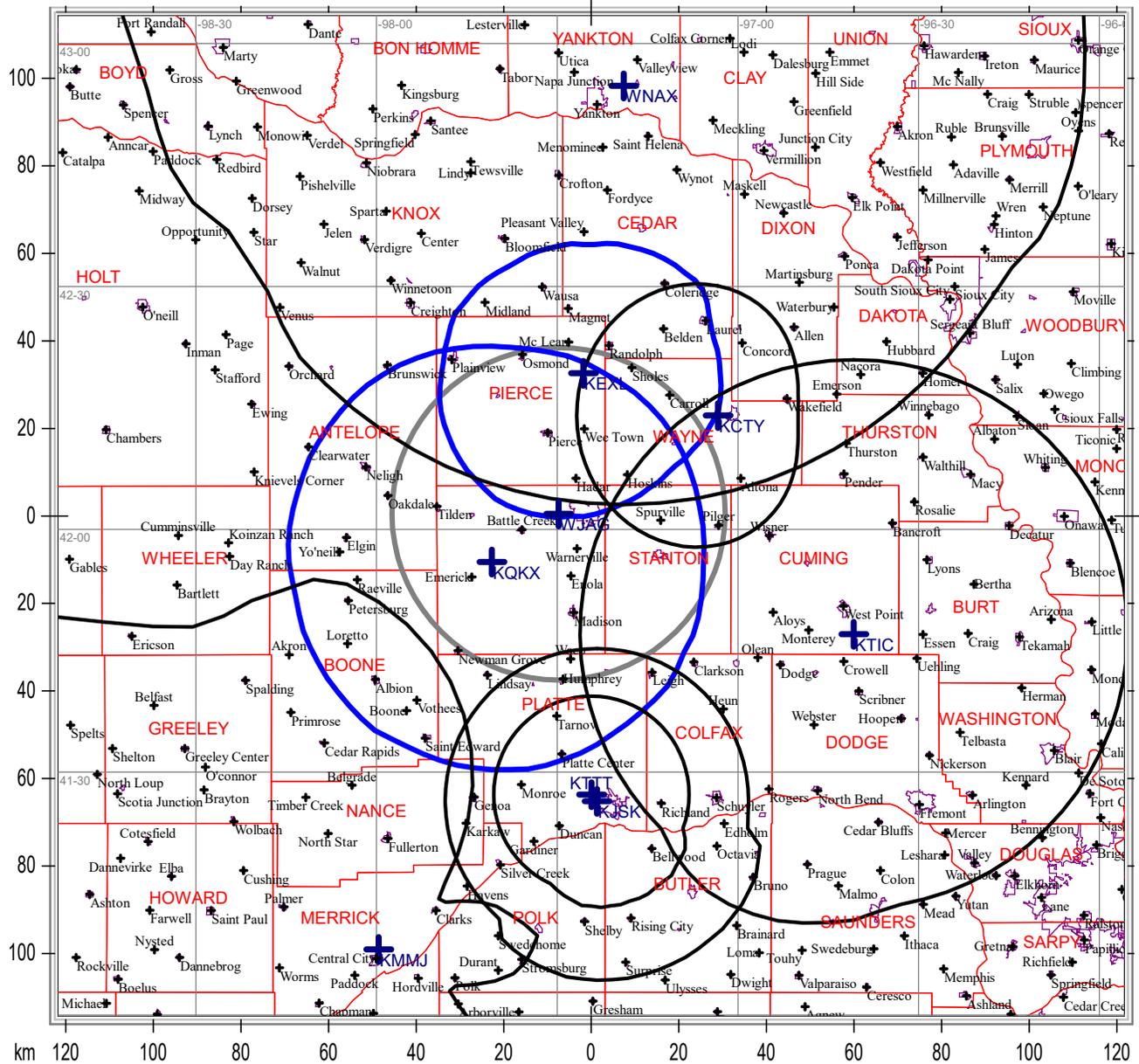
WJAG, INC. NORFOLK & PIERCE, NEBRASKA MARKET GREY = AM 5 mV/m BLUE = FM 70 dBu



Communications Technologies, Inc. Medford, New Jersey

County Borders City Borders Lat/Lon Grid

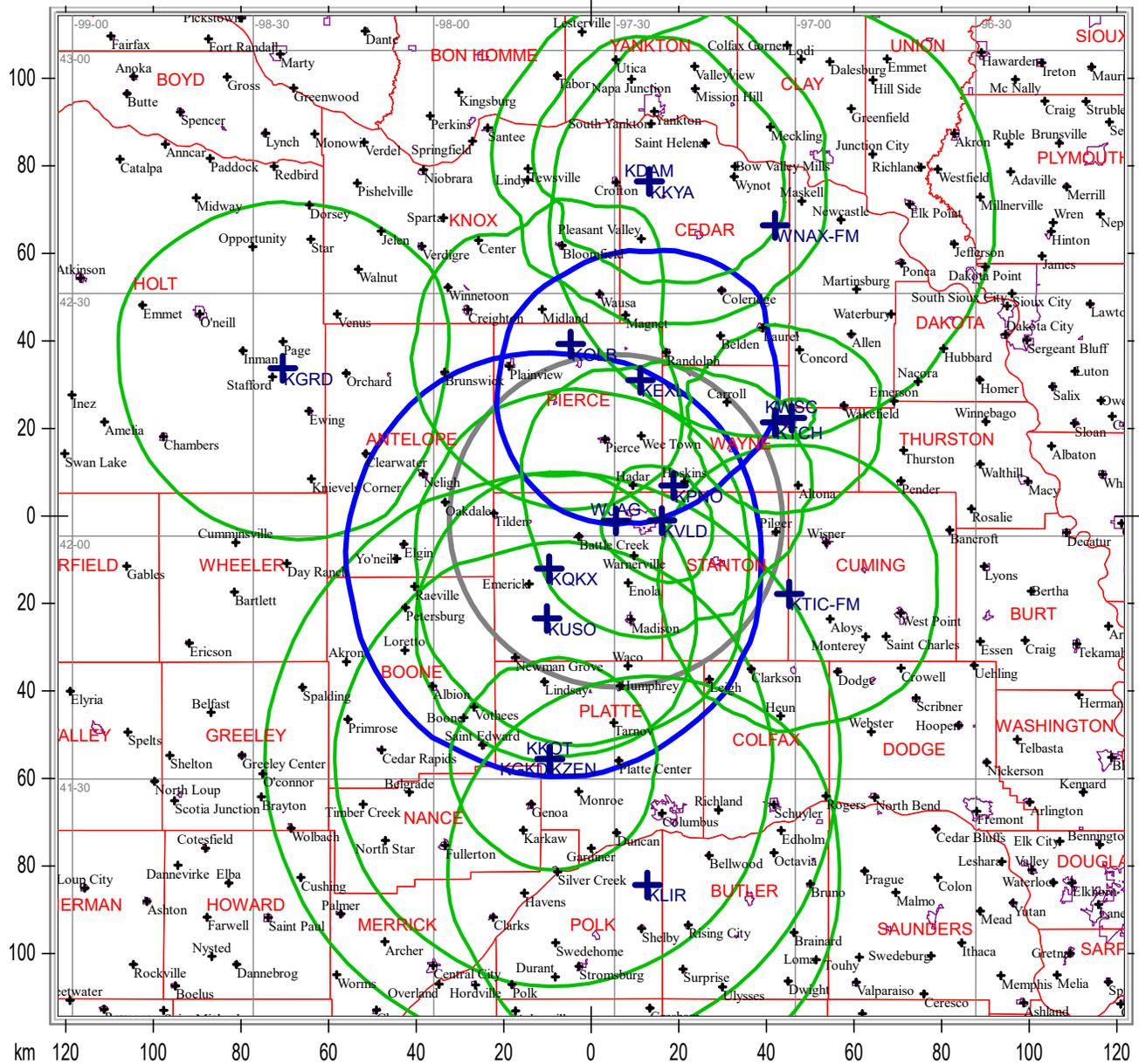
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