

RADIO MARKET ANALYSIS  
SOUND COMMUNICATIONS, INC.  
WPHD, SOUTH WAVERLY, PA  
JULY 2017

1. This study and attached exhibits were prepared on behalf of Sound Communications, Inc. ("SCI"), the proposed assignee of WPHD. SCI is the licensee of WENY (AM), 1230 kHz, Elmira, NY; WENI (AM), 1450 kHz, Corning, NY; WENI-FM, Channel 249, Big Flats, NY; and WGMM (FM), Channel 254, Corning, NY. SCI is also the licensee of WENY-FM, Channel 224, Elmira, NY; but this station will be exchanged simultaneously with the assignment of WPHD and will not be licensed by SCI with WPHD. WPHD is licensed to a community outside of all Nielsen Markets and is not "home" to any Nielsen Market. Because of the overlap of contours between these stations, a single radio market is created. The market consists of FM stations WPHD, WENI-FM, and WGMM and AM stations WENY and WENI. Based on this overlap, a contour analysis is needed to show compliance with the Commission's ownership rules. Ownership Exhibit 1 is a map depicting the city grade contours of the subject stations.

2. A Contour Study has been conducted to verify that the proposed ownership of WPHD is in compliance with the Commission's multiple ownership rules. The city grade contours of the five subject stations will be used to define the market boundary which will be hereinafter referred to as the Radio Market. No other SCI stations will be considered market contributors, unless they are subject stations in the market under review. Further, no transmitter located more than 92 kilometers from the boundary of the common overlap of the subject stations will be considered.

3. Ownership Exhibit 2 is a depiction of the AM and FM stations (commercial and non-commercial) providing service to the subject radio market, which shows 14 other stations. Ownership Exhibit 3 is a tabulation of the stations in the Radio Market, a total

of 19, including the 5 subject stations. There are additional stations that would provide service to the market, but are not being considered since the number of stations shown is sufficient. The number of stations falls into the 15 to 29 stations tier of 73.3555(a)(1)(iii) of the Commission's rules. At this level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. Because this application, and the grant of the concurrently filed application for consent to the assignment of WENY-FM to an unaffiliated third party would result in the common ownership by SCI of just 5 stations in the Radio Market, this application is in compliance with 73.3555 of the Commission's rules.

4. This study was prepared for SCI by Kevin M. Fitzgerald and uses the RF Software series of computer programs.

## Contour Analysis

Kevin Fitzgerald

Job: WPHD Ownership Market.fmj

Master Database: 2017\_Jun\_22.fmd

Lat: N42:01:55 Lon: W076:47:02 NAD-27

Scale: 1:500000

Channel: 241 Class: A

Status: Licensed, Construction Permit, Application

Channels:

Range: 99 km, Clearance: -0.5km

Comments: No Comments

Description: WPHD Ownership Market; FM Contours are 70 dBu and AM Contours are 5 mV/m;

Ownership Exhibit 1.

rfInvestigator Version 3.8.16

by rfSoftware, Inc.

Date: 7/12/2017 3:49:45 PM

Key:

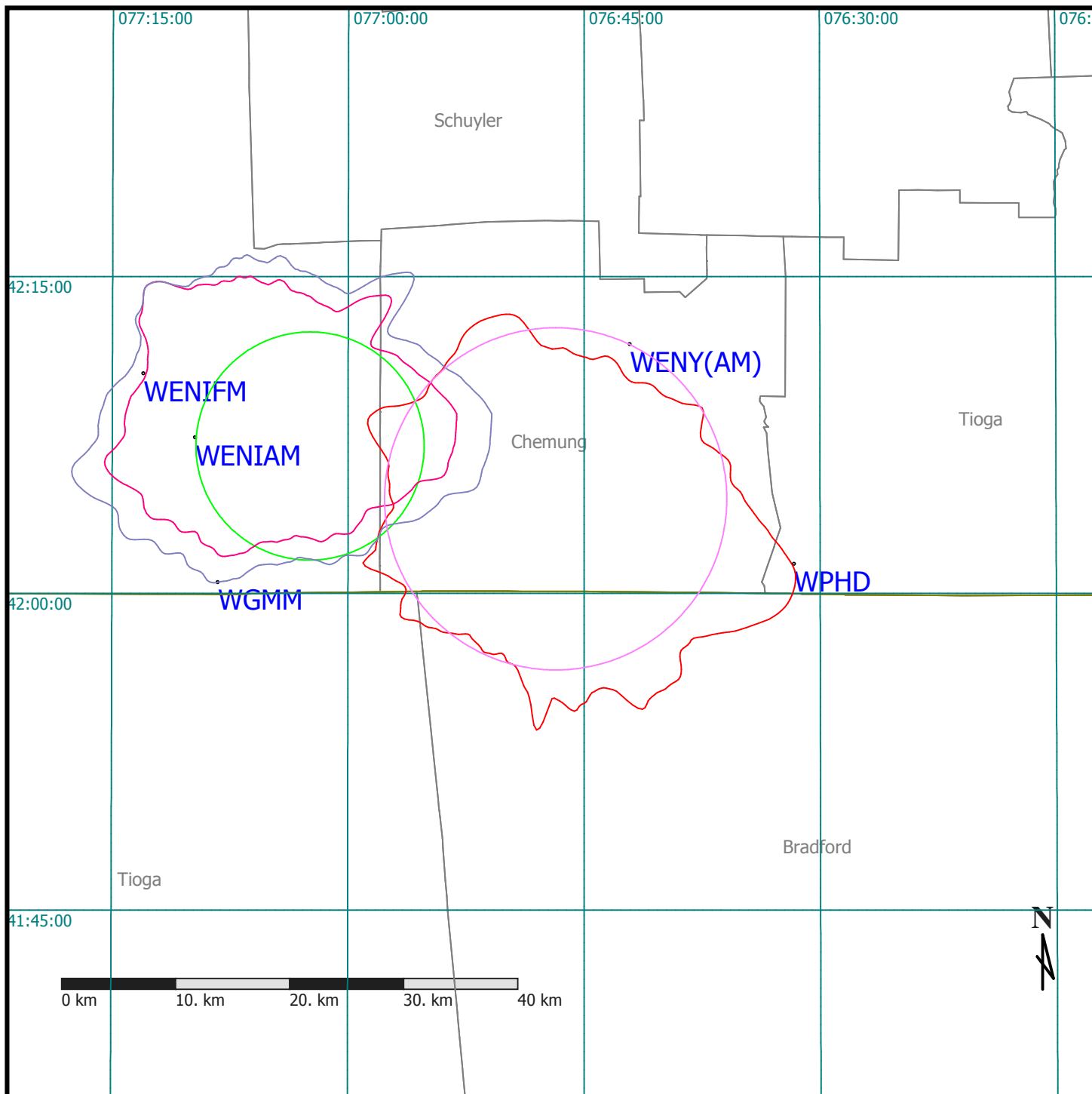
City Grade

Protected

Co-Channel

1st Adj

2nd/3rd Adj



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Ownership Exhibit 2.

rfInvestigator Version 3.8.16

by rfSoftware, Inc.

Date: 7/12/2017 3:52:15 PM

Key:

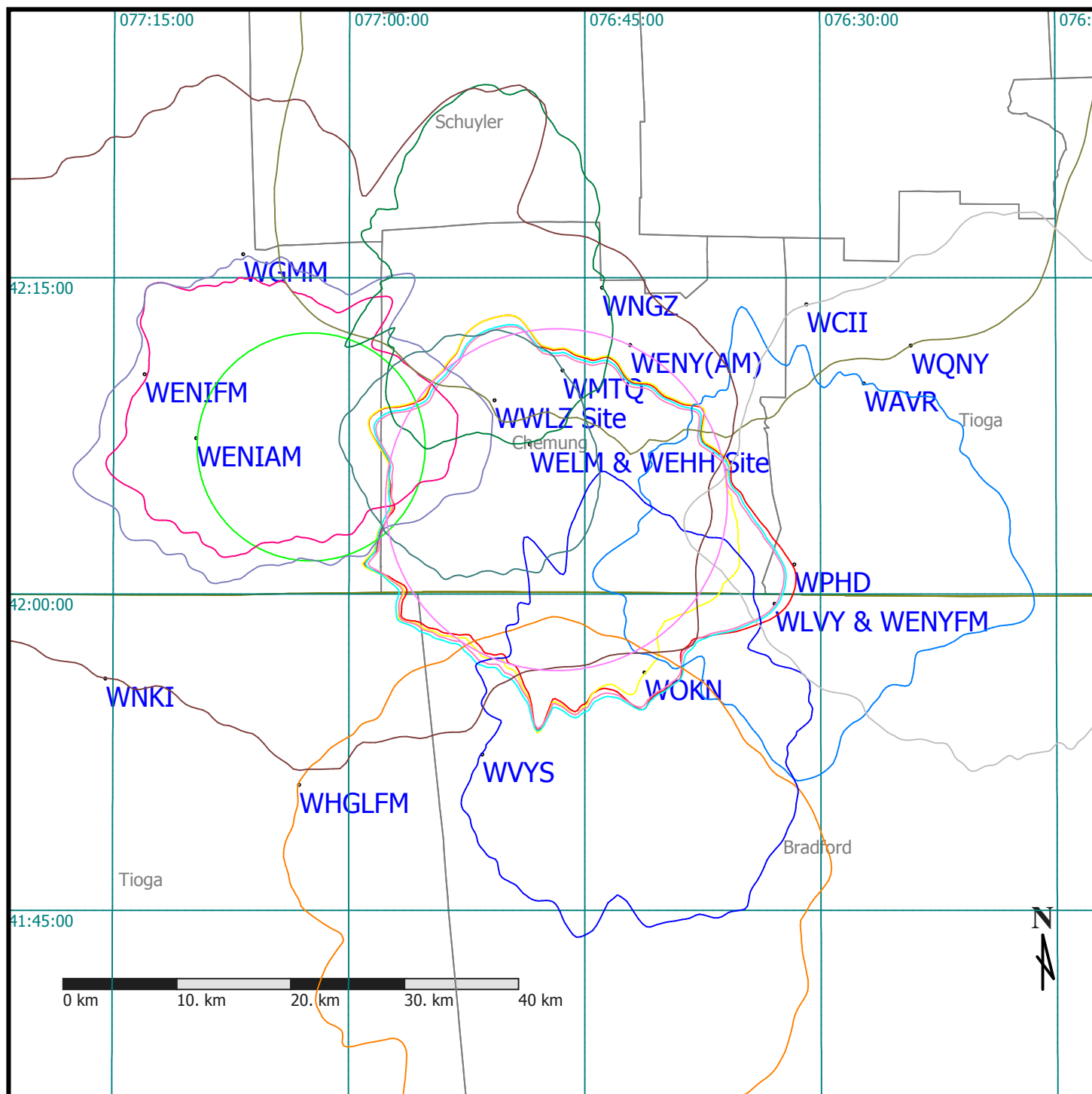
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OWNERSHIP EXHIBIT 3

RADIO MARKET TABULATIONS

AM Stations

- |    |      |     |          |     |                    |    |
|----|------|-----|----------|-----|--------------------|----|
| 1. | WENY | --- | 1230 kHz | --- | Elmira, NY         | ** |
| 2. | WENI | --- | 1450 kHz | --- | Corning, NY        | ** |
| 3. | WELM | --- | 1410 kHz | --- | Elmira, NY         |    |
| 4. | WEHH | --- | 1600 kHz | --- | Elmira Heights, NY |    |
| 5. | WWLZ | --- | 820 kHz  | --- | Horseheads, NY     |    |

FM Stations

- |     |         |     |        |     |                   |    |
|-----|---------|-----|--------|-----|-------------------|----|
| 6.  | WPHD    | --- | CH 241 | --- | South Waverly, PA | ** |
| 7.  | WENI-FM | -   | CH 249 | --- | Big Flats, NY     | ** |
| 8.  | WGMM    | --- | CH 254 | --- | Corning, NY       | ** |
| 9.  | WENY-FM | -   | CH 224 | --- | Elmira, NY        | ## |
| 10. | WNKI    | --- | CH 291 | --- | Corning, NY       |    |
| 11. | WHGL-FM | -   | CH 262 | --- | Canton, PA        |    |
| 12. | WVYS    | --- | CH 245 | --- | Ridgebury, PA     |    |
| 13. | WOKN    | --- | CH 258 | --- | Southport, NY     |    |
| 14. | WLVY    | --- | CH 232 | --- | Elmira, NY        |    |
| 15. | WCII    | --- | CH 203 | --- | Spencer, NY       |    |
| 16. | WQNY    | --- | CH 279 | --- | Ithaca, NY        |    |
| 17. | WNGZ    | --- | CH 285 | --- | Montour Falls, NY |    |
| 18. | WAVR    | --- | CH 271 | --- | Waverly, NY       |    |
| 19. | WMTQ    | --- | CH 201 | --- | Elmira, NY        |    |

TOTAL NUMBER OF STATIONS IN STUDY --- 19

\*\* --- Subject Station.

## --- Station being assigned simultaneous to this assignment.