

**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  
Mark Peabody  
**CAVELL, MERTZ & ASSOCIATES, INC.**  
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”)<sup>1</sup>, 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<sup>®2</sup> and BIA<sup>®</sup> MEDIA Access Pro<sup>TM3</sup> market data for analyses of markets on the basis of established industry procedures that rely on defined radio markets<sup>4</sup>. There is a separate “interim” means for evaluating radio station multiple ownership issues beyond established Nielsen Audio radio

---

<sup>1</sup> 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).

<sup>2</sup> Nielsen Audio is a registered mark of Nielsen Holdings, N.V.

<sup>3</sup> MEDIA Access Pro is a trademark of BIA<sup>®</sup> Financial Network Inc.

<sup>4</sup> 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 $\mu$ ) 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

Cavell, Mertz & Associates, Inc.  
7724 Donegan Dr.  
Manassas, Virginia 20109  
(703) 392-9090

| 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          |
| WGHF         | 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            |
| WKGTV        | 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            | CIHts/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/Insp  | Greenville-New Bern-Jacksonville, NC | 07/02/2003           | 95            | Benfield, Ronald                         | Aurora, NC              | Beaufort          |
| WTEB         | FM    | 89.3  | NC           | Nws/Tlk/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/Tlk/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  |

# Map Figure 1

## Principal Community Contours of Proposed Commonly Owned Stations

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

