

Technical Statement

Attachment to FCC Minor Modification Application for WQSL(FM)

RADIO MULTIPLE OWNERSHIP STUDY

**WQSL(FM) Jacksonville, NC - Facility ID 28171
Dick Broadcasting Company, Inc. of Tennessee**

Prepared by
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APRIL 8, 2021

Technical Statement
RADIO MULTIPLE OWNERSHIP STUDY
prepared for
Dick Broadcasting Company, Inc. of Tennessee

Introduction

Dick Broadcasting Company, Inc. of Tennessee (“*Dick Broadcasting*”) presently has attributable ownership interest in eleven (11) radio stations in the states of North and South Carolina. *Dick Broadcasting* is proposing to modify WQSL(FM) and WXQR-FM to change site location, share the same site, and increase antenna height above average terrain. A change in class and power is also being sought for WQSL(FM). *Dick Broadcasting* herewith submits its Technical Statement in support of its continued compliance with Section 73.3555 of the Commission’s rules with regard to ownership of multiple radio stations, considering the changes in proposed coverage of WQSL(FM) and WXQR-FM being proposed. The instant Engineering Statement has been prepared using information provided by *Dick Broadcasting* and its representatives. *Dick Broadcasting*’s holdings include the following stations in North and South Carolina:

WRNS(AM) Kinston, NC Fac. Id: 36944
WWHK(AM) Myrtle Beach, SC Fac. Id: 24775
WERO(FM) Washington, NC Fac. Id: 64609
WKRR(FM) Asheboro, NC Fac. Id: 16892
WKZL(FM) Winston - Salem, NC Fac. Id: 16891
WKZQ-FM Forestbrook, SC Fac. Id: 13890
WMYB(FM) Myrtle Beach, SC Fac. Id: 27265

WQSL(FM) Jacksonville, NC Fac. Id: 28171
WQZL(FM) Belhaven, NC Fac. Id: 47883
WRNN-FM Socastee, SC Fac. Id: 53949
WRNS-FM Kinston, NC Fac. Id: 36950
WXQR-FM Jacksonville, NC Fac. Id: 28172
WYAV(FM) Myrtle Beach, SC Fac. Id: 36947

The Commission has determined, in a Report and Order and Notice of Proposed Rulemaking (“R&O”)¹, the practices applicable in the determination of various multiple ownership issues. The R&O establishes a means of evaluating radio station multiple ownership issues utilizing existing Nielsen Audio^{®2} and BIA[®] MEDIA Access Pro^{TM3} market data for analyses of markets on the basis of established industry procedures that rely on defined radio markets⁴. There is a separate “interim” means for evaluating radio station multiple ownership issues beyond established Nielsen Audio radio

¹ Report and Order in MB Docket No. 02-277 and MM Docket Nos. 01-235, 01-317, and 00-244, and Notice of Proposed Rulemaking for MB Docket 03-130 FCC-03-127, (adopted June 2, 2003) (released July 2, 2003).

² Nielsen Audio is a registered mark of Nielsen Holdings, N.V.

³ MEDIA Access Pro is a trademark of BIA[®] Financial Network Inc.

⁴ As an initial matter, the geographical boundaries of a market are established by reference to the boundaries of the markets established by Nielsen Audio. Within that market, the FCC requires that the BIA count of stations operating in the market be employed.

markets. In cases where a station is not geographically within a Nielsen Audio boundary but is declared “home” to a Nielsen Audio market, ownership concentration must be studied using both the interim and the BIA methods.

Provided as **Attachment 1** is a copy of the BIA List of Stations in the BIA defined, FCC Geographic Market Definition for Greenville-New Bern-Jacksonville, NC. Attached as **Map Figure 1** is an illustration of the principal community contours of the licensed and proposed *Dick Broadcasting* AM and FM stations listed herein. The six (6) *Dick Broadcasting* stations listed in **Attachment 1**, as part of the FCC Geographic Market of Greenville-New Bern-Jacksonville, NC, do not share any principal community contour overlap with any of the other stations in which Dick Broadcasting has attributable ownership interest.

Attachment 1 shows that a total of fifty-three (53) AM and FM radio stations are listed as being part of the Greenville-New Bern-Jacksonville, NC defined geographic radio market. With the proposed modification of WQSL(FM) and WXQR-FM, there is no change to the definition of the market and *Dick Broadcasting* will continue to be in compliance with FCC Radio Multiple Ownership rules, by owning five (5) FM and one (1) AM station in a market of 53 stations.

Pursuant to Section 73.3555 of the Commission’s Rules, the number of stations that a licensee may own or control is based on the total number of stations in that particular market, regardless of the study methodology employed. There is also a limit on how many stations each licensee may own in any one service (AM or FM) in that radio market.

- Markets with 45 or more stations are limited to 8 total stations and 5 in any one service.
- Markets with 30-44 stations are limited to 7 total stations and 4 in any one service.
- Markets with 15-29 stations are limited to 6 total stations and 4 in any one service.
- Markets with 14 or fewer stations are limited to 5 total stations and 3 in any one service, but not more than 50% of the market stations.

Methodology Summary

In preparing the attached maps and tables, pertinent station data were extracted from the Commission's engineering databases. For AM stations, these included the operating power, radiation efficiency, directional antenna data (where appropriate), and geographic coordinates. The distances to the 5 mV/m contours were then determined using the digitized version of the *Atlas of Ground Conductivity* published in 1981 by the International Telecommunication Union along with a computer

program which simulates the FCC's AM groundwave propagation curves. For the FM stations, pertinent data for determining the distances to the contour included the antenna elevation above mean sea level, geographic coordinates, effective radiated power, and, where appropriate, directional antenna patterns. The requisite 3.16 mV/m (70 dB ∞) contours were determined using digitized 3 arc-second U.S.G.S. terrain data along radials spaced every degree from the transmitter site and an implementation of the Commission's TVFMFS computer program which simulates the FM propagation curves. The detailed distances to the principal community contours were then used with a GIS mapping program to generate the attached maps.

Conclusion

As shown herein, the proposed modifications of license of WQSL(FM) and WXQR-FM do not change *Dick Broadcasting's* compliance with Section 73.3555 of the Commission's Rules regarding the multiple ownership of radio stations in a local radio market.

Certification

Under the penalty of perjury, the undersigned hereby certifies that the foregoing statement was prepared by him or under his direction on behalf of *Dick Broadcasting Company, Inc. of Tennessee* and that it is true and correct to the best of his knowledge and belief. Mark Peabody is a senior consultant in the firm of *Cavell, Mertz & Associates, Inc.* and has submitted numerous engineering exhibits to the Federal Communications Commission. His qualifications are a matter of record with the Commission.



Mark Peabody
April 8, 2021

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Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WAAE	FM	91.9	NC	ChrsContem	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	American Family Association Incorporated	New Bern, NC	Craven
WAGO	FM	88.7	NC	Christian	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Pathway Christian Academy Inc	Snow Hill, NC	Greene
WAVQ	AM	1400	C	Clsc Hits	Greenville-New Bern-Jacksonville, NC	11/26/2008	95	Curtis Media Group	Jacksonville, NC	Onslow
WBJD	FM	91.5	NC	Classical	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Craven Community College Board Trustees	Atlantic Beach, NC	Carteret
WBNK	FM	92.7	C	ChrsContem	Greenville-New Bern-Jacksonville, NC	01/01/2009	95	Educational Media Foundation	Pine Knoll Shores, NC	Carteret
WDLX	AM	930	C	Sports	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Pirate Media Group LLC	Washington, NC	Beaufort
WECU	AM	1570	C	Sprts/Talk	Greenville-New Bern-Jacksonville, NC	02/08/2006	95	CTC Media Group Inc	Winterville, NC	Pitt
WELS	FM	102.9	C	Rhymc/Olde	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Curtis Media Group	Kinston, NC	Lenoir
WERO	FM	93.3	C	CHR	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Dick Broadcasting Company Incorporated	Washington, NC	Beaufort
WGHB	AM	1250	C	Sports	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Pirate Media Group LLC	Farmville, NC	Pitt
WHAR	FM	105.1	NC	Chrst/Altve	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Educational Media Foundation	Havelock, NC	Craven
WIKS	FM	101.9	C	Urban AC	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Curtis Media Group	New Bern, NC	Craven
WJCV	AM	1290	C	Sothn Gspel	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Down East Broadcasting Co Inc	Jacksonville, NC	Onslow
WJKA	FM	90.1	NC	Chrst/Talk	Greenville-New Bern-Jacksonville, NC	06/03/2008	95	American Family Association Incorporated	Jacksonville, NC	Onslow
WJNC	AM	1240	C	Nws/Tlk/Spt	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Benfield, Ronald	Jacksonville, NC	Onslow
WKGV	FM	104.1	NC	ChrsContem	Greenville-New Bern-Jacksonville, NC	02/29/2008	95	Educational Media Foundation	Swansboro, NC	Onslow
WKNS	FM	90.3	NC	Classical	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Craven Community College Board Trustees	Kinston, NC	Lenoir
WLGP	FM	100.3	NC	Christian	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Augusta Radio Fellowship Institute	Harkers Island, NC	Carteret
WLGT	FM	98.3	C	Christian	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Benfield, Ronald	Washington, NC	Beaufort
WLNR	AM	1230	C	Mexican	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Rodriguez, Estuardo	Kinston, NC	Lenoir
WLXB	FM	98.9	NC	ChrsContem	Greenville-New Bern-Jacksonville, NC	11/08/2004	95	Educational Media Foundation	Bethel, NC	Pitt
WMGV	FM	103.3	C	AC	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Curtis Media Group	Newport, NC	Carteret
WNBB	FM	97.9	C	Country	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Coastal Carolina Radio LLC	Bayboro, NC	Pamlico
WNBU	FM	94.1	C	Oldies	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Inner Banks Media LLC	Oriental, NC	Pamlico
WNCT	AM	1070	C	Rhymc/Olde	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Curtis Media Group	Greenville, NC	Pitt
WNCT	FM	107.9	C	ClHts/Oldes	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Inner Banks Media LLC	Greenville, NC	Pitt
WNOS	AM	1450	C	News/Talk	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	CTC Media Group Inc	New Bern, NC	Craven
WNTB	FM	93.7	C	Country	Greenville-New Bern-Jacksonville, NC	05/11/2012	95	Davis Media LLC	Topsail Beach, NC	Pender
WOTJ	FM	90.7	NC	Religion	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Grace Christian School	Morehead City, NC	Carteret
WQSL	FM	92.3	C	Variety	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	p Dick Broadcasting Company Incorporated	Jacksonville, NC	Onslow
WQZL	FM	101.1	C	Variety	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Dick Broadcasting Company Incorporated	Belhaven, NC	Beaufort
WRHD	FM	94.3	C	Sports	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Inner Banks Media LLC	Farmville, NC	Pitt
WRHT	FM	96.3	C	News/Talk	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Inner Banks Media LLC	Morehead City, NC	Carteret
WRMR	FM	98.7	C	Modern	Greenville-New Bern-Jacksonville, NC	04/24/2012	95	Capitol Broadcasting Company Inc	Jacksonville, NC	Onslow

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WRNS	AM	960	C	Sports	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Dick Broadcasting Company Incorporated	Kinston, NC	Lenoir
WRNS	FM	95.1	C	Country	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Dick Broadcasting Company Incorporated	Kinston, NC	Lenoir
WSFL	FM	106.5	C	Clsc Rock	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Curtis Media Group	New Bern, NC	Craven
WSME	AM	1120	C	Old/CHt/Bch	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	B&M Broadcasting LLC	Camp Lejeune, NC	Onslow
WSRP	AM	910	C	Mexican	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Rodriguez, Estuardo	Jacksonville, NC	Onslow
WSTK	FM	104.5	C	UGspl/Inspr	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Benfield, Ronald	Aurora, NC	Beaufort
WTEB	FM	89.3	NC	Nws/Tik/Inf	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Craven Community College Board Trustees	New Bern, NC	Craven
WTIB	FM	103.7	C	News/Talk	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Inner Banks Media LLC	Williamston, NC	Martin
WTKF	FM	107.1	C	Nws/Tik/Spt	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Atlantic Ridge Telecasters Inc	Atlantic, NC	Carteret
WWMC	AM	1010	C	Gospel	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Curtis Media Group	Kinston, NC	Lenoir
WWNB	AM	1490	C	Sports	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	CTC Media Group Inc	New Bern, NC	Craven
WXBE	FM	88.3	NC	Chrst/Talk	Greenville-New Bern-Jacksonville, NC	05/16/2005	95	American Family Association Incorporated	Beaufort, NC	Carteret
WXNR	FM	99.5	C	Rhymc/CHR	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Curtis Media Group	Grifton, NC	Pitt
WXQR	FM	105.5	C	Modern	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Dick Broadcasting Company Incorporated	Jacksonville, NC	Onslow
WZGO	FM	91.1	NC	Christian	Greenville-New Bern-Jacksonville, NC	10/14/2005	95	Pathway Christian Academy Inc	Aurora, NC	Beaufort
WZMB	FM	91.3	NC	Variety	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	E Carolina University Media Board	Greenville, NC	Pitt
WZNB	FM	88.5	NC	Classical	Greenville-New Bern-Jacksonville, NC	07/02/2003	95	Craven Community College Board Trustees	New Bern, NC	Craven
WZPE	FM	90.1	NC	Classical	Greenville-New Bern-Jacksonville, NC	10/11/2004	95	Educational Information Corporation	Bath, NC	Beaufort
WZUP	FM	104.7	C	Mexican	Greenville-New Bern-Jacksonville, NC	08/01/2003	95	Benfield, Ronald	La Grange, NC	Lenoir

Number of Stations in Geographic Market 53

Previous Stations in Geographic Market

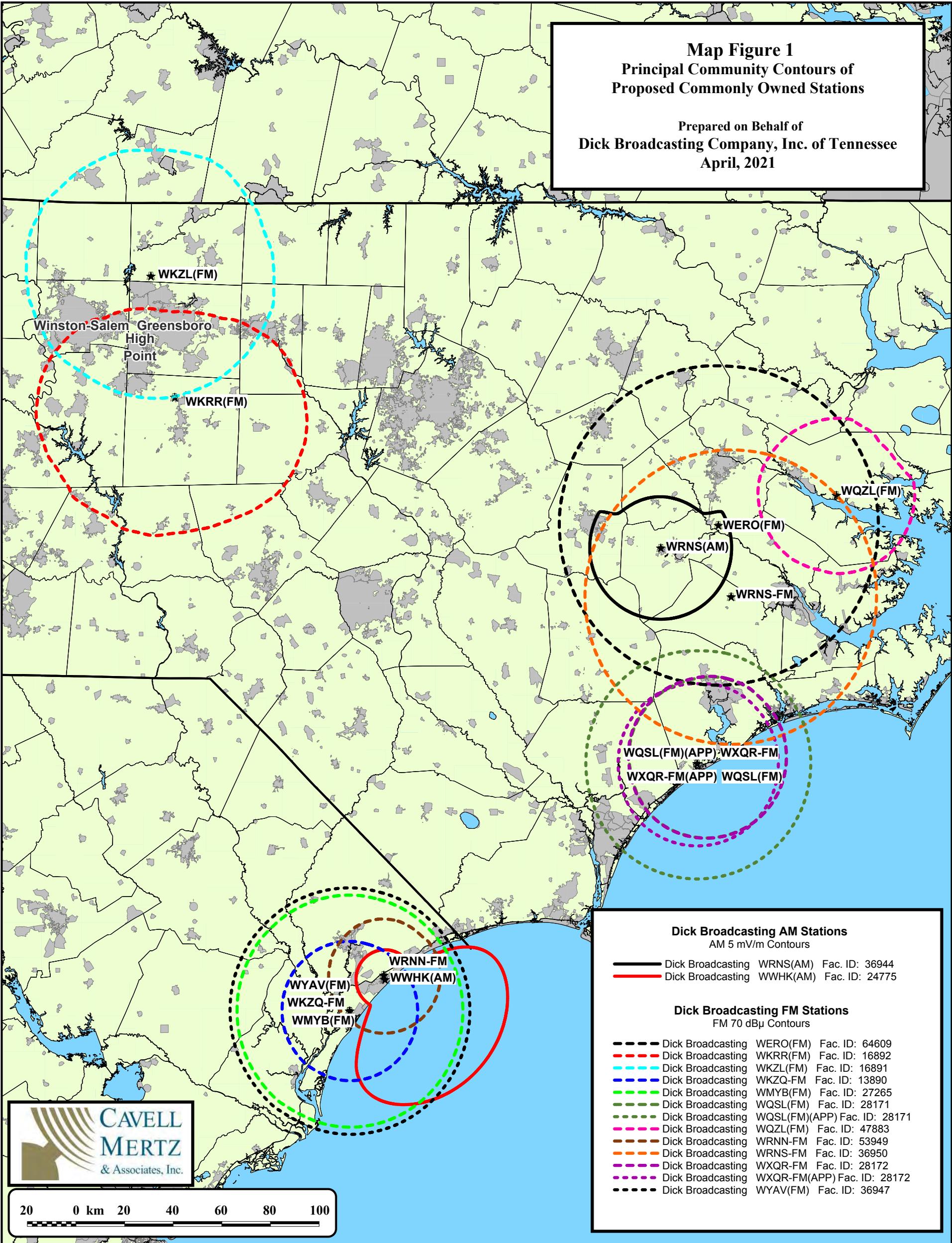
WFMC	AM	730	C	Urban Gosp		05/22/2006	0	Curtis Media Group	Goldsboro, NC	Wayne
WRSV	FM	92.1	C	Urban	Raleigh-Durham, NC	06/03/2016	37	Northstar Broadcasting Corporation	Elm City, NC	Wilson
WZKT	FM	97.7	C	Country		04/09/2008	0	Curtis Media Group	Walnut Creek, NC	Wayne

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

Map Figure 1
Principal Community Contours of
Proposed Commonly Owned Stations

Prepared on Behalf of
Dick Broadcasting Company, Inc. of Tennessee
 April, 2021



Dick Broadcasting AM Stations
 AM 5 mV/m Contours

- Dick Broadcasting WRNS(AM) Fac. ID: 36944
- Dick Broadcasting WWHK(AM) Fac. ID: 24775

Dick Broadcasting FM Stations
 FM 70 dB μ Contours

- Dick Broadcasting WERO(FM) Fac. ID: 64609
- Dick Broadcasting WKRR(FM) Fac. ID: 16892
- Dick Broadcasting WKZL(FM) Fac. ID: 16891
- Dick Broadcasting WKZQ-FM Fac. ID: 13890
- Dick Broadcasting WMYB(FM) Fac. ID: 27265
- Dick Broadcasting WQSL(FM) Fac. ID: 28171
- Dick Broadcasting WQSL(FM)(APP) Fac. ID: 28171
- Dick Broadcasting WQZL(FM) Fac. ID: 47883
- Dick Broadcasting WRNN-FM Fac. ID: 53949
- Dick Broadcasting WRNS-FM Fac. ID: 36950
- Dick Broadcasting WXQR-FM Fac. ID: 28172
- Dick Broadcasting WXQR-FM(APP) Fac. ID: 28172
- Dick Broadcasting WYAV(FM) Fac. ID: 36947

