

**RADIO MARKET ANALYSIS**  
**MILLER COMMUNICATIONS, INC.**  
**WQKI-FM RADIO STATION**  
**CH 239A - 95.7 MHZ - 4.0 KW**  
**ORANGEBURG, SOUTH CAROLINA**  
**April 2015**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf of Miller Communications, Inc. ("Miller"), licensee of WQKI-FM, Channel 239A, Orangeburg, South Carolina. Miller is making changes in the WQKI-FM facility thereby triggering this Radio Market Analysis to determine compliance with §73.3555 of the Commission's multiple ownership rules. Miller is also the licensee of FM Stations: WFRK, Channel 237A, Quinby, South Carolina; WGFG, Channel 287C3, Branchville, South Carolina; WIBZ, Channel 238A, Wedgefield, South Carolina; WSCZ, Channel 230C3, Winnsboro, South Carolina; WSIM, Channel 229A, Lamar, South Carolina; WWBD, Channel 234C3, Sumter, South Carolina; and WWKT-FM, Channel 257C3, Kingstree, South Carolina, as well as AM Stations: WDKD, 1310 kHz, Kingstree, South Carolina; WDXY, 1240 kHz, Sumter, South Carolina; WHYM, 1260 kHz, Lake City, South Carolina; WOLH, 1230 kHz, Florence, South Carolina; and WWHM, 1290 kHz, Sumter, South Carolina. WQKI-FM is not located within a metro market, nor is it home to any metro market; therefore, this review will verify compliance of commonly owned stations in a non-rated market.

2. Exhibit #1 is a map of South Carolina showing the 70 dBu contours of Miller's FM stations<sup>1</sup> and the 5.0 mV/m contours of Miller's AM stations. Changes to WQKI-FM impact

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1) All FM contours calculated using NED 03 Second Terrain Data.

only one contour overlap market. Radio Market #1 consists of FM stations WQKI-FM and WGFG.

### **CONTOUR OVERLAP REVIEW - RADIO MARKET #1**

3. Radio Market #1 is made up of FM Stations WQKI-FM and WGFG. The city grade contours of the two subject stations WQKI-FM and WGFG.

4. Radio Market #1 combined contours will be used to determine the number of other stations in the market to which the number of subject stations in each market will be added to reach the total number of stations in or providing service to the respective markets. No stations with transmitters located more than 92.0 kilometers from the boundary of the common overlap of the subject stations will be considered. Further, no other facility controlled by Miller will be considered as a market contributor unless it is a subject station in the radio market under study.

5. Exhibit #2 is a depiction of the AM and FM stations (commercial and non-commercial) providing service to the Radio Market #1 boundary. There are eleven other stations depicted. Exhibit #3 is a tabulation of the stations in Radio Market #1. There is a total of thirteen shown in the market, including the two subject stations. The number of stations indicated falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At this level, common ownership or control of up to five commercial stations with no more than three in the same service, is permissible. Therefore, Miller is in compliance in Radio Market #1.

6. Based on the compliance shown in non-rated market, the proposed changes to WQKI-FM are in compliance with §73.3555 of the Commission's rules, with regard to the markets reviewed.

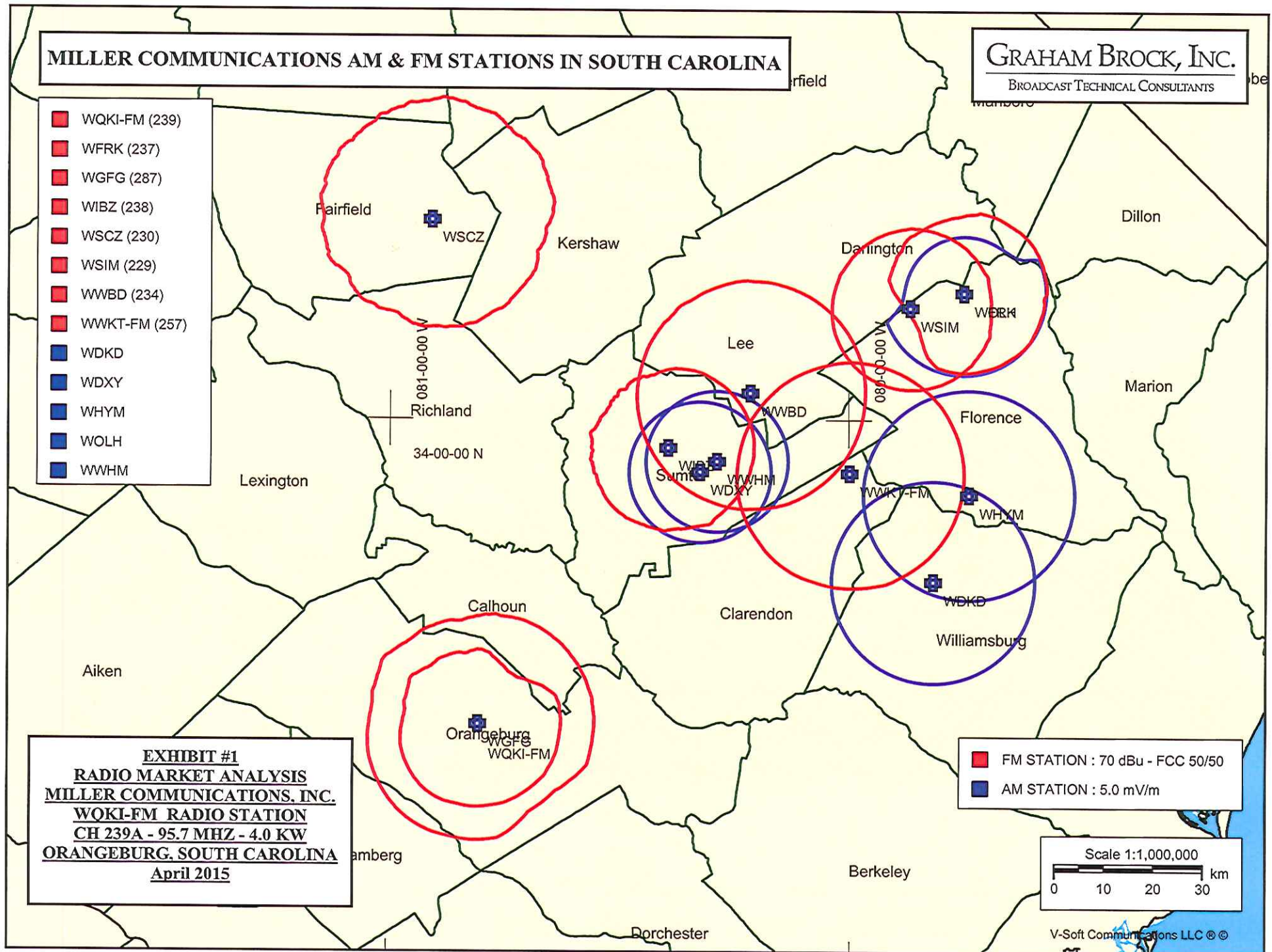
7. The foregoing technical statement was prepared on behalf of Miller Communications, Inc. by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.6 BIA database. Technical data related to AM and FM facilities was extracted from the Commission's CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

# MILLER COMMUNICATIONS AM & FM STATIONS IN SOUTH CAROLINA

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

- WQKI-FM (239)
- WFRK (237)
- WGFG (287)
- WIBZ (238)
- WSCZ (230)
- WSIM (229)
- WWBD (234)
- WWKT-FM (257)
- WDKD
- WDXY
- WHYM
- WOLH
- WWHM



**EXHIBIT #1**  
**RADIO MARKET ANALYSIS**  
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■ FM STATION : 70 dBu - FCC 50/50  
 ■ AM STATION : 5.0 mV/m

Scale 1:1,000,000  
 0 10 20 30 km

V-Soft Communications LLC ©



### RADIO STATIONS CONTRIBUTING TO THE RADIO MARKET

**GRAHAM BROCK, INC.**  
BROADCAST TECHNICAL CONSULTANTS

BROADCAST TECHNICAL CONSULTANTS

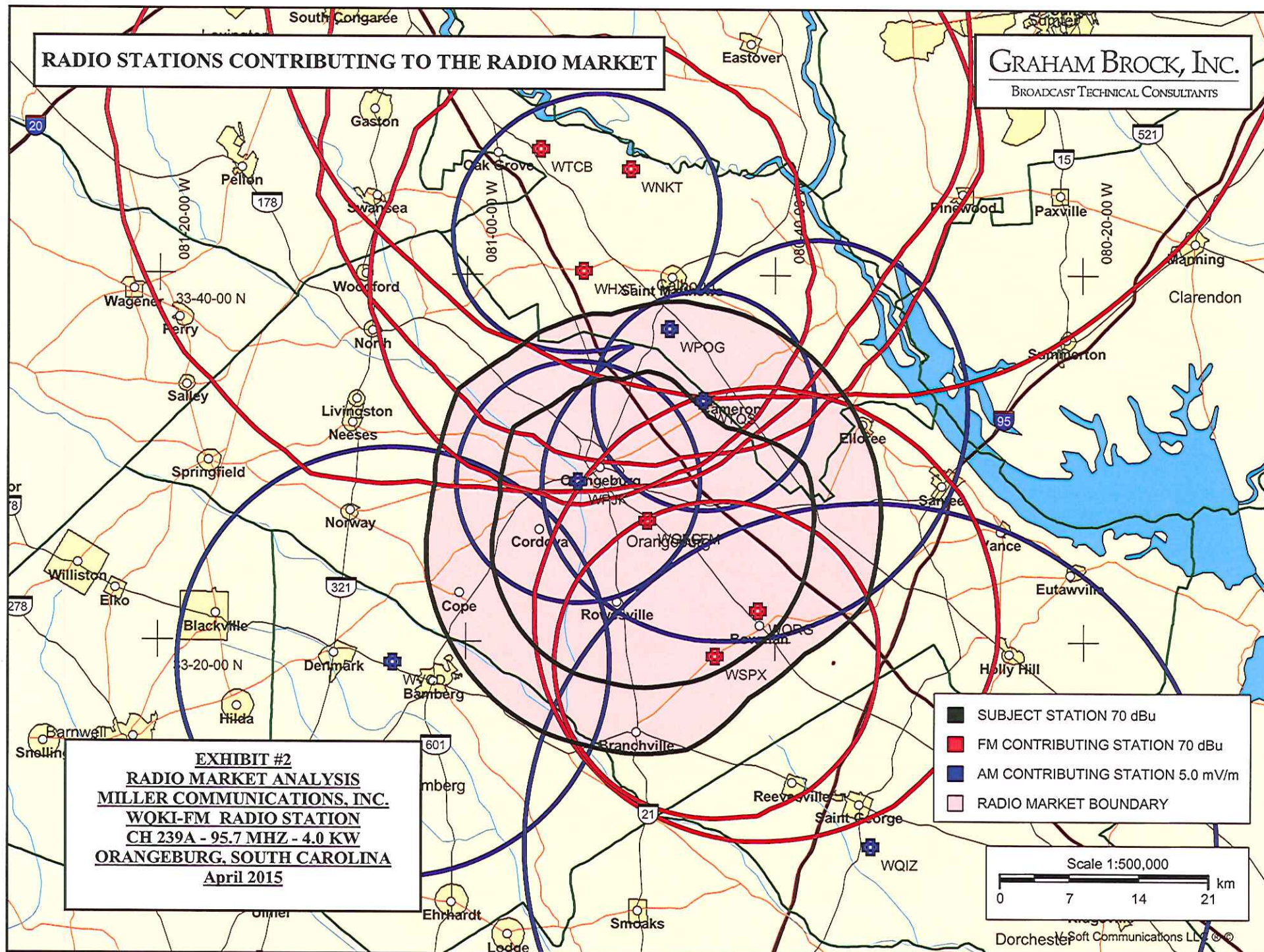






EXHIBIT #2  
RADIO MARKET ANALYSIS  
MILLER COMMUNICATIONS, INC.  
WQKI-FM RADIO STATION  
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ORANGEBURG, SOUTH CAROLINA  
April 2015

 SUBJECT STATION 70 dBu  
 FM CONTRIBUTING STATION 70 dBu  
 AM CONTRIBUTING STATION 5.0 mV/m  
 RADIO MARKET BOUNDARY

Scale 1:500,000

0 7 14 21 km

A horizontal number line representing distance in kilometers. It is marked with 0, 7, 14, and 21. The segments between the marks are labeled with their lengths: 3 km between 0 and 3, 4 km between 3 and 7, 5 km between 7 and 12, and 3 km between 12 and 15. The line ends at 21 km.

Dorchester V-Soft Communications LLC (R) (C)

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**EXHIBIT #3**

**Tabulation of Stations in Radio Market #1**

Total number of overlapping contours: 13

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WQKI-FM	FM	239A	Orangenburg	SC	Proposed	0.0	0.0
WGFG	FM	287C3	Branchville	SC	BLH20091216ACT	0.0	0.0

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WSPX	FM	233A	Bowman	SC	BLH20040818AAI	15.2	153.4
WORG	FM	262C3	Elloree	SC	BLH19921214KB	14.3	129.0
WWDM	FM	267C	Sumter	SC	BMLH19980925KB	68.4	9.5
WHXT	FM	280C3	Orangenburg	SC	BMLH20070719ACG	26.0	345.7
WTCB	FM	294C1	Orangenburg	SC	BMLH19981203KA	39.0	344.0
WNKT	FM	298C2	Eastover	SC	BLH20071120AJA	35.5	357.2
WPJK	AM	1580	ORANGEBURG	SC	BL	8.0	299.5
WQIZ	AM	810	ST. GEORGE	SC	BML20090514ADC	39.7	145.5
WPOG	AM	710	ST. MATTHEWS	SC	BML20050616AEO	19.5	6.5
WTQS	AM	1490	CAMERON	SC	BL20080829ABL	13.4	24.9
WVCD	AM	790	BAMBERG-DENMARK	SC	BL	29.3	240.8

Distance and bearing calculations from coordinates: 33-26-35 N, 080-48-16 W

Duopoly Options:

TV: Not Included

FM: 3.16 mV/m (70 dBu)

AM: 5.0 mV/m

Stations more than 92 km from the common area were excluded.



**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

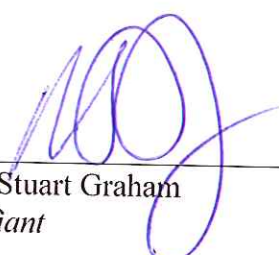
*State of Georgia    )*  
*St. Simons Island    ) ss:*  
*County of Glynn    )*

**R. STUART GRAHAM**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Miller Communications, Inc., to prepare the attached Technical Exhibit.

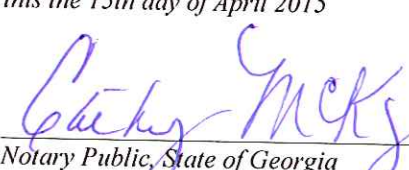
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 15th day of April 2015.*

  
\_\_\_\_\_  
R. Stuart Graham  
*Affiant*

*Sworn to and subscribed before me  
this the 15th day of April 2015*

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: March 12, 2019