

MULTIPLE OWNERSHIP CONSIDERATIONS

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Champaign Multimedia Group, LLC.
Danville, IL

This engineering statement is prepared on behalf of Champaign Multimedia Group, LLC, the proposed assignee of the following three stations in Danville, Illinois:

WDAN(AM) - Danville, IL - 1490 kHz
WRHK(FM) - Danville, IL - Channel 235A
WDNL(FM) - Danville, IL - Channel 271B

It documents that the acquisition of these three stations, in conjunction with the present ownership of WDWS(AM) - Champaign, Illinois, WHMS-FM - Champaign, Illinois, and WKIO(FM) - Arcola, Illinois, will fully comply with the local radio ownership restrictions outlined in Section 73.3555 of the FCC Rules.

None of these stations are considered to be “home” to any Nielsen Audio metro market. Furthermore, neither Danville, Champaign, or Arcola is located within the boundaries of any metro market. For this reason, as required by Paragraph 286 of the FCC’s July 2, 2003 *Report and Order and Notice of Proposed Rulemaking* in MB Dockets 02-277, 01-235, 01-317, 00-244, and 03-130, it was necessary to conduct contour overlap studies for these commonly owned stations.

Attached is a map exhibit depicting the principal community contours for these three stations, as well as the principal community contour for WHMS-FM, which has principal community contour overlap with WDNL.¹ The 5 mV/m daytime contour for WDAN was projected utilizing the notified daytime facilities from the FCC’s License Management System (“LMS”) and soil conductivity data from FCC Figure M3. The 3.16 mV/m contours for WRHK, WDNL, and WHMS-FM were projected using the notified

¹None of the three stations being acquired has principal community contour overlap with any other commonly owned station, including the stations simultaneously being acquired in the Decatur, Illinois area.

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facilities for each station from the LMS and terrain data extracted from the NGDC 30 second terrain database. As shown in this figure, there are two different areas of common principal community contour overlap between these four commonly owned stations. Thus, these four radio stations are considered to form two contour based markets for the purposes of this analysis.

Attached is a map exhibit that depicts the composite principal community contour for the first of these contour based markets (Market #1), which is defined by WDAN, WRHK and WDNL. Also shown in this figure are the transmitter sites of all operating stations located within this composite contour.² Attached is a tabulation of the stations depicted in this figure. As shown by this data, there are 9 stations, including WDAN, WRHK and WDNL, in this contour based market. Thus, it can be safely said that there are at least nine stations in the contour based market defined by the principal community contours of these three stations. In fact, the number of stations in this market would be even greater if stations located outside this composite contour whose principal community contours overlap this composite contour were included in this total. No such further analysis is required in this case, however, since, In markets containing fourteen or fewer stations, Section 73.3555(a)(1)(iv) of the FCC Rules permits the common ownership of up to 5 commercial stations, not more than 3 of which are in the same service, provided that the total number of commonly owned stations does not exceed 50% of the stations in the market. The instant situation involves the common ownership of one

²Any commonly owned station that is inside any of these composite contours, that does not define the market, is not included in either the map exhibits or in the tabulation of stations.

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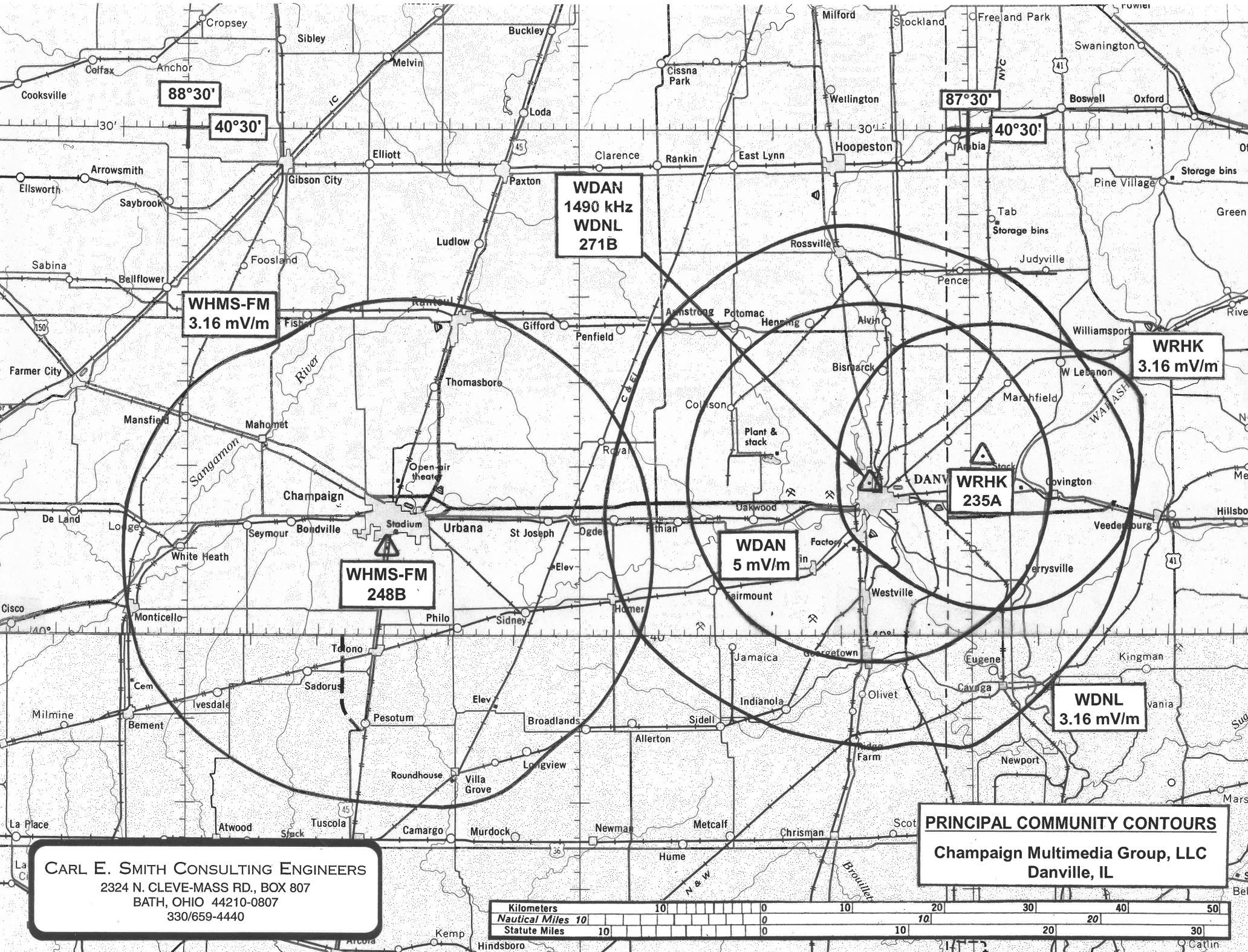
AM station and two FM stations in this contour based market, which does not exceed the permitted maximum.

Also attached is a map exhibit that depicts the composite principal community contour for the second of these contour based markets (Market #2), which is defined by WDNL and WHMS-FM. Also shown in this figure are the transmitter sites of all operating stations located within this composite contour. Attached is a tabulation of the stations depicted in this figure. As shown by this data, there are 21 stations, including WDML and WHMS-FM in this contour based market. Thus, it can be safely said that there are at least 21 stations in the contour based market defined by the principal community contours of these two stations. In fact, the number of stations in this market would be even greater if stations located outside this composite contour whose principal community contours overlap this composite contour were included in this total. No such further analysis is required in this case, however, since in markets containing between 15 and 29 stations, Section 73.3555(a)(1)(iii) of the FCC Rules permits common ownership of up to six commercial stations, no more than four of which are in the same service. The instant situation involves the common ownership of two FM stations in this contour based market, which does not exceed the permitted maximum.

Based on the above information, the proposed acquisition of these three stations will fully comply with the FCC's local radio ownership rule.

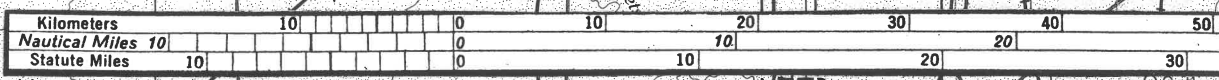
/s/ Roy P. Stype, III

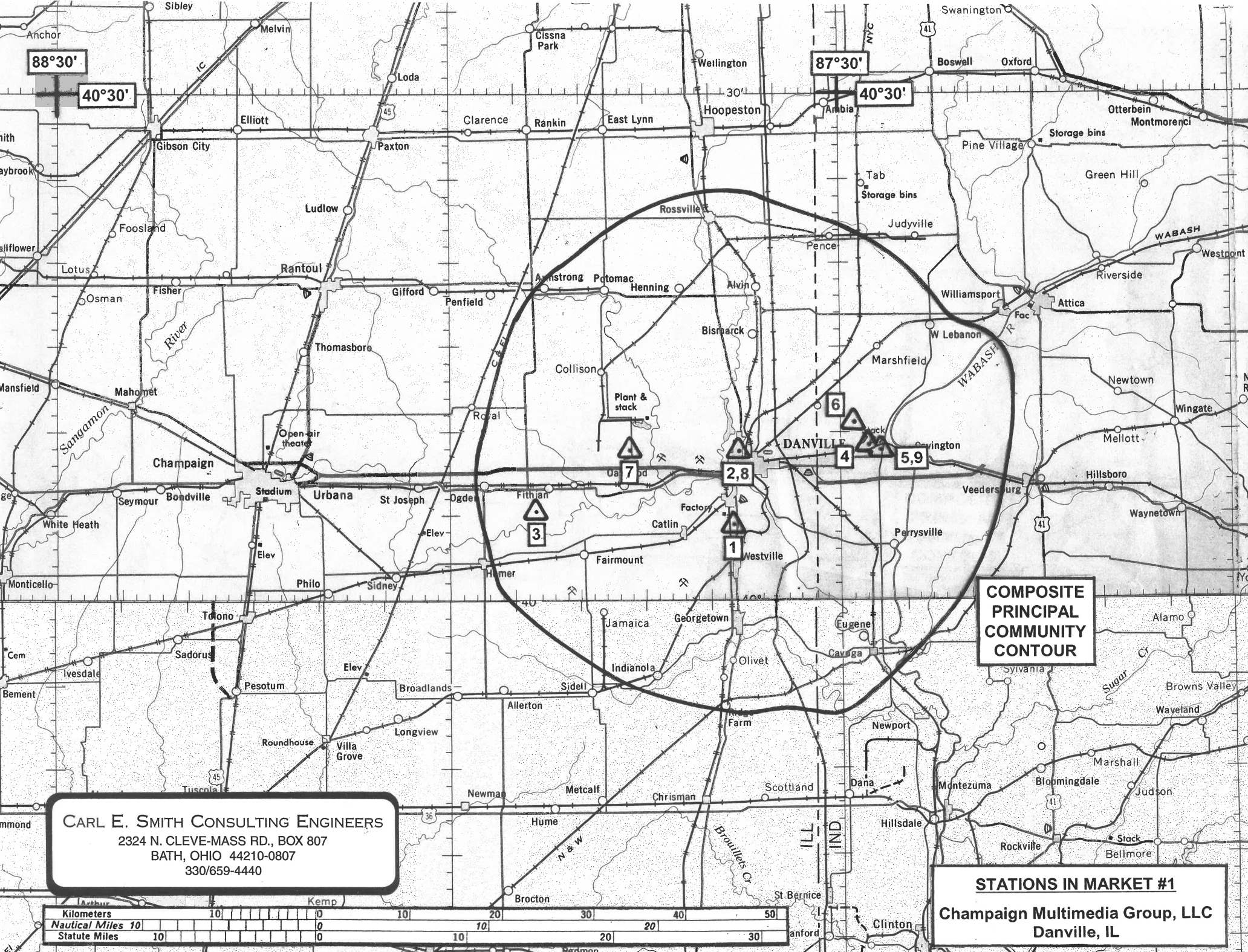
January 30, 2024



CARL E. SMITH CONSULTING ENGINEERS
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BATH, OHIO 44210-0807
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PRINCIPAL COMMUNITY CONTOURS
Champaign Multimedia Group, LLC
Danville, IL





88°30'

40°30'

87°30'

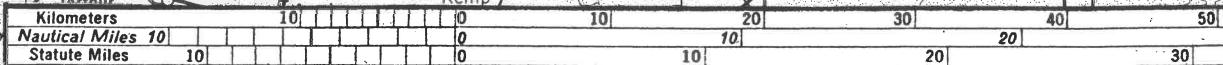
40°30'

**COMPOSITE
PRINCIPAL
COMMUNITY
CONTOUR**

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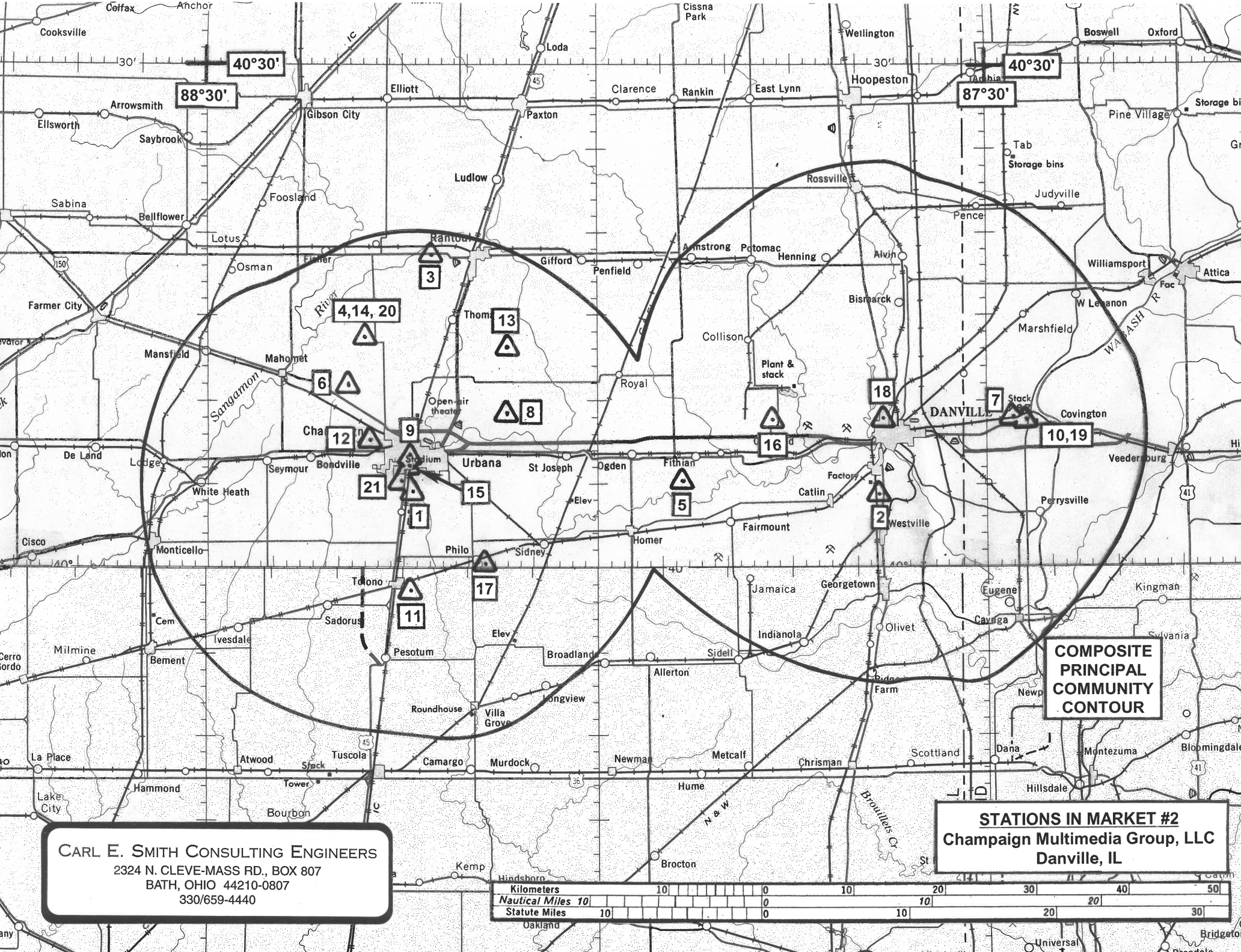
STATIONS IN MARKET #1

Champaign Multimedia Group, LLC
Danville, IL



STATIONS IN MARKET #1
Champaign Multimedia Group, LLC.
Danville, IL

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
1	WITY	980	Danville, IL
2	WDAN	1490	Danville, IL
3	WGNJ	207B	St. Joseph, IL
4	WFOF	212B1	Covington, IN
5	WSKL	225A	Veedersburg, IN
6	WRHK	235A	Danville, IL
7	WYXY	256B	Savoy, IL
8	WDNL	271B	Danville, IL
9	WKZS	276A	Covington, IN



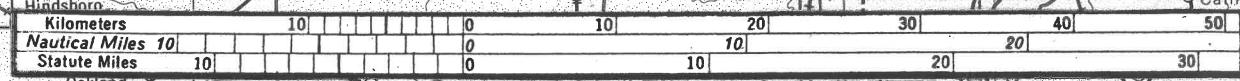
40°30'
88°30'

40°30'
87°30'

**COMPOSITE
PRINCIPAL
COMMUNITY
CONTOUR**

STATIONS IN MARKET #2
Champaign Multimedia Group, LLC
Danville, IL

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STATIONS IN MARKET #2
Champaign Multimedia Group, LLC.
Danville, IL

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
1	WILL	580	Urbana, IL
2	WITY	980	Danville, IL
3	WKJR	1460	Rantoul, IL
4	WPCD	204B1	Champaign, IL
5	WGNJ	207B	St. Joseph, IL
6	WEFT	211B1	Champaign, IL
7	WFOF	212B1	Covington, IN
8	WBGL	219B	Champaign, IL
9	WREE	223B1	Urbana, IL
10	WSKL	225A	Veedersburg, IN
11	WSJK	228A	Tuscola, IL
12	WLRW	233B	Champaign, IL
13	WJEK	237A	Rantoul, IL
14	WQQB	241A	Rantoul, IL
15	WHMS-FM	248B	Champaign, IL
16	WYXY	256B	Savoy, IL
17	WIXY	262B1	Champaign, IL
18	WDNL	271B	Danville, IL
19	WKZS	276A	Covington, IN
20	WGKC	290A	Mahomet, IL
21	WPGU	296A	Urbana, IL