

MULTIPLE OWNERSHIP CONSIDERATIONS
(Page 1 of 5)
Thumb Broadcasting, Inc.
Pigeon, MI

This exhibit documents that the continued common ownership of WHST with WLEW(AM) and WLEW-FM will continue to comply with the local radio ownership restrictions outlined in Section 73.3555 of the FCC Rules. None of these three stations are assigned to a Nielsen Audio metro market. Nor are the communities of license of any of these three stations located within the geographic boundaries of any Nielsen Audio metro market. As a result, the Nielsen Audio metro market methodology for defining radio markets is not applicable to this situation.

For this reason, as required by Paragraph 286 of the FCC's July 2, 2003 *Report and Order and Notice of Proposed Rulemaking* in MB Dockets 02-277, 01-235, 01-317, 00-244, and 03-130, contour overlap studies were conducted for the market defined by the principal community contour overlap between WLEW, WLEW-FM, and the proposed WHST facilities.¹ Attached is a map exhibit depicting the principal community contours for these three stations. The 5 mV/m daytime contour for WLEW was projected utilizing the notified daytime facilities from the FCC's Consolidated Database System ("CDBS") and soil conductivity data from FCC Figure M3. The 3.16 mV/m contour for WLEW-FM was projected using the notified facilities from the CDBS and terrain data extracted from the NGDC 30 second terrain database. The 3.16 mV/m contour for the proposed WHST facilities was projected using the proposed facilities and terrain data extracted from the NGDC 30 second terrain database. As shown in this figure, there is an area of common principal community overlap between all three of these commonly owned sta-

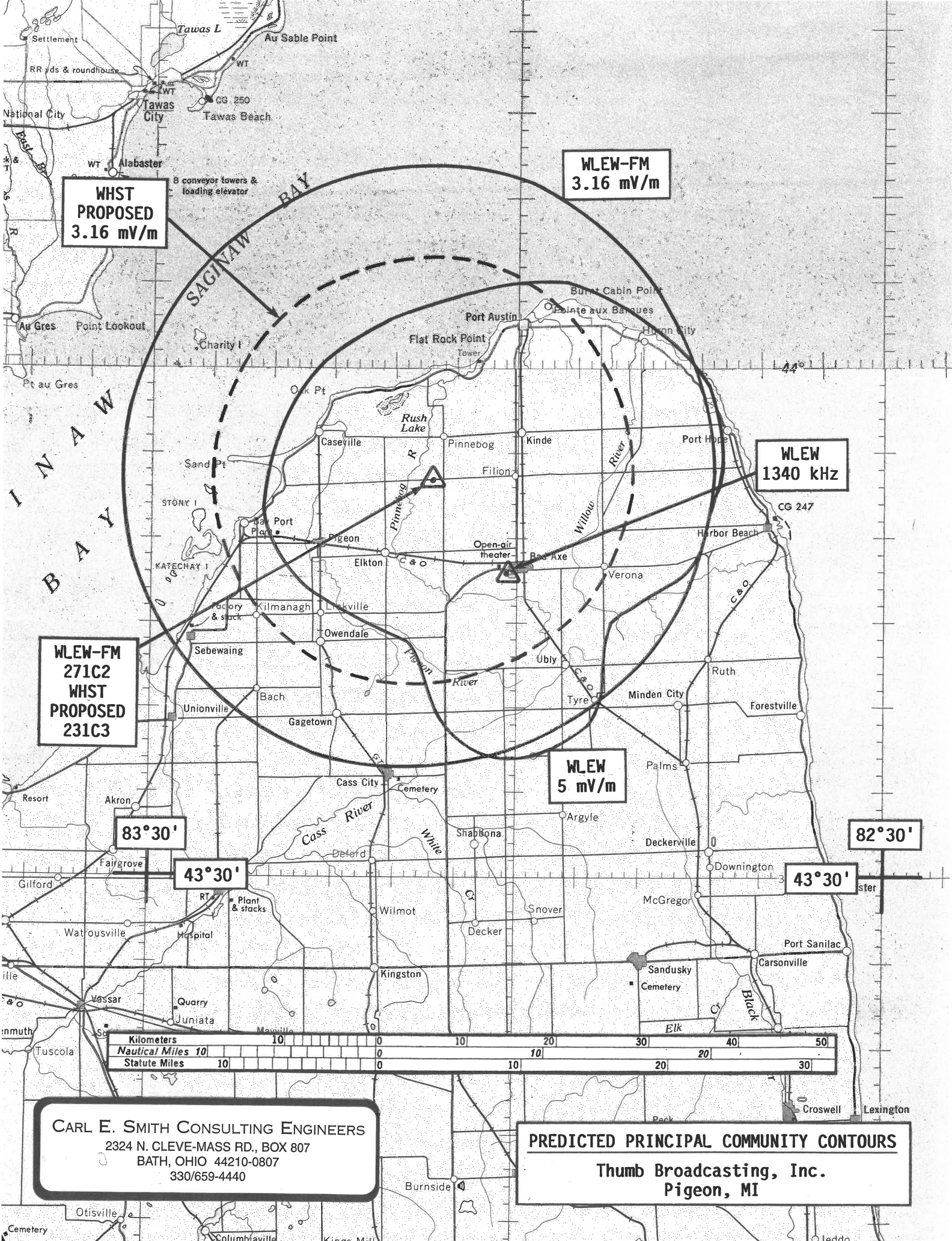
¹These contour overlap studies were conducted utilizing the modified contour overlap methodology outlined in Paragraph 285 of the FCC's July 2, 2003 *Report and Order and Notice of Proposed Rule-making* in MB Dockets 02-277, 01-235, 01-317, 00-244, and 03-130.

MULTIPLE OWNERSHIP CONSIDERATIONS
(Page 2 of 5)
Thumb Broadcasting, Inc.
Pigeon, MI

tions. Thus, these three stations form a single contour based market for the purposes of this analysis.

Attached is a map exhibit that shows the composite principal community contour for the contour based market formed by these three commonly owned stations. Also shown in this figure are the transmitter sites of all operating stations located within this contour. Also attached is a tabulation of the stations depicted in this figure. As shown by this data, there are 7 stations, including WLEW, WLEW-FM, and the proposed station, whose transmitter sites are located within this composite principal community contour. Thus, it can be safely said that there are at least seven stations in the contour based market defined by the principal community contours of these three stations. In fact, the number of stations in this market would be even greater if stations located outside this composite contour whose principal community contours overlap this composite contour were included in this total. No such further analysis is required in this case, however, since, in markets containing 14 or fewer stations, Section 73.3555(a)(1)(iv) of the FCC Rules permits the common ownership of up to 5 commercial stations, not more than 3 of which are in the same service, provided, however, that no person or single entity (or entities under common control) may have a cognizable interest in more than 50% of the full-power, commercial and non-commercial radio stations in such market. The instant situation involves the common ownership of one AM and two FM stations in this contour based market, which does not exceed the permitted maximum.

Based upon the above information, the common ownership of these three stations will fully comply with the local radio ownership restrictions specified in Section 73.3555 of the FCC Rules.



**WHST
PROPOSED
3.16 mV/m**

**WLEW-FM
3.16 mV/m**

**WLEW
1340 kHz**

**WLEW-FM
271C2
WHST
PROPOSED
231C3**

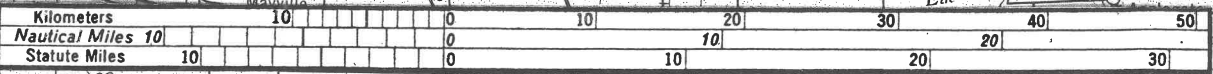
**WLEW
5 mV/m**

83°30'

43°30'

82°30'

43°30'



CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440

PREDICTED PRINCIPAL COMMUNITY CONTOURS
Thumb Broadcasting, Inc.
Pigeon, MI



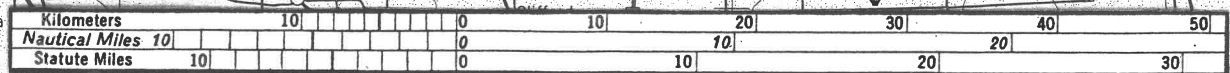
COMPOSITE
PRINCIPAL
COMMUNITY
CONTOUR

83°30'

43°30'

82°30'

43°30'



CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440

STATIONS IN MARKET
Thumb Broadcasting, Inc.
Pigeon, MI

STATIONS IN MARKET
Thumb Broadcasting, Inc.
Pigeon, MI

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
1	WLEW	1340	Bad Axe, MI
2	WCTP	203A	Gagetown, MI
3	WSMB	207C3	Harbor Beach, MI
4	WIDL	221C3	Cass City, MI
5	WHST	231C3	Pigeon, MI
6	WLEW-FM	271C2	Bad Axe, MI
7	WCZE	279C2	Harbor Beach, MI