

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

FEBRUARY 2022

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
WJAG, INC.
NORFOLK & PIERCE, NEBRASKA
FEBRUARY 2022**

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 FM's 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. 97-29-47.0 W	780.00000	LD		1.000	NDD
KJSK BL20130315AEI 41-26-23.0 N	NE	COLUMBUS Alpha 3E Licensee LLC Debtor-in-Possession 97-23-25.0 W	900.00000	LD		1.000	ND2
KMMJ BL7336 41-08-05.0 N	NE	GRAND ISLAND MYBRIDGE 97-59-38.0 W	750.00000	LU	AG	10.500	DA1
KTTT BL11983 41-27-14.0 N	NE	COLUMBUS Alpha 3E Licensee LLC Debtor-in-Possession 97-24-20.0 W	1510.00000	LD		0.500	NDD
KCTY BL19980226KA 42-14-04.0 N	NE	WAYNE WAYNE RADIO WORKS LLC 97-03-19.0 W	1590.00000	LD		2.500	DA2
WNAX BL19860411AI 42-54-47.0 N	SD	YANKTON SAGA COMMUNICATIONS OF SOUTH DAKOTA, LLC 97-18-58.0 W	570.00000	LD		5.000	DAN
KTIC BL20150831ADL 41-47-03.0 N	NE	WEST POINT NEBRASKA RURAL RADIO ASSOCIATION 96-40-46.0 W	840.00000	LD		5.000	NDD

FM COMMONLY OWNED AND OTHER FM STATIONS IN THE MARKET

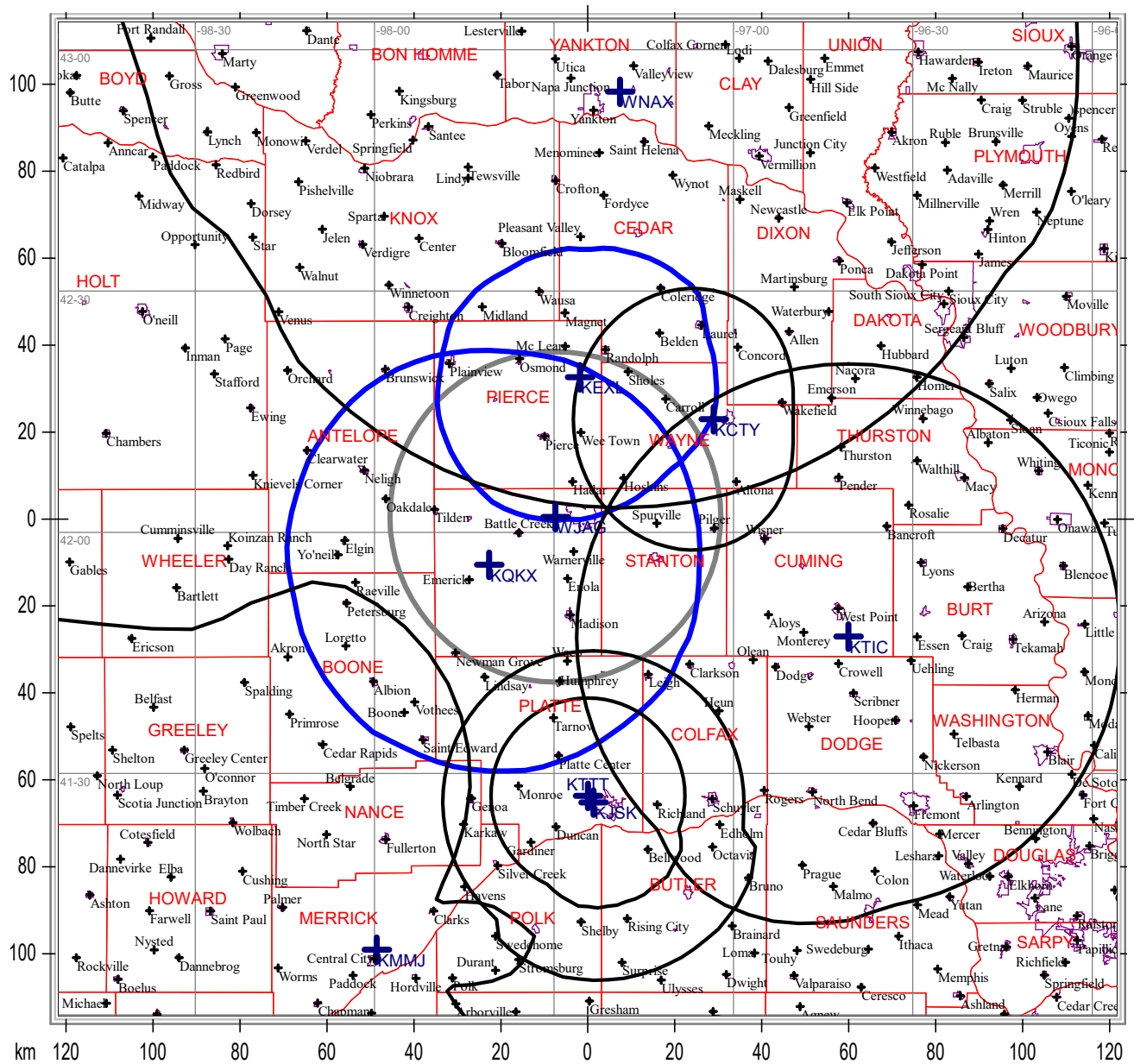
CALL ARN LATITUDE	ST OWNER LONGITUDE	CITY HAAT:m AMSL:m	FREQ	CHN	CL	ERP	STAT
KGRD	NE	ORCHARD	105.30000		C1	100000.00	LIC
BLED-19990707KB THE PRAISE NETWORK, INC.							
42-20-45.0 N 98-25-06.3 W 63.128 744.000							
KUSO	NE	ALBION	92.70000		C2	50000.00	LIC
BLH-20000518AAA FLOOD COMMUNICATIONS, L.L.C.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

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

The map displays the state of Nebraska with its county boundaries and major cities. The flight paths of the Space Shuttle Challenger (STS-51-L) and the Space Shuttle Columbia (STS-51-L) are shown as blue lines. The Challenger path is a large loop covering most of the state, while the Columbia path is a smaller loop in the central region. The map also includes latitude and longitude coordinates and labels for various counties and cities.

Figure 1

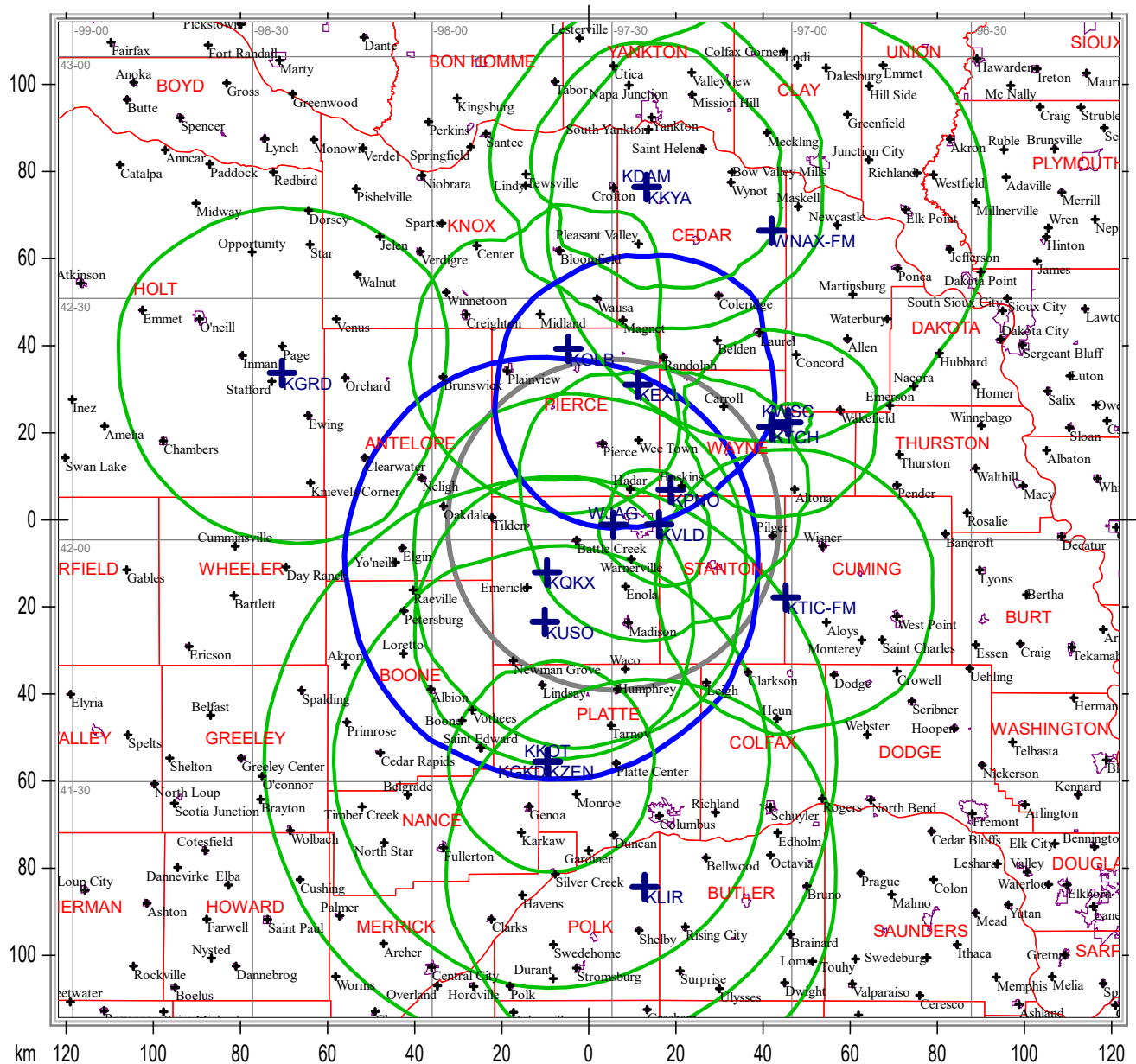
WJAG, INC. NORFOLK & PIERCE, NEBRASKA MARKET GREY = AM 5 mV/m BLUE = FM 70 dBu



Communications Technologies, Inc. Medford, New Jersey

— County Borders
 — City Borders
 — Lat/Lon Grid

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