

**Banner Elk, North Carolina  
Application for Minor Modification for  
FM Station WZJS  
On Channel 264  
by  
High Country Adventures, LLC**

**Compliance with §73.3555 Ownership Limits Exhibit**

**September 2022**

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Declaration

I declare, under penalty of perjury, that I am a technical consultant to broadcasting and other communications systems, that I have over twenty-five years of experience in the engineering of broadcast and other communications systems, that I am familiar with the Federal Communications Commission's Rules found in the Code of Federal Regulations Title 47, that I am a Professional Engineer registered in North Carolina, that I have prepared or supervised the preparation of the attached Compliance with §73.3555 Ownership Exhibit for High Country Adventures, LLC, and that all of the facts therein, except for facts of which the Federal Communications Commission may take official notice, are true to the best of my knowledge and belief.



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15 September 2022

### Narrative

This Exhibit supports a minor modification application for FM station WZJS, on Channel 264 in Banner Elk, North Carolina. Because this modification creates a minor change in the coverage contours of WZJS, it is necessary to show that the existing ownership continues to comply with the requirements of 47 C.F.R. §73.3555(a)(1).

The changes to WZJS. Coordinate corrections are 0.5 seconds of Latitude and 0.1 second of longitude. The correction of base elevation is an increase of 10.7 meters above mean sea level.

WZJS does not have its community of license located within the geographic boundaries of any Nielsen Audio Metro. Therefore, this review will verify compliance of commonly owned stations using the interim contour-overlap methodology.

In addition to WZJS, High Country Adventures, LLC, owns WWMY (FM), Beech Mountain, North Carolina<sup>1</sup>, WMMY (FM), Jefferson, North Carolina, WATA (AM), Boone, North Carolina, WXIT (AM), Blowing Rock, North Carolina, and WECR (AM), Newland, North Carolina.<sup>2</sup>

The city grade contours of the stations listed above are shown on Figure 1. As shown on Figure 1, the proposed minor modification of WZJS involves two Radio Markets under the interim contour-overlap methodology.

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<sup>1</sup> WWMY (FM), Beech Mountain, North Carolina is simultaneously applying for a minor modification to correct its contours. The revised contours are used in this analysis.

<sup>2</sup> In addition, the owner of High Country Adventures, LLC, also has attributable interests in other commercial full-power radio stations. However, none of those other stations have principal community contours that overlap with WZJS and are therefore not included in this review.

Market One consists of WZJS (FM), WWMY (FM), WECR (AM) and WXIT (AM). Figure 2 shows the area covered by the Market One. Figure 3 shows that market area along with the principal community contours of non-owned stations that overlap the radio market. Table 1 lists the facilities shown on Figure 3.

Market Two consist of WZJS (FM), WWMY (FM), WMMY (FM), WXIT (AM) and WATA (AM). Figure 4 shows the area covered by the Market Two. Figure 5 shows that market area along with the principal community contours of non-owned stations that overlap the radio market. Table 2 lists the facilities shown on Figure 5.

**Table 1: Stations in Radio Market One**

Total number of overlapping contours: 17

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
Mkt One						0	0
WWMYm	FM	272A	Beech Mountain	NC	Proposed	7.3	320.9
WZJSm	FM	264A	Banner Elk	NC	Proposed	7.3	320.9
WXIT	AM	1200	Blowing Rock	NC	BL20160805ABU	14.6	51.2
WECR	AM	1130	Newland	NC	BL19780720AA	10.1	231.7

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WNCW	FM	204C	Spindale	NC	143612	60.5	223.2
WASU-FM	FM	213A	Boone	NC	BLED20110803AAZ	16.1	46.7
WKBC-FM	FM	247C	North Wilkesboro	NC	BLH19970711KA	63.3	95.6
WMIT	FM	295C	Black Mountain	NC	BMLED20161027AAG	60.5	223.2
WCQR-FM	FM	202C2	Kingsport	TN	BLED19961120KB	43.2	320
WETS-FM	FM	208C	Johnson City	TN	BMLED20060802ATX	43.2	320.5
WHCB	FM	218C1	Bristol	TN	BLED19930210KD	43.2	320.6
WFHG-FM	FM	225C2	Bluff City	TN	BLH20120601ALI	48.2	288.3
WTFM	FM	253C	Kingsport	TN	BLH20190412ABM	43.1	320
WEXX	FM	257C3	Elizabethton	TN	BLH20130715ADX	44.9	311.6
WQUT	FM	268C	Johnson City	TN	BMLH19980904KD	48.3	288.2
WXBQ-FM	FM	245C	Bristol	VA	BLH19950914KB	43.2	320.3
WKSK	AM	580	West Jefferson	NC	BL20011004AAY	42.8	44.1

Distance and bearing calculations from coordinates: 36-08-02 N, 081-49-42 W

Duopoly Options:

TV: Not Included

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

AM: 5.0 mV/m

**Table 2: Stations in Radio Market Two**

Total number of overlapping contours: 23

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
Mkt Two						0	0
WWMYm	FM	272A	Beech Mountain	NC	Proposed	13.8	263.9
WZJSm	FM	264A	Banner Elk	NC	Proposed	13.8	263.9
WMMY	FM	291C3	Jefferson	NC	BLH20000104ABR	19.4	40.2
WXIT	AM	1200	Blowing rock	NC	BL20160805ABU	3	48.6
WATA	AM	1450	BooneE	NC	BL14405	3	48.6
Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WNCW	FM	204C	Spindale	NC	143612	72	224.6
WASU-FM	FM	213A	Boone	NC	BLED20110803AAZ	4.6	33.6
WKBC-FM	FM	247C	North Wilkesboro	NC	BLH19970711KA	55.5	103.9
WMIT	FM	295C	Black Mountain	NC	BML20161027AAG	72	224.6
WCQR-FM	FM	202C2	Kingsport	TN	BLED19961120KB	45	305.2
WETS-FM	FM	208C	Johnson City	TN	BML20060802ATX	45	305.6
WHCB	FM	218C1	Bristol	TN	BLED19930210KD	45	305.7
WFHG-FM	FM	225C2	Bluff City	TN	BLH20120601ALI	55.5	278.4
WTFM	FM	253C	Kingsport	TN	BLH20190412ABM	45	305.2
WEXX	FM	257C3	Elizabethton	TN	BLH20130715ADX	48.4	298
WQUT	FM	268C	Johnson City	TN	BMLH19980904KD	55.6	278.3
WVTR	FM	220C2	Marion	VA	BLED19911030KA	71.8	31.7
WMEV-							
FM	FM	230C	Marion	VA	BLH20060512AAB	79.7	11.9
WXBQ-FM	FM	245C	Bristol	VA	BLH19950914KB	45.1	305.5
WBRF	FM	251C	Galax	VA	BLH19910423KA	90.4	63.4
WKBC	AM	800	North Wilkesboro	NC	BL19981110AB	52.7	91.1
WKSK	AM	580	West Jefferson	NC	BL20011004AAY	31.4	41.3
WMCT	AM	1390	Mountain City	TN	BML20160615ABQ	32.8	350.5

Distance and bearing calculations from coordinates: 36-11-54 N, 081-43-37 W

Duopoly Options:

TV: Not Included

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

AM: 5.0 mV/m

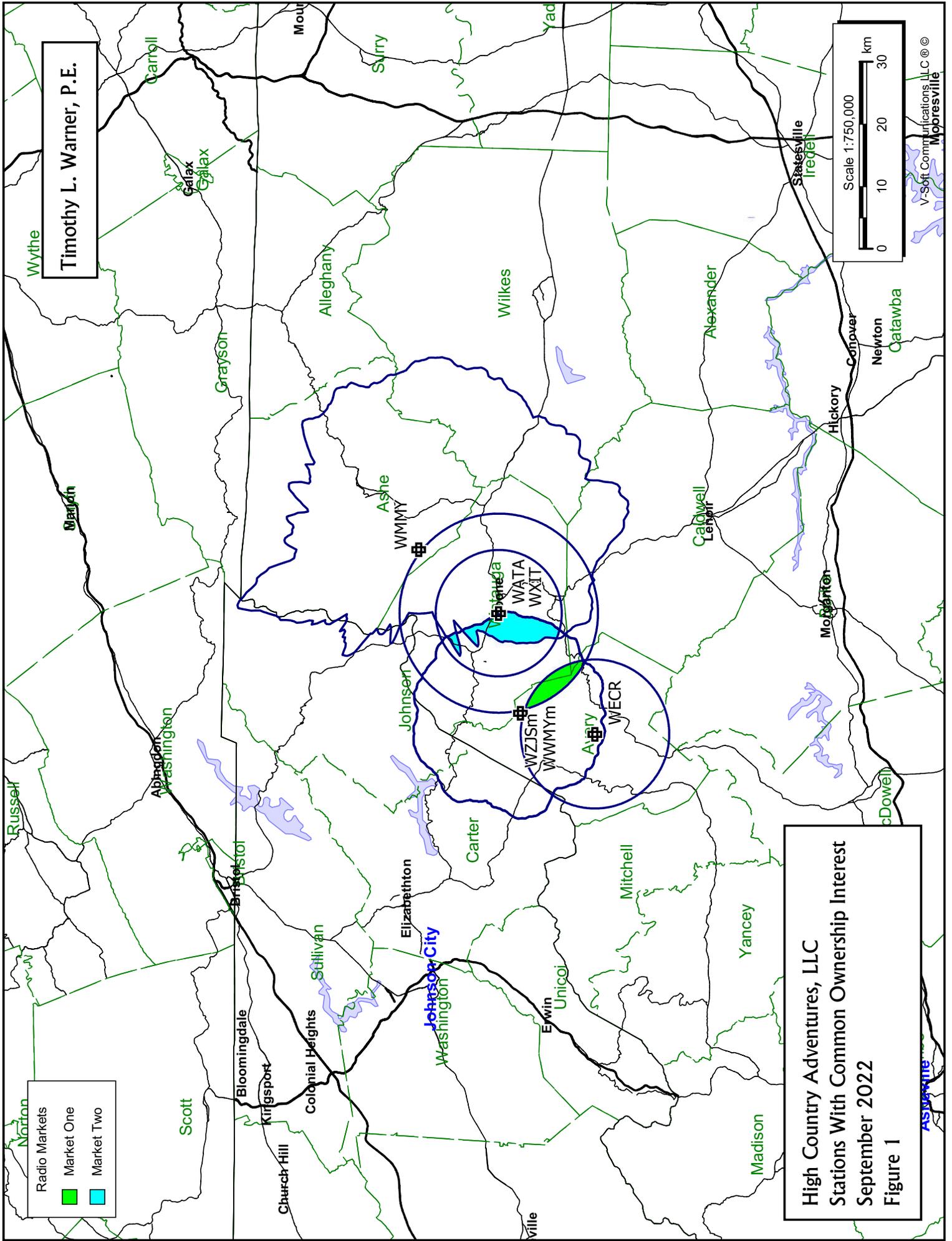
### Compliance with § 73.3555 Multiple Ownership Rules

In Market One, the number of stations defining the market plus the number of stations with common contour overlap that do not have attributable ownership interest is 17. In Market Two, the number of stations defining the market plus the number of stations with common contour overlap that do not have attributable ownership interest is 23. For each market, the applicable regulation section is §73.3555(a)(1)(iii). “A person or single entity (or entities under common control) may have a cognizable interest in licenses for AM or FM radio broadcast stations in accordance with the following limits: . . . (iii) in a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM).” For Market One, the proposed total is four (4) stations, two (2) FM and two (2) AM. For Market Two, the proposed total is five (5) stations, three (3) FM and two (2) AM.

### Source of Data

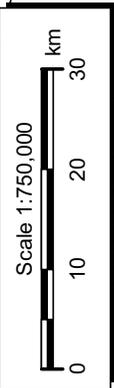
Transmitter location, effective radiated power, directional antenna pattern, and elevation data are extracted from the Commission’s LMS. All contours for existing and proposed facilities are calculated using height above average terrain calculated at one degree horizontal increments.

The contours were evaluated using terrain extracted from the FCC GLOBE 30 Terrain database, formatted by V-Soft Communications to work with its allocation and mapping programs.

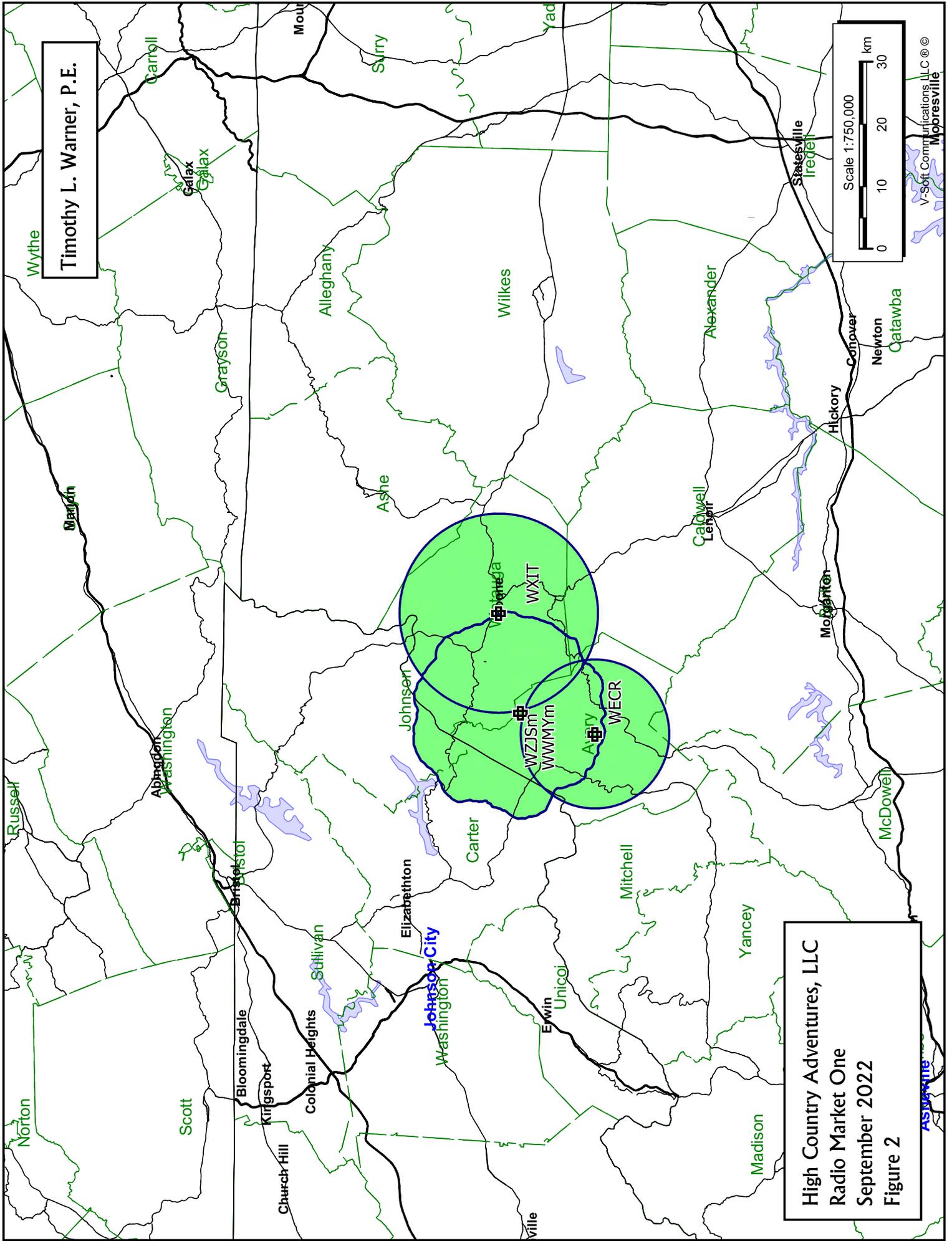


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High Country Adventures, LLC  
 Stations With Common Ownership Interest  
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 Figure 1



V-Soft Communications, LLC ©  
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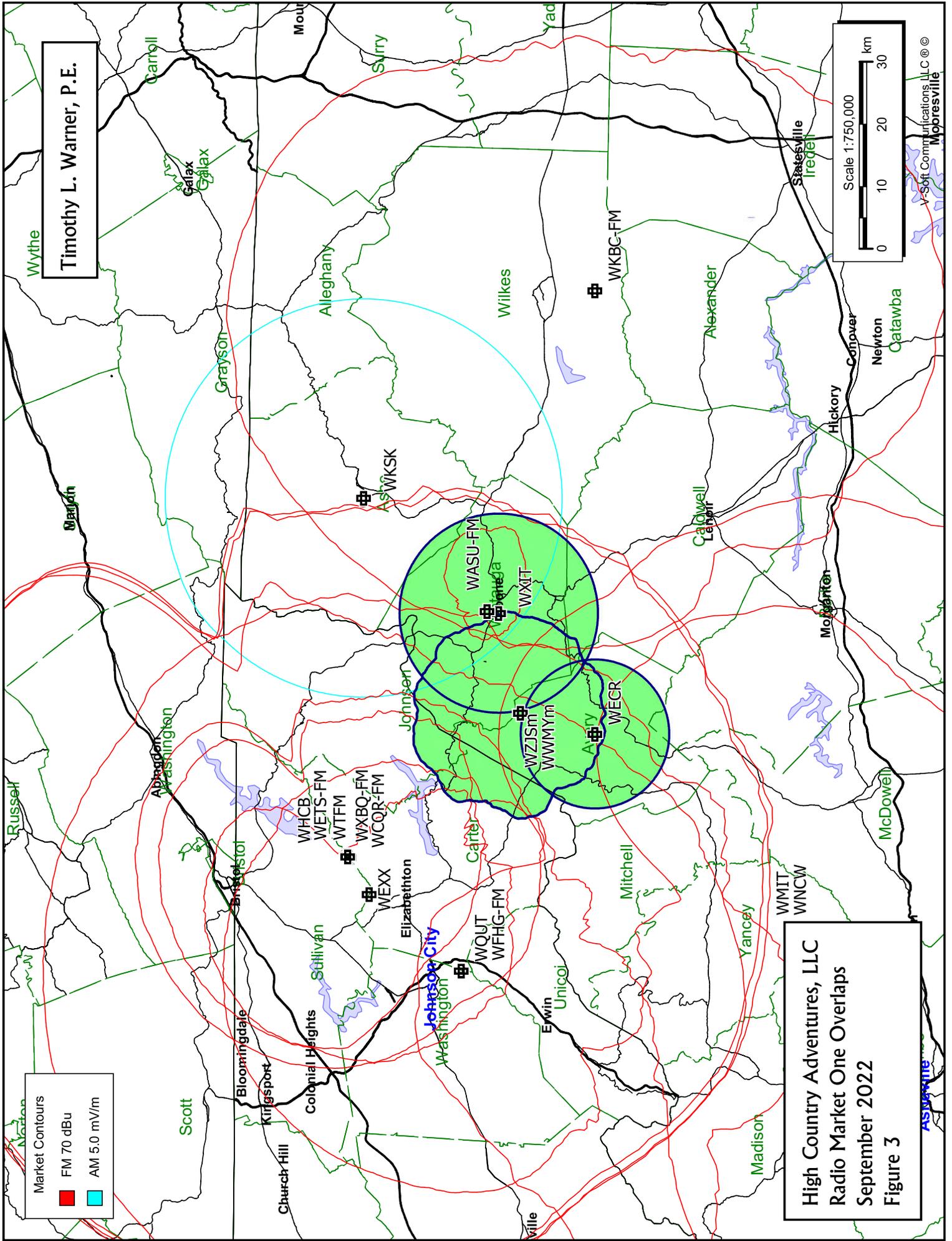


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 Radio Market One  
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 Figure 2



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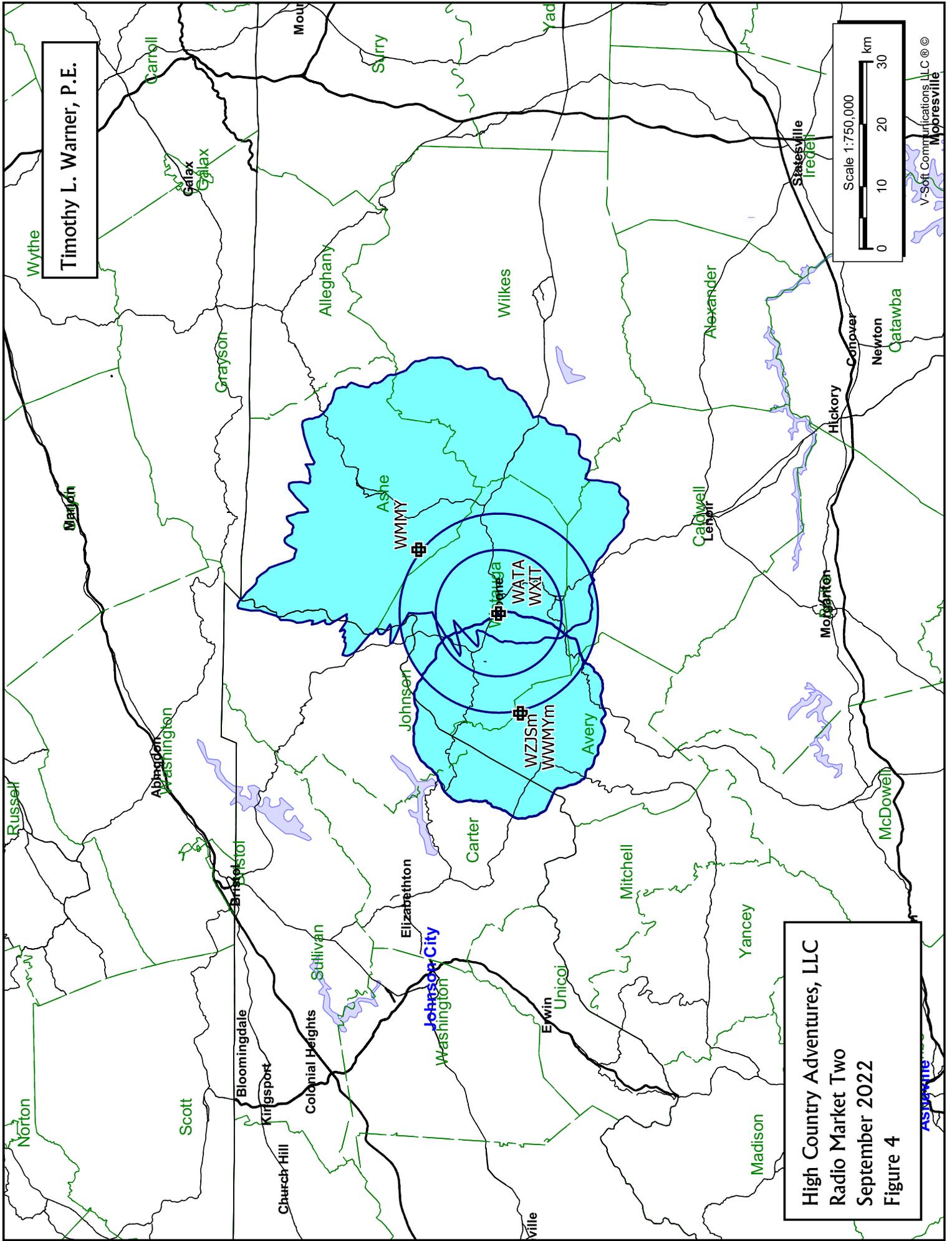
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Market Contours  
 FM 70 dBu  
 AM 5.0 mV/m

Scale 1:750,000  
 0 10 20 30 km

High Country Adventures, LLC  
 Radio Market One Overlaps  
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 Figure 3

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 Radio Market Two  
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 Figure 4



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