

Technical Report  
In Support of a  
47 C.F.R. Section 73.3555  
Based  
Interim Contour Method  
Multiple Ownership Study  
*for*

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*Saga Communications of Indiana, LLC*

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*For the Purchase of*

*WKHY(FM) – Lafayette, IN (Facility ID: 63185)  
WKOA(FM) – Lafayette, IN (Facility ID: 71064)  
WXXB(FM) – Delphi, IN (Facility ID: 72676)  
WASK-FM – Battle Ground, IN (Facility ID: 59361)  
WASK(AM) – Lafayette, IN (Facility ID: 71065)*

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**EXPLANATION OF REPORT:** This Technical Report has been prepared to determine the number of commercial and non-commercial principal community contours associated with the purchase of WKHY(FM) – Lafayette, IN; WKOA(FM) – Lafayette, IN; WXXB(FM) – Delphi, IN; WASK-FM – Battle Ground, IN; and WASK(AM) – Lafayette, IN by Saga Communications of Indiana, LLC (“Saga”). None of the facilities to be acquired are presently listed in, or reside within, any BIA Market as reported by Nielson; therefore, this report has been prepared solely using the Interim Contour-Overlap Methodology.

Saga Communications of Indiana, LLC and its parent company Saga Communications, Inc. presently hold interest in aural services nationwide. However, in addition to the five (5) stations to be acquired, only one (1) additional existing holding is relevant to these Transfer/Assignment filings. Co-owned holdings not overlapping these stations need not be discussed herein. Concerning these relevant holdings, there will be two (2) unique and distinct interim method markets within this affected ownership group. “Market A” is comprised of five (5) stations. “Market B” is comprised of two (2) stations. Each market is defined as follows:

**“Market A”**

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WKHY (FM)	228A	Lafayette	IN	BLH20140819ABR
WKOA (FM)	287B	Lafayette	IN	BLH20150528ABU
WXXB (FM)	275A	Delphi	IN	BLH20141001ALB
WASK-FM	254A	Battle Ground	IN	BLH19930323KF
WASK (AM)	1450	LAFAYETTE	IN	BL20151103BCZ

**“Market B”**

<u>CALL SIGN</u>	<u>CH/FREQ</u>	<u>CITY</u>	<u>STATE</u>	<u>FILE NUMBER</u>
WKOA (FM)	287B	Lafayette	IN	BLH20150528ABU
WFNI (AM)	1070	INDIANAPOLIS	IN	BML20070521AIV <sup>1</sup>

**EXPLANATION OF METHODOLOGY:** The facilities and results reported herein were taken from current copies of AM and FM computer databases as prepared by the FCC and supplied by V-Soft Communications, LLC. The facilities listed above serve as the basis for the respective principal community contours studied. The accuracy of the results of this study is understood to be limited to the accuracy of these databases. The FCC databases give no indication of licensed facilities that may be inoperative, construction permit facilities that may now be operating under program test authority (*but have not yet been issued a license*) or facilities which may have been licensed since the last update. Therefore, some stations may have been included or excluded erroneously. However, unless otherwise indicated, all licensed facilities known to be inoperative and all known applications and construction permit facilities, have been eliminated from consideration in this study.

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<sup>1</sup> Existing Saga Communications, Inc., director Michael Schechter is also a director of Emmis Communications Corporation, which is the parent corporation of Emmis Radio License, LLC, licensee of WFNI(AM), Indianapolis, IN (Facility ID No. 19521). Therefore, Saga Communications of Indiana, LLC, through its parent company, Saga Communications, Inc., holds an attributable interest in WFNI(AM).

For AM stations, Map M3 soil conductivity values and the authorized licensed transmitting facilities served as the basis for the computation of the predicted 5.0 mV/m groundwave contour in accordance with 47 C.F.R. Section 73.183 of the FCC Rules. The distance to the contour was computed for seventy-two (72) equally spaced azimuths beginning with 0° True. For FM stations, the authorized Center of Radiation and ERP values were utilized to compute the predicted 3.16 mV/m (70 dBμ) contour as provided in 47 C.F.R. Section 73.313 of the Rules. The predicted FM contours shown in this report are based on seventy-two (72) equally spaced terrain radials beginning with 0° True and assume NED 03 Second Terrain data.

As stated before, there will be two (2) unique and distinct markets associated with this proposal. Each market has been defined, in accordance with 47 C.F.R. Section 73.3555 of the FCC Rules, as the area within the total perimeter formed by the combined principal community contours of each market as noted above.

**EXPLANATION OF RESULTS:** The five (5) stations to be acquired, and one (1) additional station under common control and relevant for this ownership group, have been noted in ***Exhibit 1.0***. No other Saga holdings will be affected by this purchase. To aid in identifying the respective contours, FM contours to be purchased have been shown with dashed purple lines. AM contours to be purchased have been shown with dashed red lines. The “Market A” and “Market B” common overlap areas have been designated as well.

For “Market A”, the market defining contours have been shown in ***Exhibit 2.0*** of this report along with the total number of principal community contours entering the market. The defining contours have been shown with yellow lines on this map. AM contours entering the market have been denoted in blue lines. FM contour entering the market have been shown in red lines. As stated before, the contours shown represent the total station count as outlined in the Rules. When applicable, co-owned stations entering the market, but not defining the market have been omitted. In this instance, co-controlled station WFNI(AM) - Indianapolis, IN has been omitted from the Market A total station count.

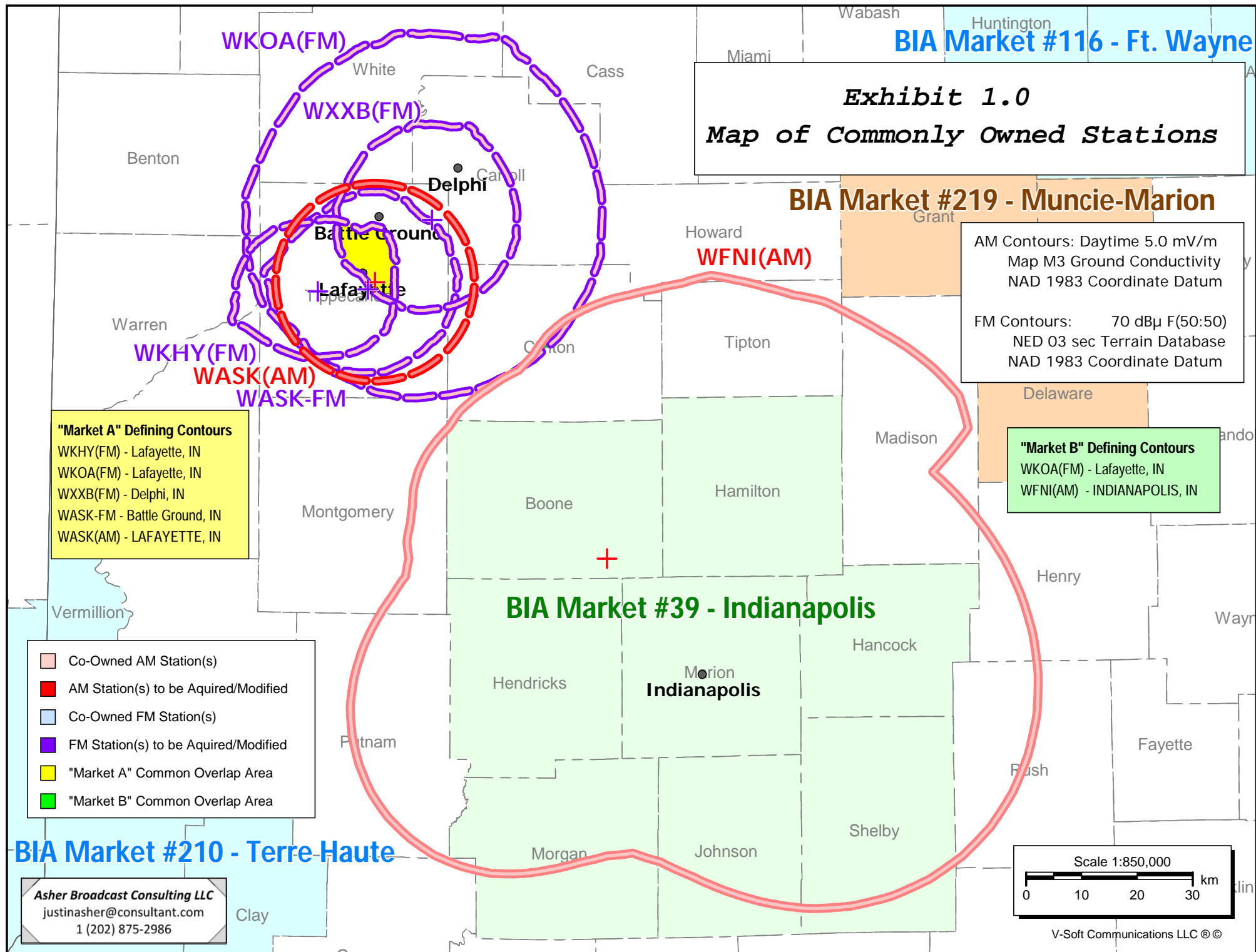
Under the current rules, “Market A” falls within the minimum limitations set forth in §73.3555(a)(1)(iii): *In a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM) [may be owned].* The principal community contours of at least twenty-three (23) other stations entering the market are shown in ***Exhibit 2.0***. Including the four (4) FM stations and one (1) AM station which define the market, there are twenty-eight (28) aural services in “Market A”. ***Exhibit 2.1*** lists the facilities of the individual stations used in this report.

For "Market B", the market defining contours remain shown in **Exhibit 1.0** of this report. The defining contours demonstrate overlap between no more than one (1) FM station and one (1) AM station. Under the latter provisions as set forth in §73.3555(a)(1)(iv): *...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 noncommercial radio stations in such market unless the combination of stations comprises not more than one AM and one FM station.* As the above ownership one (1) AM and one (1) FM station falls under the latter provision of §73.3555(a)(1)(iv), this "Market B" is categorically permitted.

**CERTIFICATION OF TECHNICAL CONSULTANT:** *I declare, under penalty of perjury, that the contents of this report are true and accurate to the best of my knowledge and belief. I further certify I have over twenty-four years of experience as a broadcast technical consultant before the Federal Communications Commission ("the FCC"); and am familiar with the Code of Federal Regulations Title 47 ("the Rules") as pertaining to this report and its contents herein. The underlying data utilized in this report was taken directly from FCC databases or indirectly through third party software vendors securing data directly from FCC databases. This firm cannot be held liable for errors or omissions resulting from the underlying data. The information contained herein is believed accurate to the date reported below.*



Justin W. Asher  
Technical Consultant  
January 28, 2024



- FM Station(s) Entering "Market A"
- AM Station(s) Entering "Market A"
- "Market A" Defining Contours

AM Contours: Daytime 5.0 mV/m  
Map M3 Ground Conductivity  
NAD 1983 Coordinate Datum

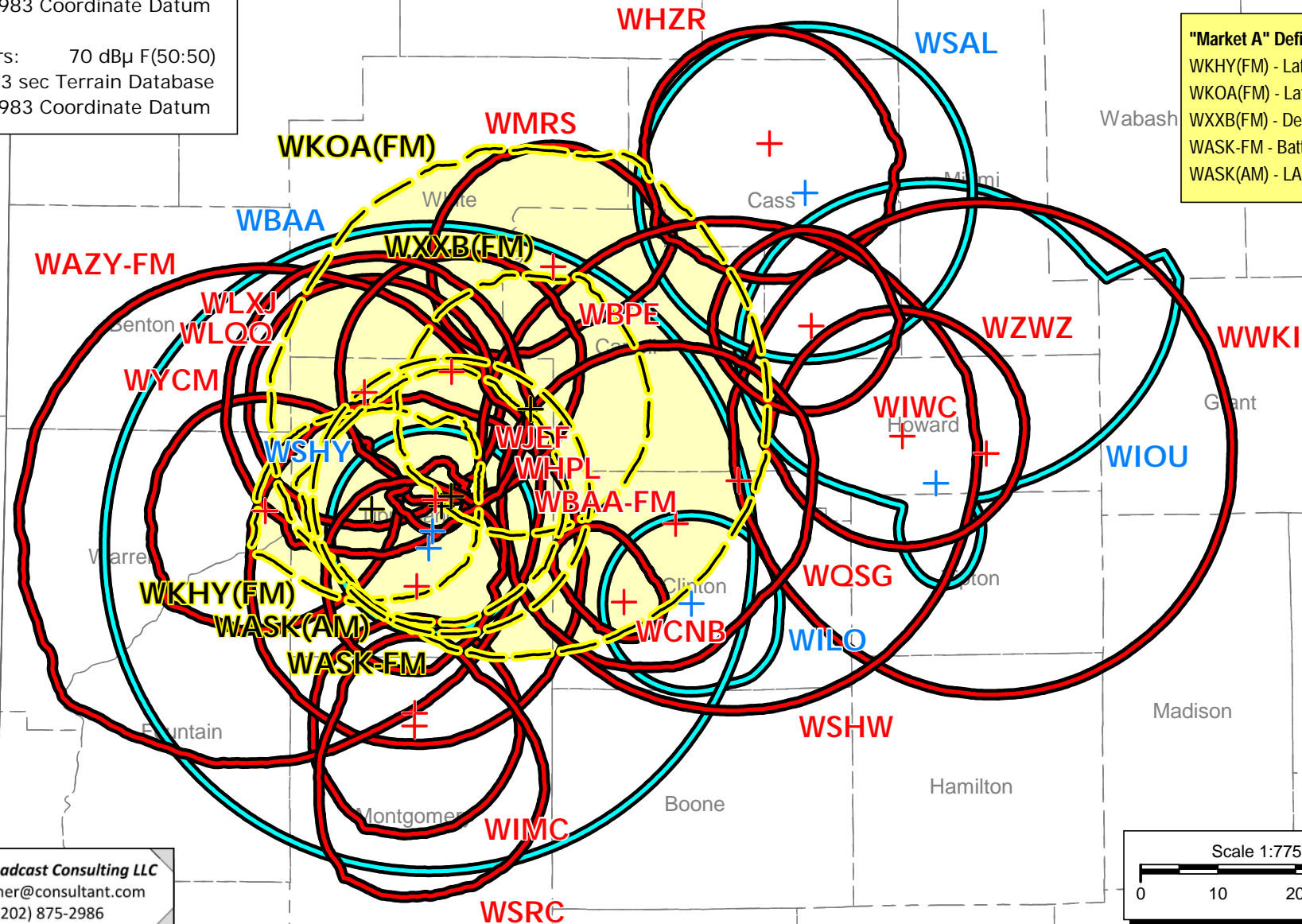
FM Contours: 70 dBμ F(50:50)  
NED 03 sec Terrain Database  
NAD 1983 Coordinate Datum

## Exhibit 2.0

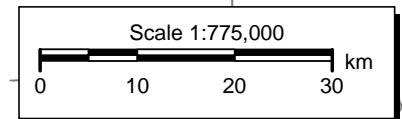
### Map of Stations Entering "Market A"

#### "Market A" Defining Contours

WKHY(FM) - Lafayette, IN  
WKOA(FM) - Lafayette, IN  
WXXB(FM) - Delphi, IN  
WASK-FM - Battle Ground, IN  
WASK(AM) - LAFAYETTE, IN



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# ***Exhibit 2.1***

## ***Tabulation of Stations Entering “Market A”***

Total number of overlapping contours: 28

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WKHY(FM)	FM	228A Lafayette	IN	BLH20140819ABR	0.0	0.0
WKOA(FM)	FM	287B Lafayette	IN	BLH20150528ABU	24.2	57.5
WXXB(FM)	FM	275A Delphi	IN	BLH20141001ALB	24.2	57.5
WASK-FM	FM	254A Battle Ground	IN	BLH19930323KF	9.0	87.2
WASK(AM)	AM	1450 LAFAYETTE	IN	BL20151103BCZ	10.4	80.4

Overlapping Contours:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WSRC	FM	201B1 Waynetown	IN	BLED20100903AAE	26.9	167.8
WLXJ	FM	205B1 Battle Ground	IN	BLED20180131AAW	15.1	356.2
WHPL	FM	210A West Lafayette	IN	0000112134	11.5	149.4
WQSG	FM	214B1 Lafayette	IN	BLED20051122ABJ	39.2	92.5
WCNB	FM	218A Dayton	IN	BLED20190621AAK	34.7	110.0
WIWC	FM	219A Kokomo	IN	BMLD20030404ABG	61.4	67.1
WJEF	FM	220A Lafayette	IN	BMLD20041210ABG	8.3	81.4
WZVZ	FM	223A Kokomo	IN	BLH19950120KB	69.1	81.9
WBPE	FM	237A Brookston	IN	BLH19920702KC	20.5	29.9
WYCM	FM	239A Attica	IN	BLH19950929KF	13.7	268.8
WAZY-FM	FM	243B Lafayette	IN	BLH7632	13.7	268.8
WSHW	FM	259B Frankfort	IN	0000211615	47.5	85.3
WKKI	FM	263B Kokomo	IN	BLH19901120KD	79.6	84.5
WBAA-FM	FM	267B1 West Lafayette	IN	BLED20090702ADF	11.5	149.4
WHZR	FM	279A Royal Center	IN	BLH19890705KA	69.7	47.1
WIMC	FM	280A Crawfordsville	IN	BMLH20070306AAL	28.5	168.5
WLQQ	FM	294A West Lafayette	IN	BMLH20171030ABA	15.1	356.2
WMRS	FM	299A Monticello	IN	BLH19950804KB	39.1	36.5
WBAA	AM	920 WEST LAFAYETTE	IN	BL19830315AG	8.9	124.2
WSAL	AM	1230 LOGANSPOET	IN	BL12233	69.2	53.6
WSHY	AM	1410 LAFAYETTE	IN	BL20211123AAE	8.3	109.5
WILO	AM	1570 FRANKFORT	IN	BL5172	43.0	106.2
WIOU	AM	1350 KOKOMO	IN	BMML20170817ABF	72.8	87.1
<i>WFNI*</i>	<i>AM</i>	<i>1070 INDIANAPOLIS</i>	<i>IN</i>	<i>BML20070521AIV</i>	<i>70.8</i>	<i>132.3</i>

Distance and bearing calculations from coordinates: 40-23-12.10 N, 086-58-14 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.

*\*WFNI(AM) - Indianapolis, IN has been excluded from the Market A station count as existing Saga Communications, Inc., director Michael Schechter is also a director of Emmis Communications Corporation, which is the parent corporation of Emmis Radio License, LLC, licensee of WFNI(AM), Indianapolis, IN (Facility ID No. 19521). Therefore, Saga Communications of Indiana, LLC, through its parent company, Saga Communications, Inc., holds an attributable interest in WFNI(AM).*