

## **Section 73.3555(a)(1)(iii) - Multiple Ownership Exhibit**

### **Radio Market Analysis East Tennessee Radio Group, III LP WQMT – Channel 230A (93.9 MHz) – Hopewell, TN**

**September 2, 2022**

This statement and attached exhibits were prepared on behalf of East Tennessee Radio Group III, L.P. (“ETRG III”). ETRG III is the licensee of WBAC(AM), 1340 kHz, Facility ID No. 66955, Cleveland, Tennessee and WQMT, Channel 230A, Facility ID No. 70782, Hopewell, Tennessee. ETRG III is filing a minor modification application to change transmit location of WQMT and proposes to operate on Channel 230A and as such a Radio Market analysis is needed. WQMT is not located in any Nielsen Audio metro county and is not listed as home to any Nielsen rated market. Therefore, an interim contour based overlap study for stations not licensed to metro counties is necessary.

#### **Contour Based Overlap Analysis**

Parties with an attributable interest in ETRG III also have an attributable interest in North Georgia Radio Group, L.P. (“NGRG”). NGRG is the licensee of WYYU, Channel 283A, Facility ID No. 54517, Dalton, GA (with pending FCC construction permit for Channel 283C3), WBLJ(AM) 1230 kHz, Facility ID No. 49233, Dalton, GA, WDAL(AM), 1430 kHz, Facility ID No. 54518, Dalton, GA and WOCE, Channel 270A, Facility ID No. 4059, Ringgold, GA.

Parties with an attributable interest in ETRG III also have an attributable interest in East Tennessee Radio Group, L.P. (“ETRG”). ETRG is the licensee of WSEV-FM, Channel 288A, Facility ID No. 17059, Gatlinburg, Tennessee and WPFT, Channel 292A, Facility ID No. 170936, Pigeon Forge, Tennessee.

Exhibit One is a map showing the principal city grade contours of all stations owned by ETRG III and NGRG. No ETRG stations are shown on the map. All ETRG stations are more than 92 km. from WQMT and the ETRG III Market Boundary. Note there is no overlap of the principal

community contours of NGRC stations with ETRG III stations.

Because WQMT is licensed to a non-metro county, a contour overlap analysis has been conducted for ownership compliance. The analysis has determined that two Defined Radio Markets are created by the proposed WQMT modification. Map One shows the principal community contours of all of the stations owned by ETRG III and NGRG. WOCE, Channel 270A, Ringold, GA overlaps principal community contours with the proposed WQMT modification.

### **Defined Radio Market No. 1**

The combined city grade contours of WBAC(AM) and the proposed WQMT modification are being used to determine the number of other stations in the Defined Radio Market. No stations with transmitters more than 92 km from the boundary of the common overlap of subject stations will be considered. Further, no other facility of which the principle shareholders of ETRG III have an attributable interest will be considered as a market contributor unless it is a subject station in the radio market under study.

Map Two shows the city grade contours of the two stations that create Defined Radio Market No. 1. Map Three shows the Defined Radio Market boundary along with all the AM and FM stations with overlapping contours with Defined Radio Market. Table One – Table of Stations Shown has a total of 22 full power AM and FM stations. One station, WOCE overlaps contours with WQMT but not WBAC. Therefore, WOCE is a non-contributing station and will not be counted in the market station total. There are a total of 21 stations in Defined Radio Market No. 1. The number of stations in the Defined Radio Market depicted falls in the 15 to 29 stations level. Therefore, common ownership or control of up to six full power stations with no more

than four in the same band is permissible. ETRG III would own or have interest in one FM station and one AM station in Defined Radio Market No. 1

### **Defined Radio Market No. 2**

The combined city grade contours of the proposed WQMT modification and WOCE are being used to determine the number of other stations in Defined Radio Market No.2. No stations with transmitters more than 92 km from the boundary of the common overlap of subject stations will be considered. Further, no other facility of which the principle shareholders of ETRG III have an attributable interest will be considered as a market contributor unless it is a subject station in the radio market under study.

Map Four shows the city grade contours of the two stations that create Defined Radio Market No. 2. Map Five shows the Defined Radio Market boundary along with all the AM and FM stations with overlapping contours with Defined Radio Market. Table Two – Table of Stations Shown has a total of 40 full power AM and FM stations. There are a total of four non-contributing subject stations that will not be counted in the market station total. The non-contributing stations are WBAC(AM), WDAL(AM), WBLJ(AM) and WYYU(FM). Therefore, there are a total of 36 full power AM and FM stations in Defined Radio Market No. 2.

The number of stations in the Defined Radio Market depicted falls in the 30 to 44 stations level. Therefore, common ownership or control of up to seven full power stations with no more than four in the same band is permissible. ETRG III would own or have interest in two FM stations in Defined Radio Market No. 2. Based on the review of Defined Radio Markets No. 1 and No.2, it is believed that this minor change application for WQMT is in compliance with

§73.3555(a)(1)(iii) of the Commission's rules.

The foregoing technical statement was prepared on behalf of ETRG III by Donald Lynch of Horizon Broadcast Solutions, LLC, its Technical Consultant. Any information contained herein is true and accurate to the best of my belief and knowledge. All data relating to AM and FM facilities was extracted from the LMS database. We assume no liability for errors or omissions in that database or program which may be adverse to the information contained herein.

**WQMT Appl.**

Hopewell, TN  
Latitude: 35-09-54 N  
Longitude: 084-51-13 W  
ERP: 3.50 kW  
HAAT: 132.93 m  
Channel: 230  
Frequency: 93.9 MHz

**WBAC**

Cleveland, TN  
BL13275  
Latitude: 35-09-54 N  
Longitude: 084-51-13 W  
Frequency: 1340 kHz  
Power: 1.0 kHz Day

**WOCE**

Ringgold, GA  
BLH19950525KA  
Latitude: 34-58-11.20 N  
Longitude: 085-05-09.80 W  
ERP: 1.30 kW  
HAAT: 214.0  
Channel: 270  
Frequency: 101.9 MHz

**WDAL.C**

Dalton, GA  
Latitude: 34-45-22.3 N  
Longitude: 84-57-03.5 W  
Frequency: 1430 kHz  
Power: 2.1 kHz Day

**WBLJ**

Dalton, GA  
Latitude: 34-45-23 N  
Longitude: 84-57-02 W  
Frequency: 1230 kHz  
Power: 1.0 kHz Day

**WYYU.C**

Dalton, GA  
Latitude: 34-49-42 N  
Longitude: 084-53-41 W  
ERP: 13.50 kW  
HAAT: 87.0  
Channel: 283  
Frequency: 104.5 MHz

**Map One - Section 73.3555(a) Multiple Ownership**

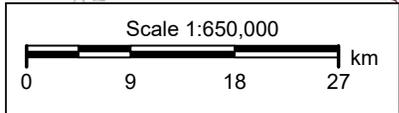
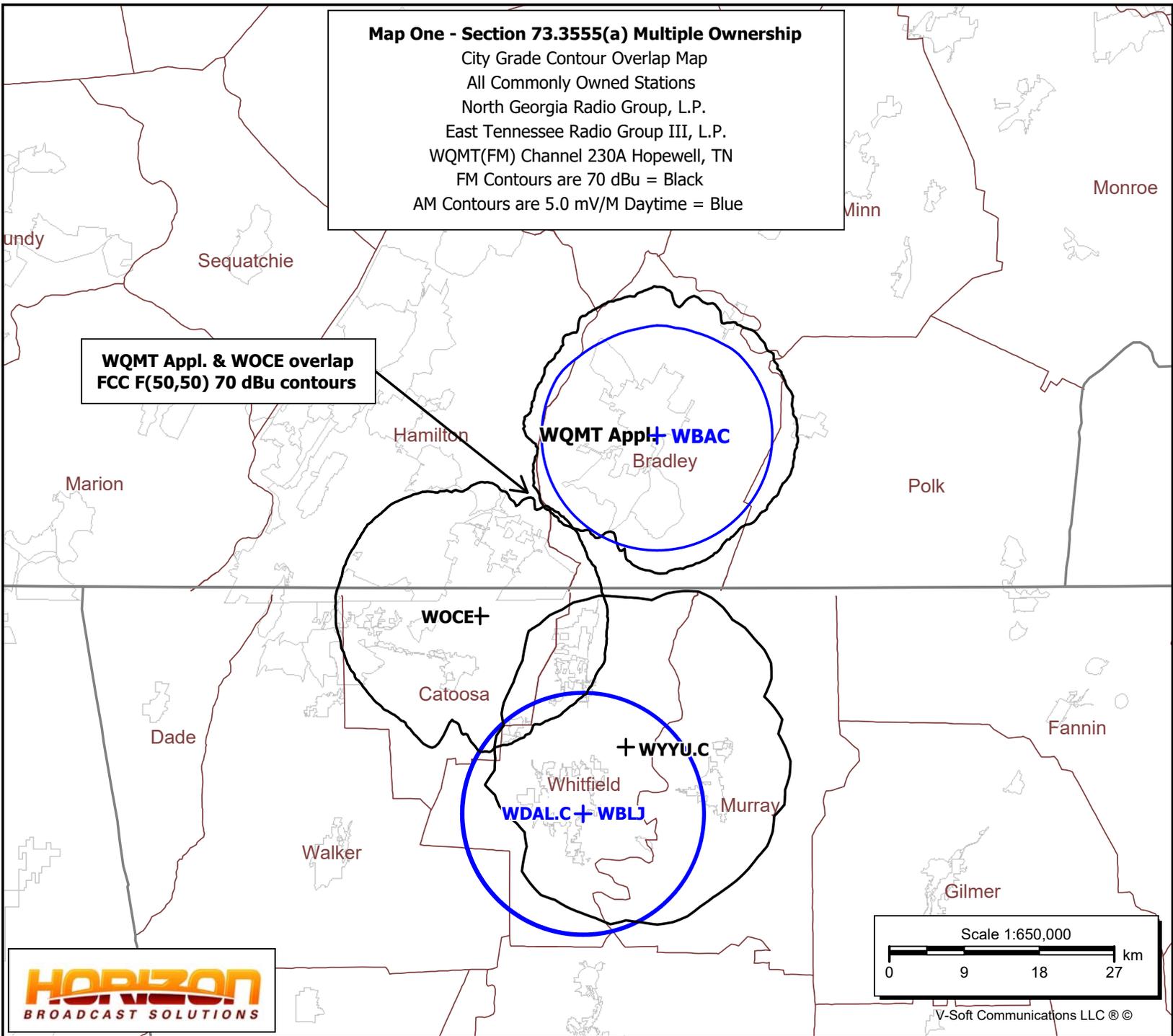
City Grade Contour Overlap Map  
All Commonly Owned Stations  
North Georgia Radio Group, L.P.  
East Tennessee Radio Group III, L.P.  
WQMT(FM) Channel 230A Hopewell, TN  
FM Contours are 70 dBu = Black  
AM Contours are 5.0 mV/M Daytime = Blue

**WQMT Appl. & WOCE overlap  
FCC F(50,50) 70 dBu contours**

**WQMT Appl. + WBAC**

**WOCE +**

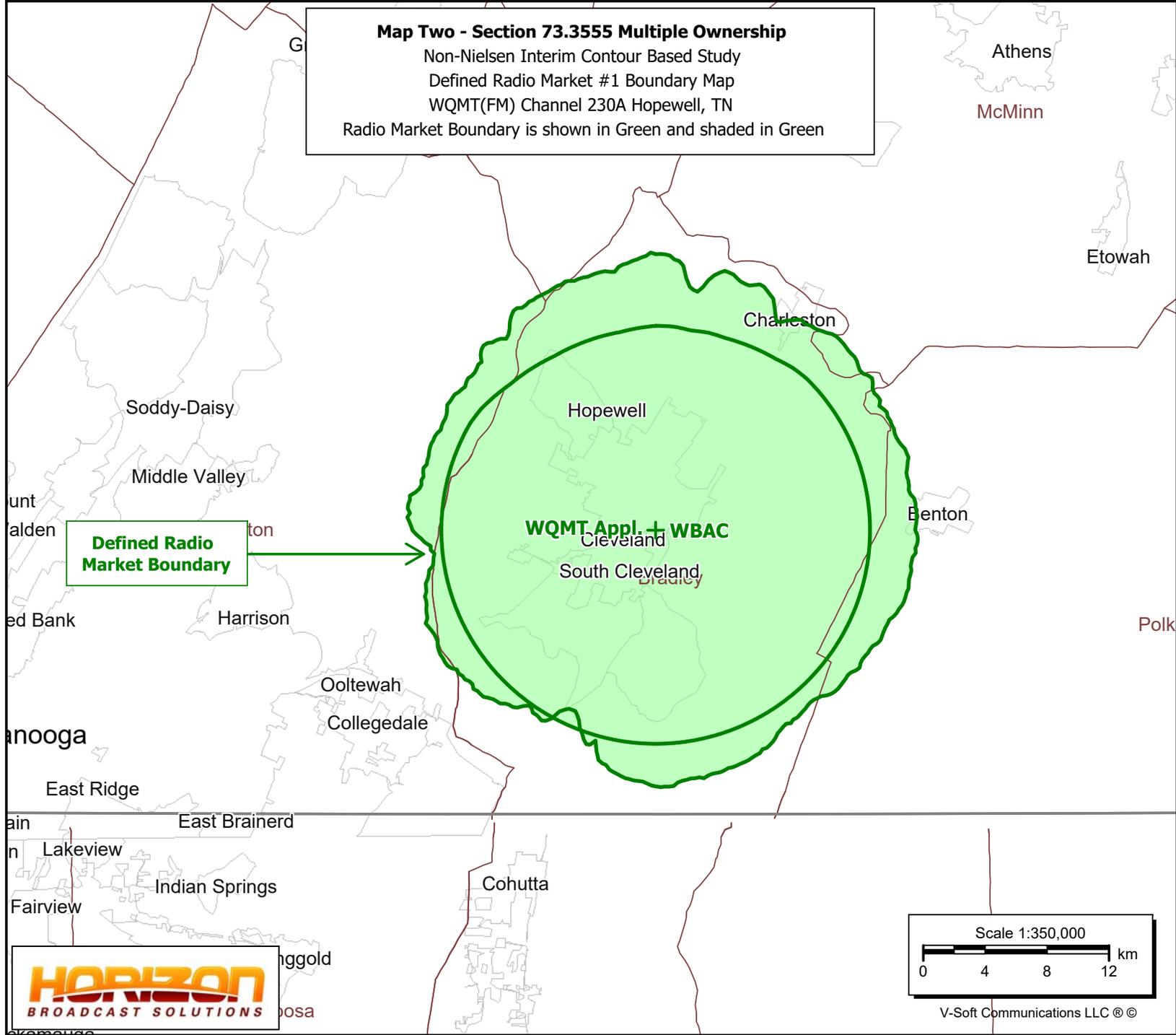
**+ WYYU.C**  
**WDAL.C + WBLJ**



**WQMT Appl.**  
Hopewell, TN  
Latitude: 35-09-54 N  
Longitude: 084-51-13 W  
ERP: 3.50 kW  
HAAT: 132.93 m  
Channel: 230  
Frequency: 93.9 MHz  
AMSL Height: 390.15 m  
Elevation: 295.6 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: None

**WBAC**  
Cleveland, TN  
BL13275  
Latitude: 35-09-54 N  
Longitude: 084-51-13 W  
Frequency: 1340 kHz  
Power: 1.0 kHz Day

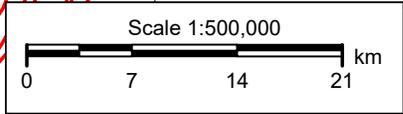
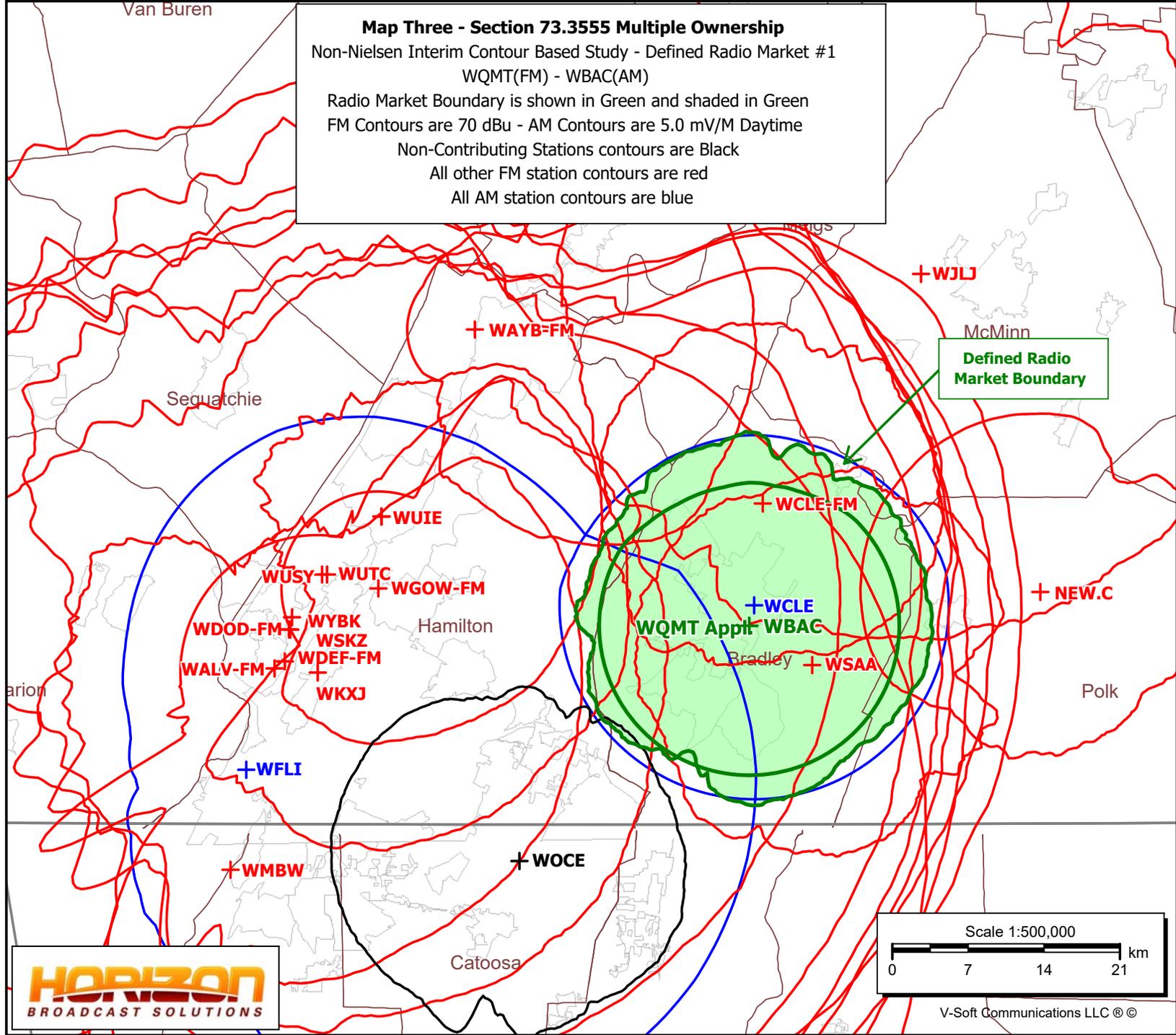
**Map Two - Section 73.3555 Multiple Ownership**  
Non-Nielsen Interim Contour Based Study  
Defined Radio Market #1 Boundary Map  
WQMT(FM) Channel 230A Hopewell, TN  
Radio Market Boundary is shown in Green and shaded in Green



**WQMT Appl.**  
 Hopewell, TN  
 Latitude: 35-09-54 N  
 Longitude: 084-51-13 W  
 ERP: 3.50 kW  
 HAAT: 132.93 m  
 Channel: 230  
 Frequency: 93.9 MHz  
 AMSL Height: 390.15 m  
 Elevation: 295.6 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model: None

**WBAC**  
 Cleveland, TN  
 BL13275  
 Latitude: 35-09-54 N  
 Longitude: 084-51-13 W  
 Frequency: 1340 kHz  
 Power: 1.0 kHz Day

**Map Three - Section 73.3555 Multiple Ownership**  
 Non-Nielsen Interim Contour Based Study - Defined Radio Market #1  
 WQMT(FM) - WBAC(AM)  
 Radio Market Boundary is shown in Green and shaded in Green  
 FM Contours are 70 dBu - AM Contours are 5.0 mV/M Daytime  
 Non-Contributing Stations contours are Black  
 All other FM station contours are red  
 All AM station contours are blue



**Table One - Table of Stations Shown**

**Total number of overlapping contours: 22**  
**Total stations in Defined Market #1: 21**  
**Total number of non-contributing subject stations: 1**

**Reference Stations: RADIO MARKET #1 - Combined Contours of the following stations**

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WQMT Appl.	FM	230A	Hopewell	TN		0.0	0.0
WBAC	AM	1340	Cleveland	TN	BL13275	0.0	0.0

Total Reference Stations: 2

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WUTC	FM	201C1	Chattanooga	TN	BLED19931130KA	39.2	277.0
WMBW	FM	205C	Chattanooga	TN	BMLLED20020919AAA	52.8	244.9
WYBK	FM	209C1	Chattanooga	TN	BMLLED20140602BAP	42.2	271.2
WSMC-FM	FM	213C	Collegedale	TN	BLED19940222KF	35.4	286.6
WDEF-FM	FM	222C0	Chattanooga	TN	BMLH20050831ADG	43.0	265.7
WSAA	FM	226A	Benton	TN	0000158776	6.8	122.1
WALV-FM	FM	237C3	Ooltewah	TN	BLH20090731AEV	43.9	265.0
WAYB-FM	FM	239A	Graysville	TN	BMLLED20040920ACB	37.2	317.2
WDOD-FM	FM	243C0	Chattanooga	TN	BLH20010222AAI	42.3	269.6
NEW.C	FM	250A	Delano	TN	0000159148	27.0	83.5
WUSY	FM	264C0	Cleveland	TN	BLH19890711KC	39.7	276.9
WOCE <sup>1</sup>	FM	270A	Ringgold	GA	BLH19950525KA	30.3	224.5
WGOW-FM	FM	272A	Soddy-Daisy	TN	BLH19950519KC	34.4	275.8
WJLJ	FM	276C2	Etowah	TN	BLH19890814KF	36.1	26.1
WKXJ	FM	279C3	Walden	TN	BLH20080625ACA	40.0	263.9
WCLE-FM	FM	281A	Calhoun	TN	BLH20160614ABJ	11.3	6.4
WUIE	FM	286A	Lakesite	TN	0000149575	35.4	286.6
WSKZ	FM	293C0	Chattanooga	TN	0000170787	42.4	269.6

Total Other FM stations: 17

WCLE	AM	1570	CLEVELAND	TN	BL19850318AC	1.9	13.6
WFLI	AM	1070	LOOKOUT MOUNTAIN	TN	BL19860430AG	48.2	254.1

Total Other AM stations: 2

*\*commonly owned non-subject station (not included in stations total)*

Distance and bearing calculations from coordinates: 35-09-54 N, 084-51-13 W

Duopoly Options:

TV: Not Included

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

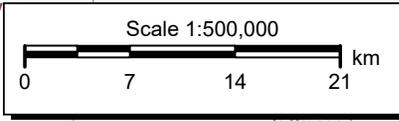
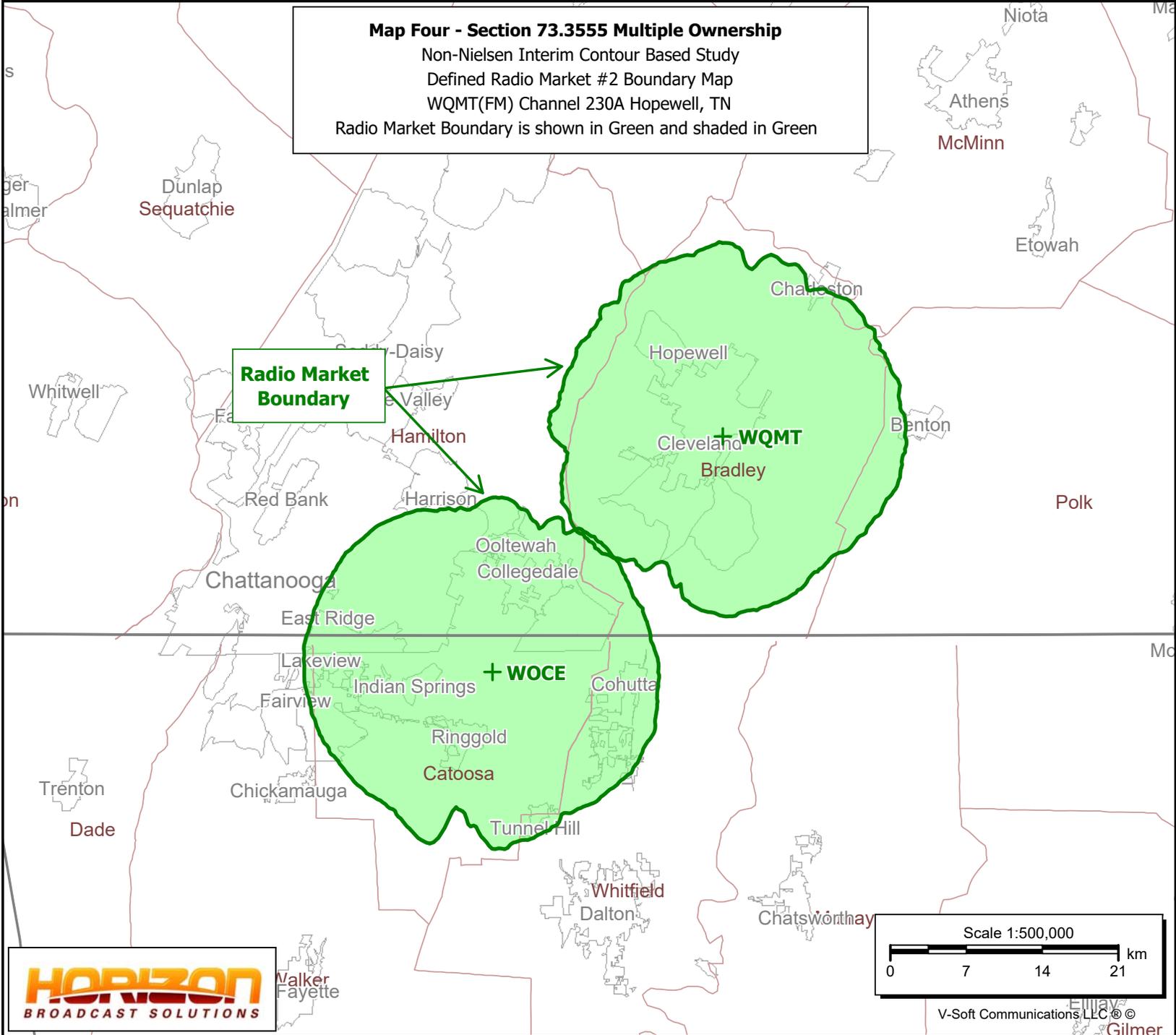
AM: 5.0 mV/m

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

**WQMT**  
 Hopewell, TN  
 Latitude: 35-09-54 N  
 Longitude: 084-51-13 W  
 ERP: 3.50 kW  
 HAAT: 132.93 m  
 Channel: 230  
 Frequency: 93.9 MHz  
 AMSL Height: 390.15 m  
 Elevation: 295.6 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model: None

**WOCE**  
 Ringgold, GA  
 BLH19950525KA  
 Latitude: 34-58-11.20 N  
 Longitude: 085-05-09.80 W  
 ERP: 1.30 kW  
 HAAT: 214.0 m  
 Channel: 270  
 Frequency: 101.9 MHz  
 AMSL Height: 469.0 m  
 Elevation: 417.0 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model: None

**Map Four - Section 73.3555 Multiple Ownership**  
 Non-Nielsen Interim Contour Based Study  
 Defined Radio Market #2 Boundary Map  
 WQMT(FM) Channel 230A Hopewell, TN  
 Radio Market Boundary is shown in Green and shaded in Green





**Table Two - Table of Stations Shown**

**Total number of overlapping contours: 40**

**Total stations in Defined Market #2: 36**

**Total number of non-contributing subject stations: 4**

**Reference Stations: RADIO MARKET #2 - Combined Contours of the following stations**

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WQMT	FM	230A	Hopewell	TN	0000198519	0.0	0.0
WOCE	FM	270A	Ringgold	GA	BLH19950525KA	30.3	224.5

**Total Subject Stations: 2**

**Overlapping Contours:**

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WUTC	FM	201C1	Chattanooga	TN	BLED19931130KA	39.2	277.0
WMBW	FM	205C	Chattanooga	TN	BMLED20020919AAA	52.8	244.9
WYBK	FM	209C1	Chattanooga	TN	BMLED20140602BAP	42.2	271.2
WSMC-FM	FM	213C	Collegedale	TN	BLED19940222KF	35.4	286.6
WJBP	FM	218C3	Red Bank	TN	BMLED20150115ABK	47.6	239.1
WDEF-FM	FM	222C0	Chattanooga	TN	BMLH20050831ADG	43.0	265.7
WSAA	FM	226A	Benton	TN	0000158776	6.8	122.1
WMPZ	FM	228A	Harrison	TN	BLH20080625ABW	40.0	263.9
WJTT	FM	232A	Red Bank	TN	BLH19980814KD	40.0	263.9
WALV-FM	FM	237C3	Ooltewah	TN	BLH20090731AEV	43.9	265.0
WAYB-FM	FM	239A	Graysville	TN	BMLED20040920ACB	37.2	317.2
WDOD-FM	FM	243C0	Chattanooga	TN	BLH20010222AAI	42.3	269.6
NEW.C	FM	250A	Delano	TN	0000159148	27.0	83.5
WLND	FM	251A	Signal Mountain	TN	BLH20080304ABR	47.2	259.7
WUSY	FM	264C0	Cleveland	TN	BLH19890711KC	39.7	276.9
WGOW-FM	FM	272A	Soddy-Daisy	TN	BLH19950519KC	34.4	275.8
WBDX	FM	274A	Trenton	GA	BLH19920911KE	59.5	236.0
WYYU.C <sup>1</sup>	FM	283C3	Dalton	GA	0000162885	37.5	185.7
WRXR-FM	FM	288A	Rossville	GA	BLH20070814AAI	46.2	240.1
WJLJ	FM	276C2	Etowah	TN	BLH19890814KF	36.1	26.1
WKXJ	FM	279C3	Walden	TN	BLH20080625ACA	40.0	263.9
WCLE-FM	FM	281A	Calhoun	TN	BLH20160614ABJ	11.3	6.4
WUIE	FM	286A	Lakesite	TN	0000149575	35.4	286.6
WSKZ	FM	293C0	Chattanooga	TN	0000170787	42.4	269.6
WOGT	FM	300C3	East Ridge	TN	BLH20050606AGP	40.0	263.9

**Total Other FM Stations: 25 (One non-contributing FM subject station)**

WDYN	AM	980	ROSSVILLE	GA	BML20120217ACC	46.4	241.5
WFLI	AM	1070	LOOKOUT MOUNTAIN	TN	BL19860430AG	48.2	254.1
WGOW	AM	1150	CHATTANOOGA	TN	BL12507	45.1	256.4
WBLJ <sup>1</sup>	AM	1230	DALTON	GA	BL8653	46.2	191.1
WNOO	AM	1260	CHATTANOOGA	TN	BML20041018ADP	40.2	252.0
WBAC <sup>1</sup>	AM	1340	CLEVELAND	TN	BL13275	0.0	0.0
WXCT	AM	1370	CHATTANOOGA	TN	BML20030716AEA	46.4	252.8
WDAL.C <sup>1</sup>	AM	1430	DALTON	GA	BP20210721AAA	46.6	191.1
WLMR	AM	1450	CHATTANOOGA	TN	BL13897	40.4	251.5
WJOC	AM	1490	CHATTANOOGA	TN	BL12827	40.3	252.0
WTTI	AM	1530	DALTON	GA	BL11037	45.5	202.6
WCLE	AM	1570	CLEVELAND	TN	BL19850318AC	1.9	13.6
WQCH	AM	1590	LAFAYETTE	GA	BML20180720AAT	62.6	217.3

**Total Other AM Stations: 13 (Three non-contributing AM subject stations)**

<sup>1</sup>Commonly owned non-subject station (not included in stations total)

Distance and bearing calculations from coordinates: 35-09-54 N, 084-51-13 W

Duopoly Options:

TV: Not Included

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

AM: 5.0 mV/m

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