

## Multiple Ownership

WKTR(AM) is neither “home” to nor geographically located within a Nielsen Audio Metro. Accordingly, compliance with Section 73.3555 is determined by reference to the attached contour-overlap study (the “Study”). *In Re 2002 Biennial Regul. Rev.-Rev. of the Commission’s Broad. Ownership Rules & Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, Report and Order, 18 FCC Rcd 13620, 13717–30 (2003).

As demonstrated in the attached Study, for purposes of Section 73.3555 analysis the proposed assignee and its attributable parties have cognizable interests in the following one commercial full-power FM station and one commercial full-power AM station.<sup>1</sup> Those two stations are in turn divided across two distinct markets, *see id.* at 13717 (“[S]eparate radio markets will be formed from the mutual contour overlaps of different subsets of commonly owned radio stations.”):

Call Sign	Market	Location	Facility ID No.
WVCV(AM)	Distinct Market #1	Orange, VA	54873
WOJL(FM)	Distinct Market #2	Louisa, VA	41899

As further demonstrated in the attached Study, Market #1 is home to at least 15 radio stations. Accordingly, the proposed combination of two AM stations—WKTR(AM) and WVCV(AM)—complies with the Section 73.3555 provisions applicable to radio markets between 15 and 29 full-power, commercial and noncommercial radio stations, which permits “not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM) . . . .” *See also* 47 C.F.R. § 73.3555(a)(1)(iv) (permitting in even the smallest markets the common ownership of “not more than 3 commercial stations in the same service” as long as combination does not constitute “more than 50% of the full-power, commercial and noncommercial radio stations in such market . . . .”). In the case of Market #2, the combination of WKTR(AM) and WOJL(FM) is permissible under Section 73.3555(a)(2), which permits “[o]verlap between two stations in different services . . . if neither of those two stations overlaps a third station in the same service.”

Accordingly, the proposed assignment of WKTR(AM) complies with the Commission’s multiple ownership rules.

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<sup>1</sup> The proposed assignee and its attributable parties also have cognizable interests in stations WJMA(FM), Culpeper, VA, Facility ID No. 14710, and WCVA(AM), Culpeper, VA, Facility ID No. 14711. However, WKTR(AM)’s principal community contour does not overlap either of those two stations such that neither WJMA(FM) nor WCVA(AM) count as “numerator” stations for purpose of Section 73.3555 analysis. *See id.* at 13717. The attached Study was performed with full knowledge of that circumstance, and therefore does not include WCVA(AM) or WJMA(FM).

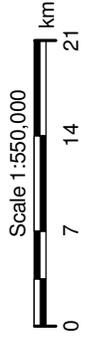
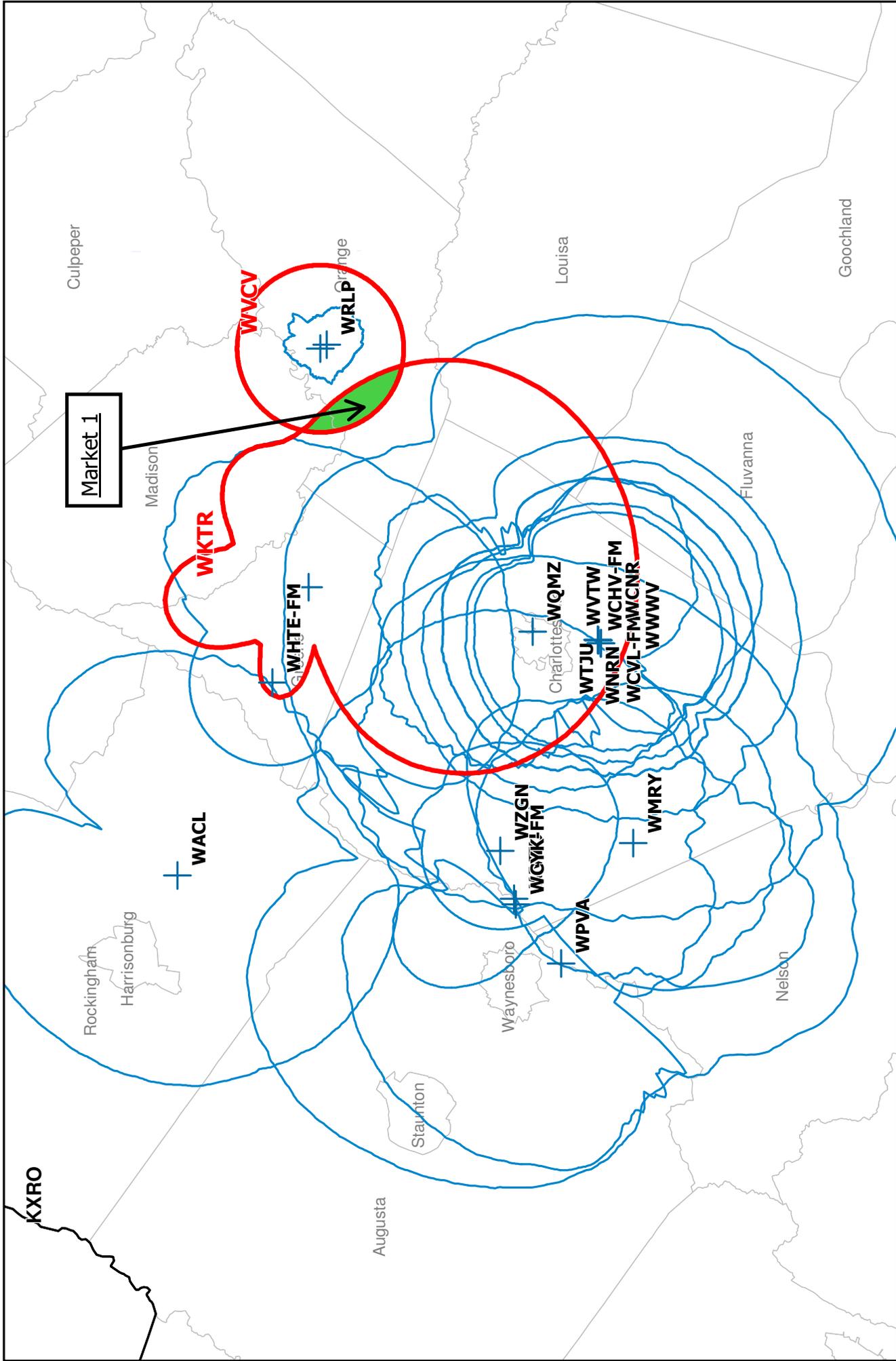
**CONTOUR BASED OWNERSHIP STUDY**

**This technical report is provided to demonstrate FCC local radio ownership rule compliance for the aural broadcast market formed by the proposed transfer of control of the radio station currently licensed to CSN International (WKTR) and Piedmont Communications, Inc. (“Piedmont”). This report by Laramie Guest of Guest Technology, LLC illustrates the requisite contour analysis to define the markets created by these stations, and demonstrates that the proposed transfer would fully comply with Section 73.3555(a) of the Commission’s rules.**

<b>Station</b>	<b>Facility ID</b>	<b>City of License</b>
WKTR(AM)	73191	Earlysville, VA
WVCV(AM)	54873	Orange, VA
WOJL(FM)	41899	Louisa, VA

**Stations WKTR(AM), WVCV(AM) and WOJL(FM) are neither “home” to nor geographically located within a Nielsen metro. These three stations will therefore be the subject of this contour based ownership study. In Market 1, which is composed of more than 18 radio stations, the licensee will own 2 AMs, allowing common ownership of 5 stations, no more than 3 of which may be in the same service & not more than 50% in the market. In Market 2, the licensee will own 1 AM and 1 FM. Accordingly, under the limits set forth in §73.3555 the acquisition is in full compliance with the Commission’s ownership rules.**

<b>Defined Markets</b>	<b>FM Stations</b>	<b>AM Station</b>
<b>Market 1</b>		<b>WKTR, WVCV</b>
<b>Market 2</b>	<b>WOJL</b>	<b>WKTR</b>



Piedmont Communications, Inc.  
 Non-Nielsen Contour Overlap Market Analysis



## Piedmont Local Radio Ownership Station List

### Market 1

Total number of overlapping contours: 18

**Reference:**

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WKTR	AM	840	EARLYSVILLE	VA	BML20151014AEW	0.0	0.0
WVCV	AM	1340	ORANGE	VA	BL14490	25.8	92.9

**Overlapping Contours:**

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WVTW	FM	203B1	Charlottesville	VA	BLED20120327ALP	32.1	191.0
WRLP	FM	206A	Orange	VA	BLED20140805ACJ	26.2	94.3
WVTU	FM	207B1	Charlottesville	VA	BLED19901212KA	40.3	236.7
WPVA	FM	211B1	Waynesboro	VA	BLED20150409AAR	48.9	236.2
WTJU	FM	216B1	Charlottesville	VA	BLED20121120AAA	32.1	191.0
WNRN	FM	220A	Charlottesville	VA	BLED19970121KB	32.1	191.0
WCVL-FM	FM	224A	Charlottesville	VA	BLH20170418AAK	31.7	190.4
WQMZ	FM	236A	Charlottesville	VA	BLH20000120AAT	24.6	191.4
WWWV	FM	248B	Charlottesville	VA	BMLH19980925KA	31.7	190.5
WACL	FM	253B1	Elkton	VA	BLH19890315KB	34.2	294.6
WCYK-FM	FM	259B	Staunton	VA	BLH19891222KD	40.9	236.9
WHITE-FM	FM	270A	Ruckersville	VA	BLH19930607KB	11.0	291.0
WZGN	FM	272A	Crozet	VA	BLH19900816KC	35.2	234.1
WMRY	FM	278A	Crozet	VA	BLED19950524KC	44.6	218.4
WCNR	FM	291A	Keswick	VA	BMLH20170407AAB	31.7	190.4
WCHV-FM	FM	298A	Charlottesville	VA	BLH19960112KD	31.7	190.5

Distance and bearing calculations from coordinates: 38-15-57.47 N, 078-24-52.03 W

**Duopoly Options:**

FM: 3.16 mV/m (70 dBu); Include NCE

AM: Not Included

Stations more than 92 km from the common area were excluded.

**Note:** This is not a complete listing of all other stations in the market, but rather enough stations to show compliance with the Commission's ownership rules.

**Statement of the Consultant**

**The information in this study is compiled from the most recent Commission and outside data. Guest Technology is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.**

**I personally prepared the foregoing exhibits. I certify to the best of my knowledge, education, and belief the above information is true and correct.**

**For Guest Technology, LLC.**

A handwritten signature in black ink that reads "Laramie Guest". The signature is written in a cursive style and is positioned above a horizontal line. Below the line, the name "Laramie Guest" is printed in a simple, black, sans-serif font.

Laramie Guest

**6/24/2022**

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