



## ENGINEERING EXHIBIT

### MULTIPLE OWNERSHIP STUDY OF THE PROPOSED ACQUISITION OF WTRW(FM), TWO RIVERS, WISCONSIN MIDWEST COMMUNICATIONS, INC.

This statement and attached figures have been prepared on behalf of Midwest Communications, Inc., by B. Benjamin Evans, P.E. of Evans Associates, Consulting Communications Engineers in Thiensville, Wisconsin. Midwest proposes to acquire station WTRW(FM) in Two Rivers, Wisconsin. The multiple ownership study presented herein demonstrates that the proposed acquisition is in compliance with §73.3555 of the FCC Rules.

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The following stations are owned or proposed to be acquired by Midwest Communications in northeast Wisconsin:

WTRW(FM), Ch. 246A, Two Rivers, WI  
WIXX(FM), Ch. 266C, Green Bay, WI  
WNFL(AM), 1440 KHz, Green Bay, WI  
WTAQ(AM), 1360 KHz, Green Bay, WI  
WHBL(AM), 1330, Sheboygan, WI  
WNCY-FM, Ch. 262C2, Neenah-Menasha, WI  
WROE(FM), Ch. 232C3, Neenah-Menasha, WI  
WOZZ(FM), Ch. 228C2, New London, WI  
WXER(FM), Ch. 283A, Plymouth, WI  
WBFM(FM), Ch. 229A, Sheboygan, WI  
WHBZ(FM), Ch. 293A, Sheboygan Falls, WI  
WZBY(FM), Ch. 259C2, Sturgeon Bay, WI

Since some of these stations have overlapping principal community contours (5 mV/m for AM stations, 70 dBu for FM stations), a multiple ownership study has been prepared in accordance with §73.3555 of the FCC Rules.

The community contours of all of the above stations are shown in attached map entitled Community Contours of WTRW and Midwest Stations in Northeast Wisconsin.



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*Midwest Communications, Inc.*

### **Radio Market**

With the acquisition of WTRW, the radio market defined by mutually-overlapping community contours of Midwest stations that require analysis under §73.3555 is defined by WTRW(FM), WIXX(FM), WNFL(AM), WTAQ(AM) and WHBL(AM).

Since the defined market involves only five commonly-owned stations, no more than three stations in the same service, under §73.3555(a)(1)(iv), the common ownership of five stations in each market is permissible, regardless of the total number of stations in the market, as long as the number of stations owned is 50% or less of the total stations in the market. Thus, if there are at least five other commercial or non-commercial stations in the market that are not owned by Midwest, the proposed acquisition is permitted under §73.3555.

Attached is a map entitled Non-Midwest Stations Overlapping WTRW, WIXX, WNFL, WTAQ and WHBL showing the contours of non-Midwest stations that place a predicted community-grade signal (5 mV/m for AM stations, 70 dBu for FM stations) into the contour any of these stations.

The following non-Midwest stations are in the market:

1. WAPL-FM, Ch. 289C, Appleton, WI
2. WPNE-FM, Ch. 207C1, Green Bay, WI
3. WZOR(FM), Ch. 234C3, Mishicot, WI
4. WORQ(FM), Ch. 211C2, Green Bay, WI
5. WLTU(FM), Ch. 221A, Manitowoc, WI
6. WQTC-FM, Ch. 272A, Manitowoc, WI
7. WGBW(AM), 1590 KHz, Two Rivers, WI

Therefore, in this market, the Midwest stations (the existing ones together with WTRW) represent less than 50% of the total stations in the market, and thus the proposed acquisition is in compliance with §73.3555.

Distances to the AM station contours were calculated using the antenna radiation patterns contained in the FCC AM antenna parameter database for those stations, the ground wave prediction method described in §73.184 of the FCC Rules, and the Ground Wave Field Strength versus Distance Graphs of §73.184. Ground conductivities used in the calculations were from FCC Figure M-3. Distances were calculated every five degrees azimuth.



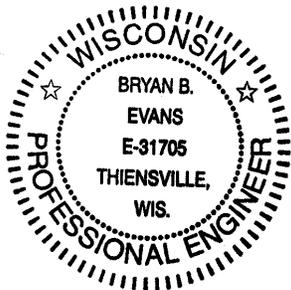
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Distances to the FM station contours were calculated using the method described in §73.313 of the FCC Rules. Terrain data was derived from the USGS 30-second database. Calculations were made every degree azimuth.

This statement, the attachments, and all calculations were prepared by the undersigned and are true and accurate to the best of my knowledge and belief.

Respectfully submitted,

B. Benjamin Evans, P.E.  
Consulting Engineer



April 14, 2008



## Non-Midwest Stations Overlapping WTRW, WIXX, WNFL, WTAQ and WHBL

**WTRW**  
 BLH-20080304ACF  
 Latitude: 44-10-24 N  
 Longitude: 087-33-38 W  
 ERP: 6.00 kW  
 Channel: 246  
 Frequency: 97.1 MHz  
 AMSL Height: 262.0 m  
 Elevation: 192.0 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model: FCC

**Contour Key:**

- 1 - WTRW(FM)
- 2 - WIXX(FM)
- 3 - WNFL(AM)
- 4 - WTAQ(AM)
- 5 - WHBL(AM)
- 6 - WAPL-FM
- 7 - WPNE-FM
- 8 - WZOR(FM)
- 9 - WORQ(FM)
- 10 - WLTU(FM)
- 11 - WQTC-FM
- 12 - WGBW(AM)

