

MULTIPLE OWNERSHIP CONSIDERATIONS

(Page 1 of 11)

Champaign Multimedia Group, LLC.

Decatur, IL

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

WDZ(AM) - Decatur, IL - 1050 kHz
WSOY(AM) - Decatur, IL - 1340 kHz
WDZQ(FM)- Decatur, IL - Channel 236B
WSOY-FM - Decatur, IL - Channel 275B
WCZQ(FM) - Monticello, IL - Channel 288A

It documents that the acquisition of these five 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 Decatur, Monticello, 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 five stations, as well as the principal community contours for WDWS and WHMS-FM, which have principal community contour overlap with WCZQ.¹ The 5 mV/m daytime contours for WDZ, WSOY, and WDWS were projected utilizing the notified daytime facilities from the FCC’s License Management System (“LMS”) and soil conductivity data

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

MULTIPLE OWNERSHIP CONSIDERATIONS

(Page 2 of 11)

Champaign Multimedia Group, LLC.

Decatur, IL

from FCC Figure M3. The 3.16 mV/m contours for WDZQ, WSOY-FM, WCZQ and WHMS-FM were projected using the notified 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 three different areas of common principal community contour overlap between these seven commonly owned stations. Thus, these seven radio stations are considered to form three 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 WDZ, WSOY, WDZQ and WSOY-FM. 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 17 stations, including WDZ, WSOY, WDZQ and WSOY-FM, in this contour based market. Thus, it can be safely said that there are at least seventeen stations in the contour based market defined by the principal community contours of these four 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

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.

MULTIPLE OWNERSHIP CONSIDERATIONS

(Page 3 of 11)

Champaign Multimedia Group, LLC.

Decatur, IL

two AM stations 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 WDZ, WSOY-FM and WCZQ. 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 13 stations, including WDZ, WSOY-FM and WCZQ in this contour based market. Thus, it can be safely said that there are at least thirteen 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 AM station and two FM stations in this contour based market, which does not exceed the permitted maximum.

Attached is a map exhibit that depicts the composite principal community contour for the third of these contour based markets (Market #3), which is defined by WCZQ, WDWS and WHMS-FM. Also shown in this figure are the transmitter sites of all operat-

MULTIPLE OWNERSHIP CONSIDERATIONS

(Page 4 of 11)

Champaign Multimedia Group, LLC.

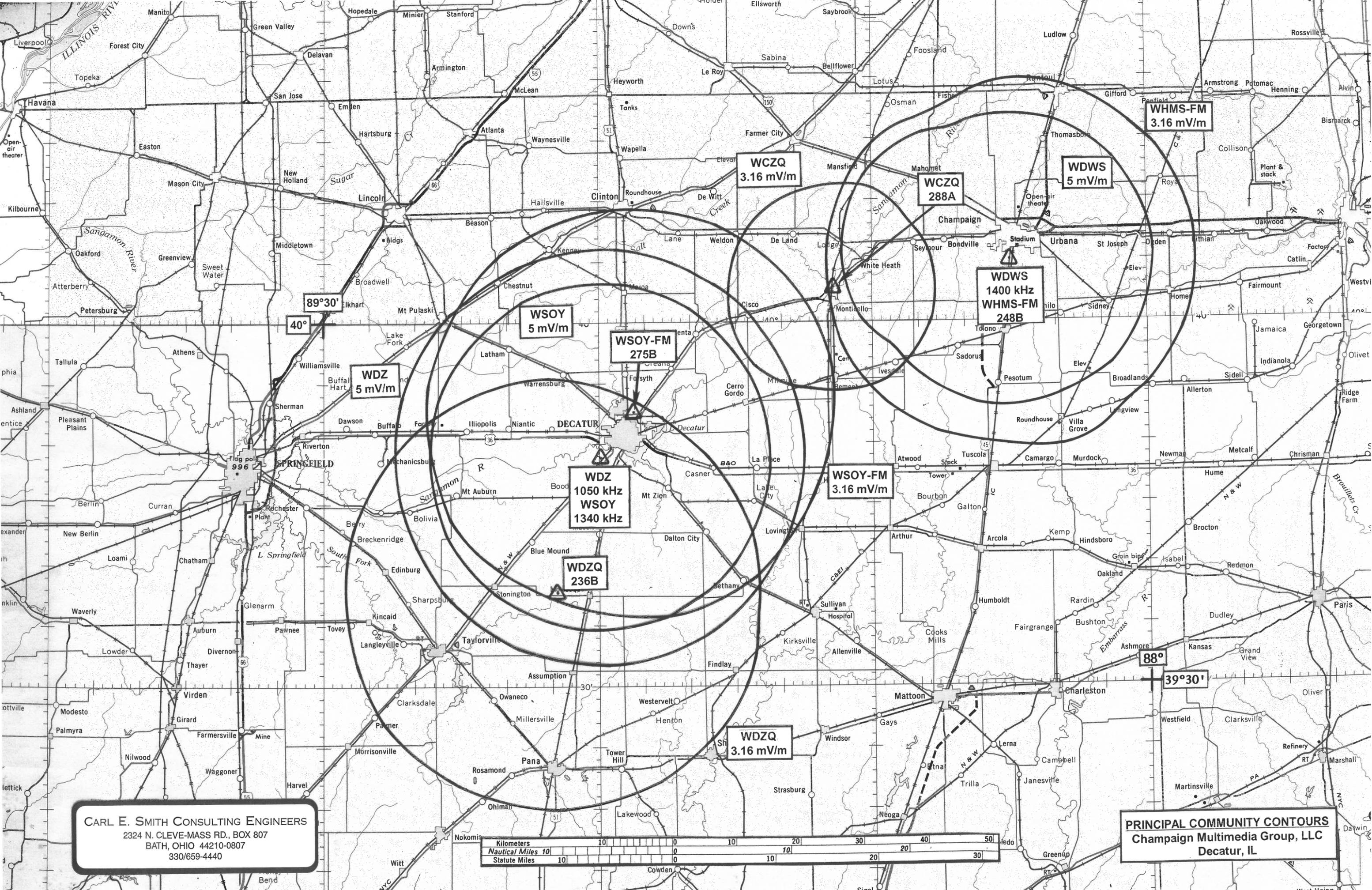
Decatur, IL

ing stations located within this composite contour. Attached is a tabulation of the stations depicted in this figure. As shown by this data, there are 17 stations, including WCZQ, WDWS and WHMS-FM, in this contour based market. Thus, it can be safely said that there are at least seventeen stations in the contour based market defined by the principal community contours of these three stations. 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 one AM and two FM stations in this contour based market, which does not exceed the permitted maximum.

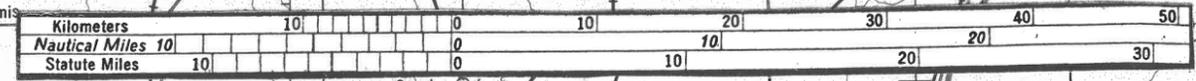
Based on the above information, the proposed acquisition of these five stations will fully comply with the FCC's local radio ownership rule.

/s/ Roy P. Stype, III

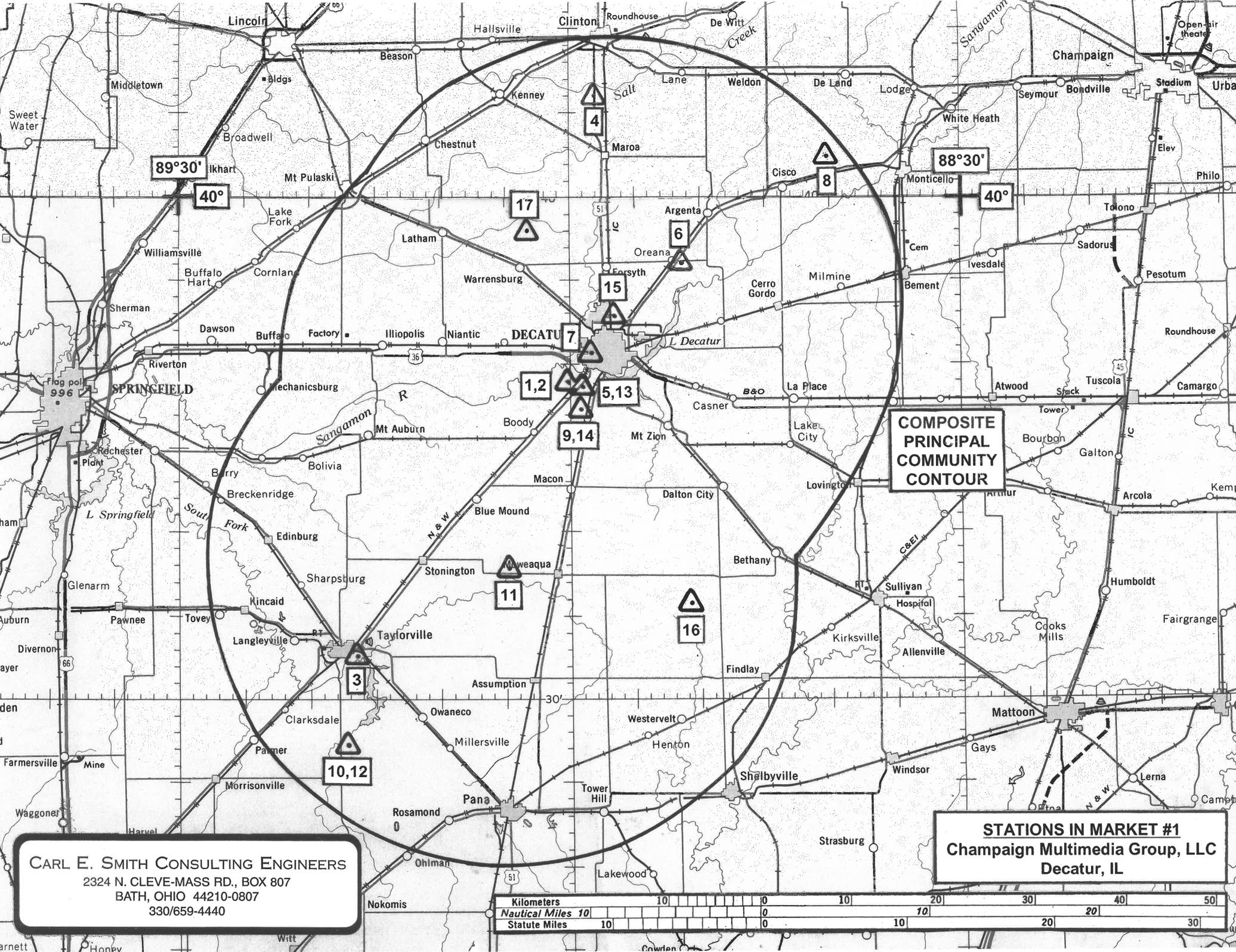
January 30, 2024



CARL E. SMITH CONSULTING ENGINEERS
 2324 N. CLEVE-MASS RD., BOX 807
 BATH, OHIO 44210-0807
 330/659-4440



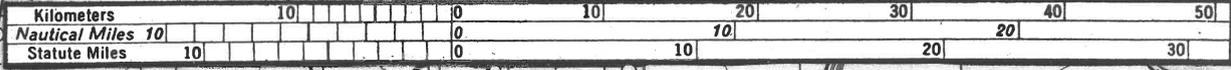
PRINCIPAL COMMUNITY CONTOURS
 Champaign Multimedia Group, LLC
 Decatur, IL



**COMPOSITE
PRINCIPAL
COMMUNITY
CONTOUR**

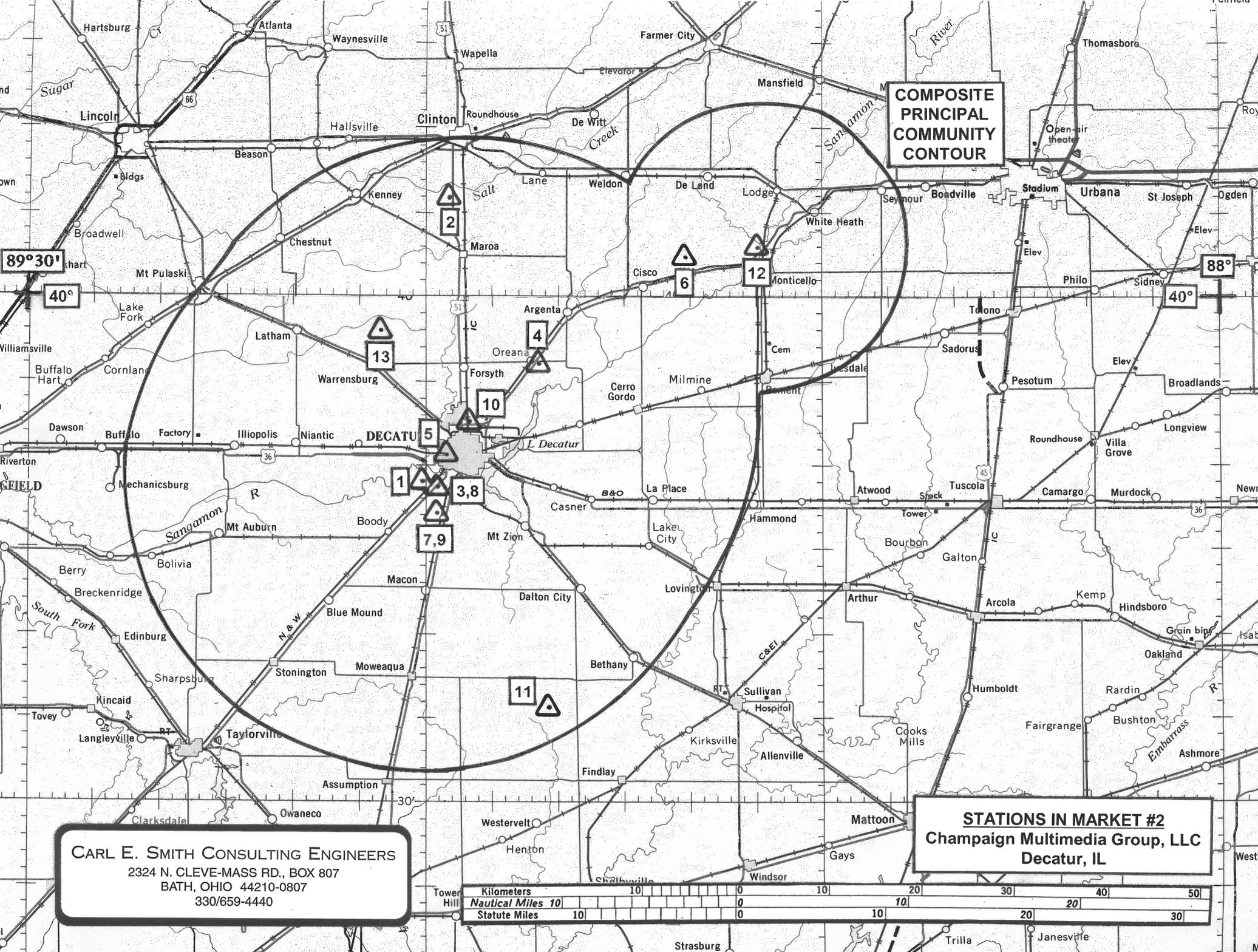
STATIONS IN MARKET #1
Champaign Multimedia Group, LLC
Decatur, IL

CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440



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

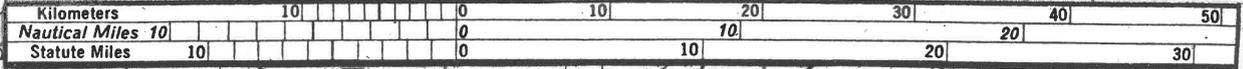
<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
1	WDZ	1050	Decatur, IL
2	WSOY	1340	Decatur, IL
3	WIHM	1410	Taylorville, IL
4	WHOW	1520	Clinton, IL
5	WNLD	201A	Decatur, IL
6	WDCR	205A	Oreana, IL
7	WJMU	208A	Decatur, IL
8	WILL-FM	215B	Urbana, IL
9	WYDS	226A	Decatur, IL
10	WMKR	232A	Pana, IL
11	WDZQ	236B	Decatur, IL
12	WRAN	247A	Taylorville, IL
13	WXFM-FM	257A	Mount Zion, IL
14	WZUS	265A	Macon, IL
15	WSOY-FM	275B	Decatur, IL
16	WEJT	286B1	Shelbyville, IL
17	WDKR	297A	Maroa, IL



**COMPOSITE
PRINCIPAL
COMMUNITY
CONTOUR**

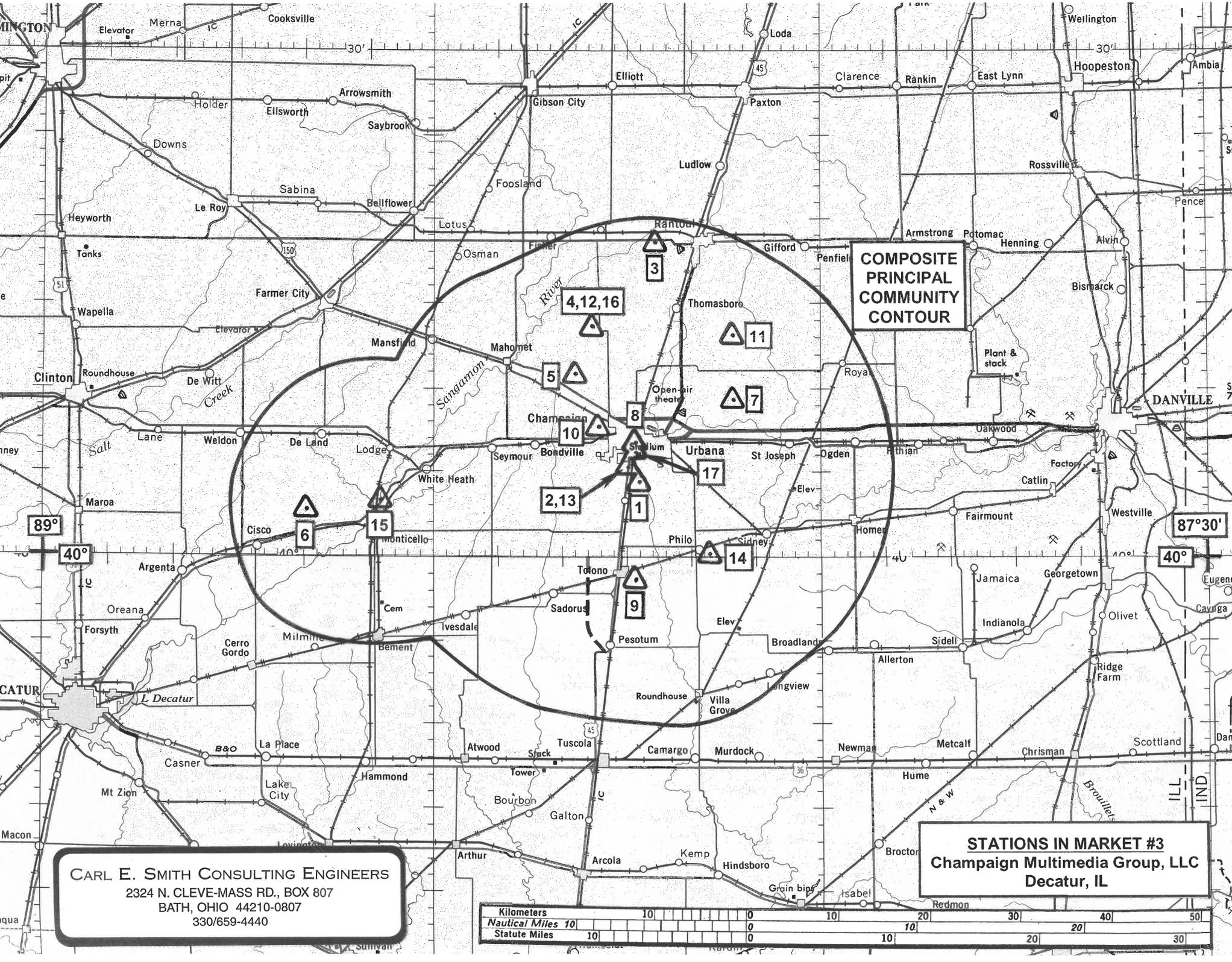
STATIONS IN MARKET #2
Champaign Multimedia Group, LLC
Decatur, IL

CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440



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

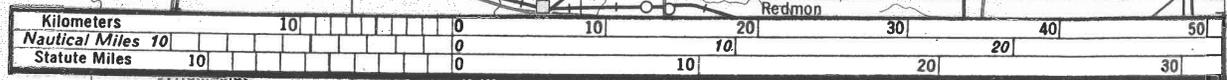
<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
1	WDZ	1050	Decatur, IL
2	WHOW	1520	Clinton, IL
3	WNLD	201A	Decatur, IL
4	WDCR	205A	Oreana, IL
5	WJMU	208A	Decatur, IL
6	WILL-FM	215B	Urbana, IL
7	WYDS	226A	Decatur, IL
8	WXFM-FM	257A	Mount Zion, IL
9	WZUS	265A	Macon, IL
10	WSOY-FM	275B	Decatur, IL
11	WEJT	286B1	Shelbyville, IL
12	WCZQ	288A	Monticello, IL
13	WDKR	297A	Maroa, IL



**COMPOSITE
PRINCIPAL
COMMUNITY
CONTOUR**

STATIONS IN MARKET #3
Champaign Multimedia Group, LLC
Decatur, IL

CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440



STATIONS IN MARKET #3
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	WDWS	1400	Danville, IL
3	WKJR	1460	Rantoul, IL
4	WPCD	204B1	Champaign, IL
5	WEFT	211B1	Champaign, IL
6	WILL-FM	215B	Urbana, IL
7	WBGL	219B	Champaign, IL
8	WREE	223B1	Urbana, IL
9	WSJK	228A	Tuscola, IL
10	WLRW	233B	Champaign, IL
11	WJEK	237A	Rantoul, IL
12	WQQB	241A	Rantoul, IL
13	WHMS-FM	248B	Champaign, IL
14	WIXY	262B1	Champaign, IL
15	WCZQ	288A	Monticello, IL
16	WGKC	290A	Mahomet, IL
17	WPGU	296A	Urbana, IL