



**STATEMENT OF WILLIAM J. GETZ
IN SUPPORT OF AN APPLICATION
FOR CONSENT TO ASSIGNMENT
OF BROADCAST LICENSE**

I am a Radio Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission. This office has been authorized by the Applicant to prepare this statement and the associated exhibits in support of an Application for Consent to Assignment of Broadcast License (FCC Form 2100, Schedule 314) in order to acquire full-service radio station WABT(FM), Lehman Township, PA (Facility ID 53036).

Exhibit A depicts the principal community contours of the proposed station acquisition and the principal community contours of the radio stations in which the applicant currently holds attributable interest (i.e. the subject stations).¹ As illustrated in Exhibit A, the subject stations' principal community contour overlap involve stations which are licensed to communities located both within and outside of a Nielsen Radio Metro Area. Accordingly, this Exhibit demonstrates that the common ownership of the stations listed above is compliant with Section 73.3555 of the FCC Rules as it applies to both the contour-defined radio market and the Nielsen-rated Geographic radio markets.

¹ For the FM stations considered herein, the principal community contour is the predicted 3.16 mV/m (70 dBu) contour computed in accordance with Section 73.313 of the FCC Rules. For the AM stations considered herein, the principal community contour is the predicted daytime 5.0 mV/m groundwave contour computed in accordance with Section 73.183 of the FCC Rules. All stations represented herein are operating full service commercial or noncommercial radio stations and operate from transmitter sites located within 92 kilometers of the perimeter of the Subject Station's mutual 70 dBu contour overlap area.

Multiple Ownership Geographic Market Analysis

Attached is a BIA Market Report which lists the 52 stations counted in the Wilkes Barre-Scranton, PA, Geographic Market. Considering the proposed combination of stations, the Applicant will hold attributable interest in four FM Stations (WABT, WCFT, WLGD and WSBG) and four AM stations (WARM, WBWX, WHLM and WVPO) in the market.

Pursuant to Section 73.3555(a)(1)(i) of the FCC Rules, the applicant is permitted to own eight radio stations (four in the same service) provided the market contains at least 45 or more stations. Because the Geographic Market contains 52 stations, the proposed station acquisition results in a combination of stations which satisfy the multiple ownership geographic market criteria set forth in Section 73.3555 of the FCC Rules.

Multiple Ownership Contour-Defined Market Analysis

As shown in Exhibit A, the worst-case common area of city-grade contour overlap between attributable stations and proposed acquisitions involves at most 2 FM stations and 1 AM stations. The three station radio market is defined by the total principal community contour area of WABT(FM), WSBG(FM) and WVPO(AM). The contour-defined radio market and the principal community contours of the other stations in which the Applicant holds no attributable interest which are counted in the market are also shown on Exhibit A. Table 1 contains each station's call sign, city of license, state, channel of operation, and technical facilities.


Pursuant to Section 73.3555(a)(1)(iv) of the FCC Rules, the applicant is permitted to own three radio stations (two in the same service) provided the market contains at least three other stations in which the application has no cognizable interest (i.e. the applicant cannot have cognizable interest in more than 50% of the market stations). As shown in Exhibit A, the contour-defined radio market contains at least 13 operating commercial or noncommercial radio stations [defined by the city-grade contours of the 3 subject stations and the overlapped by the city-grade contours of at least 10 other stations in which the applicant holds no cognizable interest].

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Accordingly, the proposed station acquisition results in a combination of stations which satisfies the multiple ownership criteria set forth in Section 73.3555 of the FCC Rules.

This statement and the supporting Exhibits and Table were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: November 3, 2022



William J. Getz

FCC Geographic Market Definition for Wilkes Barre-Scranton, PA

| Call Letters | AM/FM | Freq | Type Station | Format | Home Market | Market Designtn Date | Home Mkt Rank | Owner | City & State of License | County of License |
|--------------|-------|-------|--------------|-------------|---------------------------|----------------------|---------------|---|-------------------------|-------------------|
| WAAF | AM | 910 | C | News/Talk | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Audacy | Scranton, PA | Lackawanna |
| WABT | FM | 96.7 | C | Clsc Hits | Wilkes Barre-Scranton, PA | 02/13/2016 | 78 | Neversink Media Group LLC | Lehman Township, PA | Pike |
| WARM | AM | 590 | C | Country | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Southern Belle LLC | Scranton, PA | Lackawanna |
| WAZL | AM | 1490 | C | Religion | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | J.M.J. Radio Inc | Hazleton, PA | Luzerne |
| WBHD | FM | 95.7 | C | CHR | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Cumulus Media Holdings Inc | Olyphant, PA | Lackawanna |
| WBHT | FM | 97.1 | C | CHR | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Cumulus Media Holdings Inc | Mountain Top, PA | Luzerne |
| WBSX | FM | 97.9 | C | Rock | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Cumulus Media Holdings Inc | Hazleton, PA | Luzerne |
| WBWX | AM | 1280 | C | AC/Spt/Nws | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Southern Belle LLC | Berwick, PA | Columbia |
| WBYX | FM | 88.7 | NC | ChrsContem | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Four Rivers Community Broadcasting Corp | Stroudsburg, PA | Monroe |
| WCDJ | FM | 91.3 | NC | ChrsContem | Wilkes Barre-Scranton, PA | 10/27/2005 | 78 | Family Life Ministries Inc | Tunkhannock, PA | Wyoming |
| WCDL | AM | 1440 | C | Oldies | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Bold Gold Media Group LP | Carbondale, PA | Lackawanna |
| WCFT | FM | 106.5 | C | Country | Wilkes Barre-Scranton, PA | 07/20/2016 | 78 | Southern Belle LLC | Bloomsburg, PA | Columbia |
| WCLH | FM | 90.7 | NC | Alt/MRK/HH | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Wilkes University | Wilkes-Barre, PA | Luzerne |
| WEJL | AM | 630 | C | Sports | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Times-Shamrock Communications Inc | Scranton, PA | Lackawanna |
| WESS | FM | 90.3 | NC | Ecltc/Varty | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | East Stroudsburg University | East Stroudsburg, PA | Monroe |
| WEZX | FM | 106.9 | C | Clsc Rock | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Times-Shamrock Communications Inc | Scranton, PA | Lackawanna |
| WFUZ | AM | 1240 | C | Clsc Rock | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Times-Shamrock Communications Inc | Wilkes-Barre, PA | Luzerne |
| WGGY | FM | 101.3 | C | Country | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Audacy | Scranton, PA | Lackawanna |
| WGMF | AM | 730 | C | Clsc Hits | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | GEOS Communications | Nanticoke, PA | Luzerne |
| WGMM | AM | 1460 | C | Clsc Hits | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | GEOS Communications | Tunkhannock, PA | Wyoming |
| WHLM | AM | 930 | C | AC/Spt/Nws | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Southern Belle LLC | Bloomsburg, PA | Columbia |
| WHSK | FM | 91.1 | NC | Variety | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Bloomsburg University of Pennsylvania | Bloomsburg, PA | Columbia |
| WICK | AM | 1400 | C | Oldies | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Bold Gold Media Group LP | Scranton, PA | Lackawanna |
| WILK | AM | 980 | C | News/Talk | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Audacy | Wilkes-Barre, PA | Luzerne |
| WILK | FM | 103.1 | C | News/Talk | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Audacy | Avoca, PA | Luzerne |
| WITK | AM | 1550 | C | Chrst/Talk | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Wilkins Communications Network Inc | Pittston, PA | Luzerne |
| WKBP | FM | 95.9 | NC | ChrsContem | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Educational Media Foundation | Benton, PA | Columbia |
| WKRF | FM | 107.9 | C | CHR | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Audacy | Tobyhanna, PA | Monroe |
| WKRZ | FM | 98.5 | C | CHR | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Audacy | Freeland, PA | Luzerne |
| WLGD | FM | 107.7 | NC | Country | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Southern Belle LLC | Dallas, PA | Luzerne |
| WMGS | FM | 92.9 | C | AC | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Cumulus Media Holdings Inc | Wilkes-Barre, PA | Luzerne |
| WMMZ | FM | 103.5 | C | Clsc Rock | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Bold Gold Media Group LP | Berwick, PA | Columbia |
| WMQX | FM | 102.3 | C | Adult Hits | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Audacy | Pittston, PA | Luzerne |
| WODS | AM | 1300 | C | News/Talk | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Audacy | West Hazleton, PA | Luzerne |

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

"p" indicates pending sale to owner listed

FCC Geographic Market Definition for Wilkes Barre-Scranton, PA

| Call Letters | AM/FM | Freq | Type Station | Format | Home Market | Market Designtn Date | Home Mkt Rank | Owner | City & State of License | County of License |
|--------------|-------|-------|--------------|-------------|---------------------------|----------------------|---------------|--|-------------------------|-------------------|
| WPAL | FM | 90.5 | NC | Country | Wilkes Barre-Scranton, PA | 06/17/2011 | 78 | Smith & Fitzgerald Partnership | Laceyville, PA | Wyoming |
| WPZX | FM | 105.9 | C | Clsc Rock | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Times-Shamrock Communications Inc | Pocono Pines, PA | Monroe |
| WQFM | FM | 92.1 | C | Hot AC | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Times-Shamrock Communications Inc | Nanticoke, PA | Luzerne |
| WQFN | FM | 100.1 | C | Hot AC | Wilkes Barre-Scranton, PA | 04/28/2011 | 78 | Times-Shamrock Communications Inc | Forest City, PA | Susquehanna |
| WQOR | AM | 750 | C | Religion | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | J.M.J. Radio Inc | Olyphant, PA | Lackawanna |
| WRGN | FM | 88.1 | NC | Christian | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Good News For Life | Sweet Valley, PA | Luzerne |
| WRKC | FM | 88.5 | NC | Variety | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Kings College | Wilkes-Barre, PA | Luzerne |
| WRTY | FM | 91.1 | NC | Clsc/Jazz | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Temple University of Comnwlth System of Higher | Jackson Township, PA | Monroe |
| WSBG | FM | 93.5 | C | AC | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Southern Belle LLC | Stroudsburg, PA | Monroe |
| WSFX | FM | 89.1 | NC | Alternative | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Luzerne County Community College | Nanticoke, PA | Luzerne |
| WSJR | FM | 93.7 | C | Country | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Cumulus Media Holdings Inc | Dallas, PA | Luzerne |
| WTRW | FM | 94.3 | C | Talk | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Bold Gold Media Group LP | Carbondale, PA | Lackawanna |
| WUSR | FM | 99.5 | NC | Alternative | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | University Of Scranton | Scranton, PA | Lackawanna |
| WVIA | FM | 89.9 | NC | Cls/NPR/Jaz | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | NE PA Educational TV Association | Scranton, PA | Lackawanna |
| WVMW | FM | 91.7 | NC | Alternative | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Marywood University | Scranton, PA | Lackawanna |
| WVPO | AM | 840 | C | Country | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Southern Belle LLC | Stroudsburg, PA | Monroe |
| WWRR | FM | 104.9 | C | Clsc Rock | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Bold Gold Media Group LP | Scranton, PA | Lackawanna |
| WYCK | AM | 1340 | C | Clsc Rock | Wilkes Barre-Scranton, PA | 07/02/2003 | 78 | Bold Gold Media Group LP | Plains, PA | Luzerne |

Number of Stations in Geographic Market 52

Previous Stations in Geographic Market

| | | | | | | | | | | |
|------|----|-------|---|-----------|--|------------|---|--------------------------|---------------|-------|
| WDNH | FM | 95.3 | C | AC | | 04/16/2021 | 0 | Bold Gold Media Group LP | Honesdale, PA | Wayne |
| WPSN | AM | 1590 | C | News/Talk | | 04/16/2021 | 0 | Bold Gold Media Group LP | Honesdale, PA | Wayne |
| WYCY | FM | 105.3 | C | Clsc Hits | | 04/16/2021 | 0 | Bold Gold Media Group LP | Hawley, PA | Wayne |

**Technical Description of Stations
Counted in Proposed Radio Market**

November, 2022

| | <u>Call</u> | <u>Status</u> | <u>Channel/Freq</u> | <u>Service</u> | <u>City</u> | <u>State</u> | <u>DA</u> | AM Day Power <u>FM ERP (kW)</u> | <u>Fac. ID</u> |
|----|-------------|---------------|---------------------|----------------|------------------|--------------|-----------|---|----------------|
| 1 | WABT*# | LIC | 244 | FM | Lehman Township | PA | Yes | 5 | 53036 |
| 2 | WSBG* | LIC | 228 | FM | Stroudsburg | PA | No | 0.43 | 47424 |
| 3 | WVPO* | LIC | 840 | AM | Stroudsburg | PA | No | 0.25 | 47423 |
| 4 | WKRF | LIC | 300 | FM | Tobyhanna | PA | No | 0.83 | 14643 |
| 5 | WESS | LIC | 212 | FM | East Stroudsburg | PA | No | 1 | 18247 |
| 6 | WBYX | LIC | 204 | FM | Stroudsburg | PA | Yes | 4 | 22181 |
| 7 | WHCY | LIC | 292 | FM | Blairstown | NJ | No | 0.43 | 11984 |
| 8 | WNNJ | LIC | 279 | FM | Newton | NJ | No | 2.3 | 25413 |
| 9 | WWPJ | LIC | 208 | FM | Pen Argyl | PA | Yes | 0.225 | 78699 |
| 10 | WWYY | LIC | 296 | FM | Belvidere | NJ | No | 0.84 | 54689 |
| 11 | WRTY | LIC | 216 | FM | Jackson Township | PA | Yes | 3.5 | 65178 |
| 12 | WXPJ | LIC | 220 | FM | Hackettstown | NJ | No | 5.4 | 9759 |
| 13 | WEEX | LIC | 1230 | AM | Easton | PA | No | 1 | 8596 |

* Subject Station - Principal community contour defines the radio market boundary

Proposed Acquisition