



**STATEMENT OF WILLIAM J. GETZ  
IN SUPPORT OF AN APPLICATION  
FOR CONSENT TO ASSIGNMENT  
OF BROADCAST LICENSE**

I am a Radio Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. This office has been authorized by the Applicant to prepare this statement and the associated exhibits in support of an Application for Consent to Assignment of Broadcast License (FCC Form 314) in order to acquire the following full-service radio stations<sup>1</sup>:

- WENI-FM, South Waverly, PA (Facility ID 77925)
- WKPQ(FM), Hornell, NY (Facility ID 5309)
- WMXO(FM), Olean, NY (Facility ID 19710)
- WQRS(FM), Salamanca, NY (Facility ID 9408)
- WGMM(FM), Corning, NY (Facility ID 19651)
- WENY(AM), Elmira, NY (Facility ID 71510)
- WENI(AM), Corning, NY (Facility ID 53610)
- WOEN(AM), Olean, NY (Facility ID 19708)
- WCIG(FM), Dallas, PA (Facility ID 19564)

Exhibit A depicts the principal community contours of the proposed station acquisitions and the principal community contours of the radio stations in which the applicant currently holds

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<sup>1</sup> All of the stations listed with the exception of WCIG(FM) are part of a transaction with Sound Communications, LLC. The proposed acquisition of WCIG(FM) is part of an associated transaction with Family Life Ministries, Inc. This list of stations represents all of the full service radio stations in which the Applicant will hold attributable interest after all planned divestments in connection with both transactions (see Legal Exhibit for full accounting of transaction).

attributable interest.<sup>2</sup> As illustrated in Exhibit B, the principal community contours of certain proposed station acquisitions in the Elmira-Corning Nielsen Radio Metro area overlap the principal community contours of stations the Applicant currently own which are licensed to a community which is located outside of Nielsen Radio Metro Areas. In the Olean, New York area all of the subject stations are licensed to a community which is located wholly within the Olean, NY Nielsen Radio Metro Area. Finally, as shown in Exhibit A, the proposed acquisition of WCIG(FM), Dallas, PA does not implicate the multiple ownership rules, because the Applicant has no attributable interest in any full service stations near WCIG(FM). Accordingly, this material demonstrates that the common ownership of the stations listed above is compliant with Section 73.3555 of the FCC Rules as it applies to both the contour-defined radio market (for the Elmira, NY area stations) and the Nielsen-rated Geographic radio markets (for the Elmira-Corning, NY market and the Olean, NY market).

#### Multiple Ownership Geographic Market Analysis

##### Elmira-Corning Market

Attached is a BIA Market Report which lists the 26 stations counted in the Elmira-Corning, NY, Geographic Market. Considering the proposed combination of stations, the Applicant will hold attributable interest in four FM Stations (WCBF, WGMM, WKPQ and WNKI) and two AM stations (WENI and WENY) in the market.

Pursuant to Section 73.3555(a)(1)(iii) of the FCC Rules, the applicant is permitted to own six radio stations (four in the same service) provided the market contains at least fifteen stations. Because the Geographic Market contains 26 stations, the proposed station acquisitions result in a

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<sup>2</sup> For the FM stations considered herein, the principal community contour is the predicted 3.16 mV/m (70 dBu) contour computed in accordance with Section 73.313 of the FCC Rules. For the AM stations considered herein, the principal community contour is the predicted daytime 5.0 mV/m groundwave contour computed in accordance with Section 73.183 of the FCC Rules. All stations represented herein are operating full service commercial or noncommercial radio stations and operate from transmitter sites located within 92 kilometers of the perimeter of the Subject Station's mutual 70 dBu contour overlap area.

combination of stations which satisfy the multiple ownership criteria set forth in Section 73.3555 of the FCC Rules.

Olean Market

The BIA Market Report listing the 28 stations counted in the Olean, NY, Geographic Market is attached. Considering the proposed combination of stations, the Applicant will hold attributable interest in four FM stations (WMXO, WOBF, WPIG and WQRS) and two AM stations (WOEN and WOLY) in the market.

Pursuant to Section 73.3555(a)(1)(iii) of the FCC Rules, the applicant is permitted to own six radio stations (four in the same service) provided the market contains at least fifteen stations. Because the Geographic Market contains 28 stations, the proposed station acquisitions result in a combination of stations which satisfy the multiple ownership criteria set forth in Section 73.3555 of the FCC Rules.

Multiple Ownership Contour-Defined Market Analysis

As shown in Exhibit C, the worst-case common area of city-grade contour overlap between attributable stations and proposed acquisitions involves at most 4 FM stations and 2 AM stations. There are a number of unique areas where the principal community contours of the subject stations and the attributable stations in the same service overlap to form hypothetical radio markets of varying size. However, because of the similarity in the geometry of the hypothetical radio markets created by the various overlapping contours, a detailed station count is only necessary in the worst-case (4 FM/2 AM) market detailed herein in order to demonstrate that the proposed combination of stations complies with Section 73.3555 of the FCC Rules.

Exhibit D depicts the six-station radio market as defined by the total principal community contour area of WGMM(FM), WENI-FM, WENI(AM), WENY(AM), WCBF(FM) and WNKI(FM) (i.e. the "Subject Stations") and the principal community contours for the other stations, in which the Applicant holds no attributable interest, which are counted in the worst-case contour-defined radio

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market. Table 1 contains each station's call sign, city of license, state, channel of operation, and technical facilities.

As stated above, the applicant will own or control 4 FM stations and 2 AM stations in worst-case contour-defined radio market. Pursuant to Section 73.3555(a)(1)(ii) of the FCC Rules, the applicant is permitted to own six radio stations (four in the same service) provided the market contains at least 30 stations. As shown in Exhibit D, the contour-defined radio market contains at least 37 operating commercial or noncommercial radio stations [defined by the city-grade contours of the 6 subject stations and the overlapping city-grade contours of at least 31 other stations in which the applicant holds or will hold no attributable interest]. Accordingly, the proposed station acquisitions result in a combination of stations which satisfies the multiple ownership criteria set forth in Section 73.3555 of the FCC Rules.

This statement and the supporting Exhibits and Table were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: January 27, 2021

  
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William J. Getz

# Attributable Stations City-Grade Coverage Contours

FM Stations: 3.16 mV/m (70 dBu) Contour F(50,50)  
AM Stations: 5.0 mV/m Daytime Groundwave Contour

Exhibit A

January, 2021

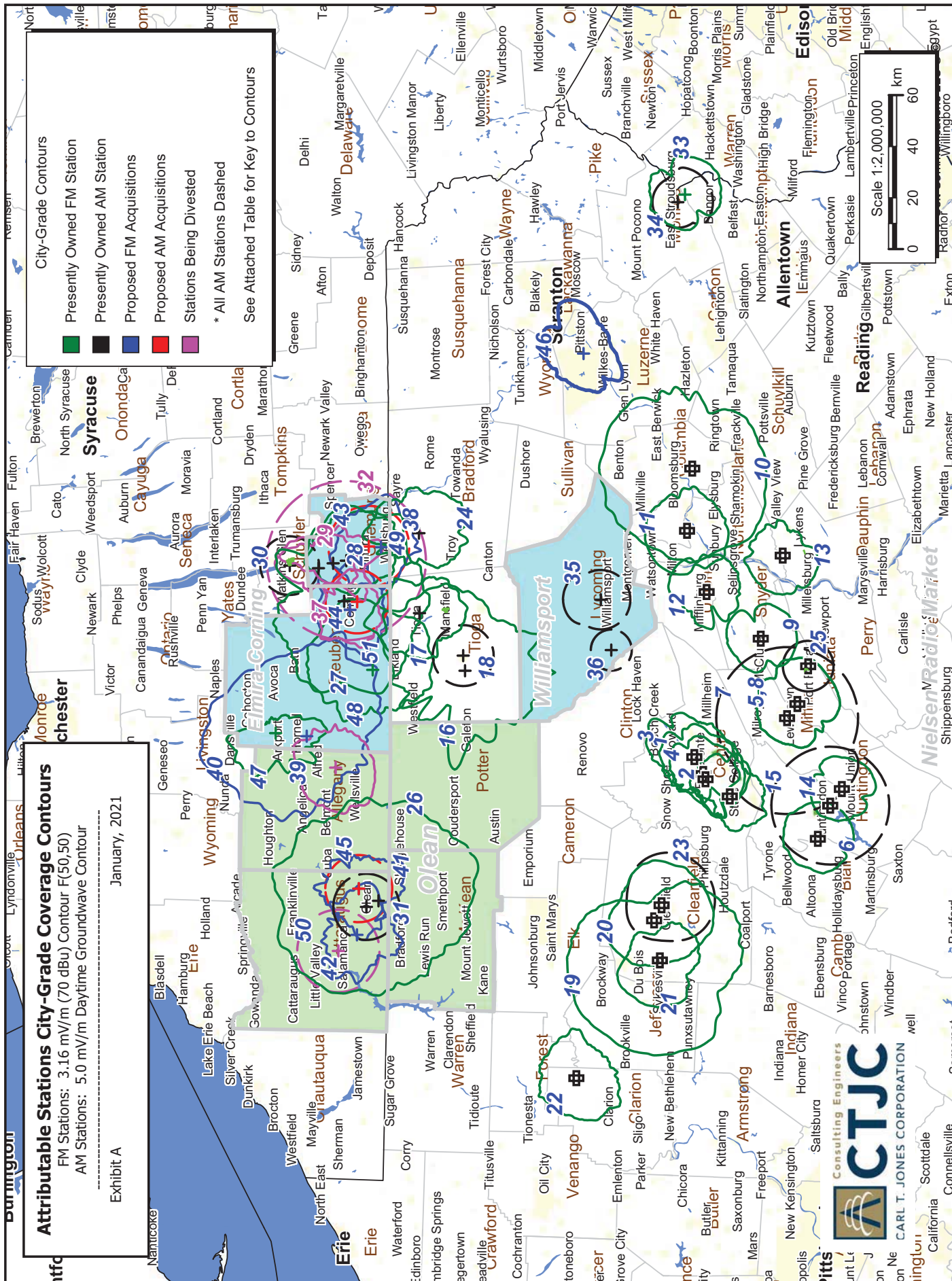
- City-Grade Contours
- Presently Owned FM Station
- Presently Owned AM Station
- Proposed FM Acquisitions
- Proposed AM Acquisitions
- Stations Being Divested
- \* All AM Stations Dashed

See Attached Table for Key to Contours



CARL T. JONES CORPORATION

Scale 1:2,000,000















-  Presently Owned FM Station
-  Presently Owned AM Station
-  Proposed FM Acquisitions
-  Proposed AM Acquisitions
-  Stations Being Divested

## Attributable Stations

### Key to Exhibit A

January, 2021

-  1 - WBHV-FM, State College, PA (233)
-  2 - WOWY(FM), University Park, PA (246)
-  3 - WLEJ(FM), Pleasant Gap, PA (254)
-  4 - WZWW(FM), Bellefonte, PA (237)
-  5 - WMRF-FM, Lewistown, PA (223)
-  6 - WHUN-FM, Huntingdon, PA (278)
-  7 - WLUI(AM), Lewistown, PA
-  8 - WIBF(FM), Mexico, PA (223)
-  9 - WNNA(FM), Beaver Springs, PA (291)
-  10 - WCFT-FM, Bloomsburg, PA (293)
-  11 - WHNA(FM), Riverside, PA (222)
-  12- WRBG(FM), Mifflinburg, PA (252)
-  13- WQBG(FM), Elizabethville, PA (263)
-  14 - WDBF-FM, Mount Union, PA (292)
-  15 - WHUN(AM), Huntingdon, PA
-  16 - WNBT-FM, Wellsboro, PA (283)
-  17 - WOGA(FM), Mansfield, PA (222)
-  18 - WNDA(AM), Wellsboro, PA
-  19 - WIFT(FM), DuBois, PA (271)
-  20 - WPQP(FM), Clearfield, PA (226)
-  21 - WQQP(FM), Sykesville, PA (240)
-  22 - WKFT(FM), Strattanville, PA (267)
-  23 - WCPA(AM), Clearfield, PA
-  24 - WZBF(FM), Ridgebury, PA (245)
-  25 - WJUN(AM), Mexico, PA

-  26 - WPIG(FM), Olean, NY (239)
-  27 - WNKI(FM), Corning, NY (291)
-  28 - WPHD(FM), Montour Falls, NY (285)
-  29 - WMTT(FM), Horseheads, NY (265)
-  30 - WNGZ(AM), Watkins Glen, NY
-  31 - WOLY(AM), Olean, NY
-  32 - WMTT(AM), Horseheads, NY
-  33 - WSBG(FM), Stroudsburg, PA (228)
-  34- WVPO(AM), Stroudsburg, PA
-  35 - WLYC(AM), Williamsport, PA
-  36 - WEJS(AM), Jersey Shore, PA
-  37 - WENY-FM, Big Flats, NY (249)
-  38 - WENI-FM, South Waverly, PA (224)
-  39 - WZKZ(FM), Alfred, NY (270)
-  40 - WKPQ(FM), Hornell, NY (287)
-  41 - WMXO(FM), Olean, NY (268)
-  42 - WQRS(FM), Salamanca, NY (252)
-  43 - WENY(AM), Elmira, NY
-  44 - WENI(AM), Corning, NY
-  45 - WOEN(AM), Olean, NY
-  46 - WCIG(FM), Dallas, PA (299)
-  47 - WOBF(FM), Canaseraga, NY (246)
-  48 - WQBF(FM), Tioga, PA (234)
-  49 - WCBF(FM), Elmira, NY (241)
-  50 - WGGO(AM), Salamanca, NY
-  51 - WGMM(FM), Corning, NY (254)