

Radiotechniques

402 Tenth Ave. • PO Box 367 • Haddon Heights, NJ 08035-0367

Engineering Statement - Amended

Multiple Ownership
Washington, DC Area
January 2002

Radiotechniques Engineering Corp. has been retained to determine the acceptability for common ownership of several AM broadcasting stations in the Washington DC area in support of the FCC application to acquire WPLC, Silver Spring, MD, with respect to Federal Communications Commission Rules and Regulations §73.3555.

The attached map shows the 5.0 mV/m contours of AM Stations WKDM, Rockville, MD, WPLC, Silver Spring, MD, WZHF, Arlington, VA, WKDV, Manassas, VA, and WKCW, Warrenton, VA. These stations are proposed to be co-owned.

The file WashingtonServiceDay.pdf is a map showing the 5.0 mV/m contours of each of the above stations. As can be seen, the 5.0 mV/m contour of WKCW and the 5.0 mV/m contour of WKDV do not overlap WPLC, WKDM nor WZHF. These stations do not effect the eligibility of ownership of WPLC.

The 5.0 mV/m contour of WPLC overlaps the 5.0 mV/m contours of WKDM and WZHF, but WKDM and WZHF do not overlap each other. The number of stations that are to be considered for multiple ownership is two, as WKDM and WZHF overlap WPLC, but WKDM does not overlap WZHF.

To meet the multiple ownership requirements of FCC Rules and Regulations for two stations with overlapping 5.0 mV/m contours, it is necessary that there be at least five stations in the market. There are many stations in this market; a study of what stations overlap WPLC, WKDM and WZHF was undertaken. The file WashingtonAM.pdf is a series of maps showing the 5.0 mV/m contours of the WKDM, WPLC and WZHF in red, with the 5.0 mV/m contours of other stations shown in green and black. The following stations overlap WKDM, WZHF and WPLC:

Page 1	WABS, Arlington, VA WCTN, Potomac, MD WFAX, Falls Church, VA (Partial)	WACA, Wheaton, MD WDCT, Fairfax, VA (Partial)
Page 2	WMAL, Washington, DC WMET (CP), Gaithersburg, MD	WILC, Laurel, MD WKDL, Alexandria, VA
Page 3	WPGC, Morningside, MD WTNT, Bethesda, MD	WTEM, Washington, DC WTOP, Washington, DC
Page 4	WUST, Washington, DC WWTL, Poolesville, MD	WWRC, Washington, DC WYCB, Washington, DC

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There are many FM Stations that overlap the 5.0 mV/m contours of the subject stations, however this report has demonstrated that there are 17 AM stations in the market, well above the requirements for the proposed acquisition.

Additionally, a study of the FM stations in the market was undertaken. The file WashFM.pdf contains a number of maps showing the 5.0 mV/m contours of WKDM, WPLC and WZHF. The first page also shows the 3.16 mV/m contours of area FM stations whose city grade contour overlaps all three station's 5.0 mV/m principal community contours. These stations are:

WAMU, Washington, DC	WARW, Bethesda, MD
WASH, Washington, DC	WAVA, Arlington, VA
WETA, Washington, DC	WGMS-FM, Washington, DC
WHUR-FM, Washington, DC	WIHT, Washington, DC
WKYS, Washington, DC	WMZQ-FM, Washington, DC
WRQX, Washington, DC	WPFW, Washington, DC
WWDC-FM, Washington, DC	

The second and third pages show WKDM, WPLC and WZHF along with the 3.16 mV/m contour of FM stations which partially overlap the combination. The stations shown overlapping on these maps are:

WCSP-FM, Washington, DC	WBIG-FM, Washington, DC
WGTS, Takoma Park, MD	WHFS, Annapolis, MD
WJFK-FM, Manassas, VA	WJZW, WoodBridge, VA
WMMJ, Bethesda, MD	WPGC-FM, Morningside, MD

This study shows that there are 21 FM stations that overlap the principal community contours of the proposed combination of WKDM, WPLC and WZHF.

The total number of stations in the market are:

WPLC, WKDM and WZHF	3
Other AM stations	17
FM stations	<u>21</u>
Total	41 Stations

This report shows that there are 41 stations in the radio market as defined in Federal Communications Commission Rules and Regulations §73.3555(a)(1). Which permit up to eight stations, of which five may be in the same service. WPLC overlaps WKDM and WZHF, but WKDM and WZHF do not overlap each other, so the total count is two. This combination is clearly permitted under §73.3555(a)(1)

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This is to certify that this report has been prepared by myself, and under my direction. It is correct and accurate of my own knowledge, except where stated otherwise, and where this is so, the information is correct to the best of my knowledge and belief.

I further certify that I am a Licensed Professional Engineer in the State of New Jersey, with a BSEE degree from the Newark College of Engineering of NJIT, and that I am regularly engaged in the practice of radio engineering with the firm of Radiotechniques Engineering Corporation, with offices at 402 Tenth Avenue, Haddon Heights, NJ. I am a member of the AFCCE, senior member of the IEEE, and SBE, and hold a FCC General Radiotelephone Operator License, and am Certified as a Senior Broadcast Engineer by the SBE. My qualifications are a matter of record with the FCC.



Date: January 2, 2002

Edward A. Schober, PE