

EXHIBIT 5
(Page 1 of 9)

MULTIPLE OWNERSHIP CONSIDERATIONS

Rubber City Radio Group, Inc.
Charlotte, MI

WJZL has attributable common ownership with three other nearby stations:

WQTX	St. Johns, MI	Channel 221A
WVIC	Jackson, MI	Channel 231B
WJXQ	Charlotte, MI	Channel 291B

According to Version 4.0 of the BIA Financial Network's *Media Access Pro* computer software,¹ all four of these stations are considered to be "home" to the Lansing-East Lansing, Michigan metro market, which, according to BIA, includes a total of 25 stations. Table 5.0 presents a list of the stations which are considered by BIA to be "home" to this market. As outlined in Section 73.3555(a)(1)(iii) of the FCC Rules, common ownership of up to six stations is permitted in markets containing 15 through 29 stations, so long as no more than four of these stations are in the same service. The instant situation involves the common ownership of four FM stations in this metro market, which does not exceed the permitted maximum

Although WVIC is considered to be "home" to this metro market, Jackson, its community of license is located wholly outside the geographic boundaries of this metro market. For this reason, as required by Paragraph 286 of the FCC's July 2, 2003 *Report and Order and Notice of Proposed Rulemaking* in MB Dockets 02-277, 01-235, 01-317, 00-244, and 03-130, contour overlap studies were also conducted² for the market defined by the principal community contour overlap between the proposed WJZL facilities and WVIC . Figure 5.1 is a map exhibit depicting the principal community contour for

¹The program databases utilized in this analysis were most recently updated on September 28, 2006.

²These contour overlap studies were conducted utilizing the modified contour overlap methodology outlined in Paragraph 285 of the FCC's July 2, 2003 *Report and Order and Notice of Proposed Rulemaking* in MB Dockets 02-277, 01-235, 01-317, 00-244, and 03-130.

EXHIBIT 5
(Page 2 of 9)

the proposed WJZL facilities in relation to the principal community contours for WVIC, WQTX, and WJXQ. The 3.16 mV/m contours for these four stations were projected using terrain data extracted from the NGDC 30 second terrain database.

As shown in this figure, there is an area of common principal community contour overlap between the proposed WJZL facilities, WVIC, and WJXQ. This figure also shows that the WQTX principal community contour does not overlap this area of common principal community contour overlap. For this reason, WQTX is not considered to be a commonly owned station in the contour based market formed by WJZL, WVIC, and WJXQ.

Figure 5.2 shows the composite principal community contour for the contour based market formed by WJZL, WVIC, and WJXQ. Also shown in this figure are the transmitter sites of all operating stations located within this composite contour. Table 5.2 is a tabulation of the stations depicted in this figure. As shown by this data, there are 30 stations, including WJZL, WVIC, and WJXQ, whose transmitter sites are located within this composite principal community contour. Thus, it can be safely said that there are at least 30 stations in the contour based market defined by the principal community contours of these three stations. In fact, the number of stations in this market would be even greater if stations located outside this composite contour whose principal community contours overlap this composite contour were included in this total. No such further analysis is required in this case, however, since, in markets containing 30 through 44 stations, Section 73.3555(a)(1)(ii) of the FCC Rules permits the common ownership of up to 7 commercial stations, no more than four of which are in the same service. The instant situation involves the common ownership of three FM stations in this contour

EXHIBIT 5
(Page 3 of 9)

based market, which does not exceed the permitted maximum. Based on the above information, the proposed WJZL facilities will fully comply with the FCC's local radio ownership rule.

TABLE 5.0

STATIONS CONSIDERED BY BIA
TO BE HOME TO THE LANSING-
EAST LANSING, MICHIGAN METRO MARKET

Rubber City Radio Group, Inc.
Grand Ledge, MI

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
1	WVFN	730	East Lansing, MI
2	WKAR	870	East Lansing, MI
3	WUNN	1110	Mason, MI
4	WXLA	1180	Dimondale, MI
5	WJIM	1240	Lansing, MI
6	WILS	1320	Lansing, MI
7	WLCM	1390	Charlotte, MI
8	WWSJ	1580	St. Johns, MI
9	WLGH	201A	Leroy Township, MI
10	WJOM	203A	Eagle, MI
11	WDBM	205A	East Lansing, MI
12	WLNZ	209A	Lansing, MI
13	WOCR	219A	Olivet, MI
14	WKAR-FM	213B	East Lansing, MI
15	WOES	217A	Ovid-Elsie, MI
16	WQTX	221A	St. Johns, MI
17	WJZL	225A	Grand Ledge, MI
18	WVIC	231B	Jackson, MI
19	WMMQ	235B	East Lansing, MI
20	WQHH	243A	Dewitt, MI
21	WJIM-FM	248B	Lansing, MI
22	WFMK	256B	East Lansing, MI
23	WITL-FM	264B	Lansing, MI

TABLE 5.0 (cont'd)

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
24	WHZZ	269A	Lansing, MI
25	WJXQ	291B	Charlotte, MI

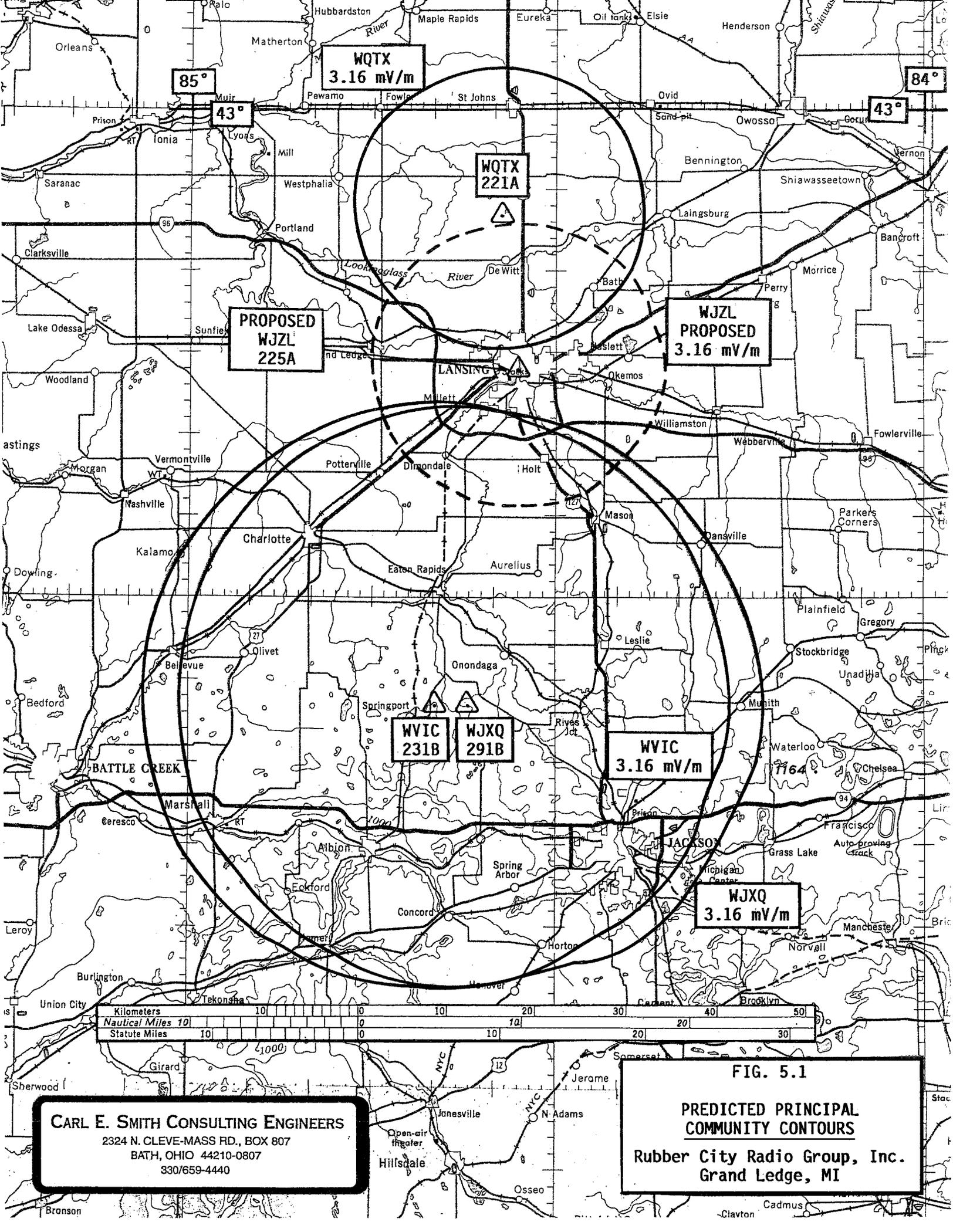


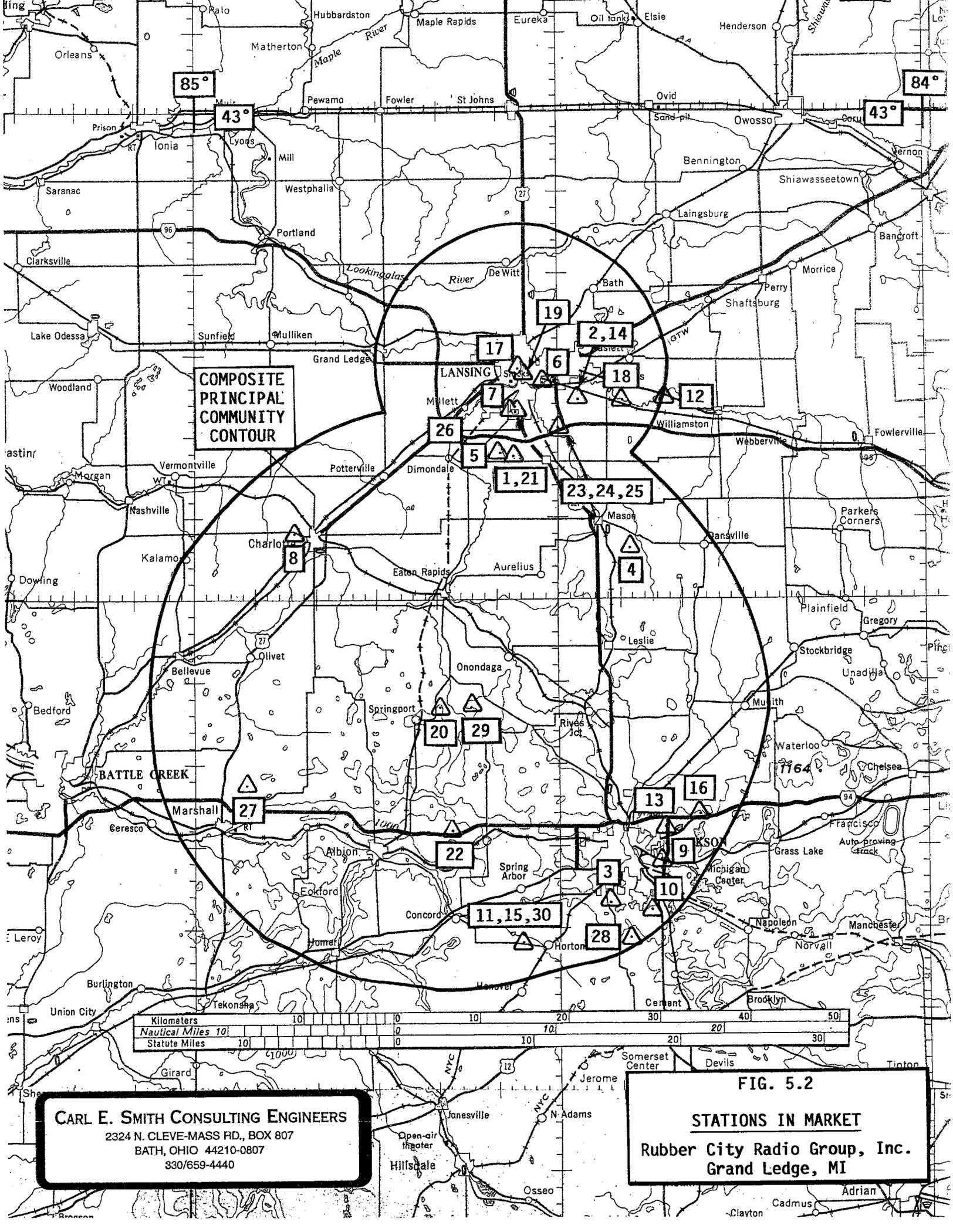
FIG. 5.1

**PREDICTED PRINCIPAL
COMMUNITY CONTOURS**

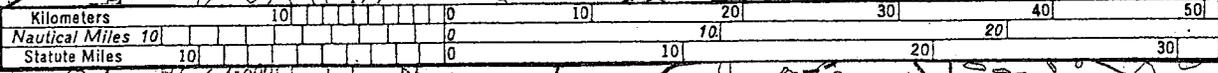
**Rubber City Radio Group, Inc.
Grand Ledge, MI**

CARL E. SMITH CONSULTING ENGINEERS

2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440



**COMPOSITE
PRINCIPAL
COMMUNITY
CONTOUR**



CARL E. SMITH CONSULTING ENGINEERS
 2324 N. CLEVE-MASS RD., BOX 807
 BATH, OHIO 44210-0807
 330/659-4440

FIG. 5.2
STATIONS IN MARKET
 Rubber City Radio Group, Inc.
 Grand Ledge, MI

TABLE 5.2

STATIONS IN MARKET
 Rubber City Radio Group, Inc.
 Grand Ledge, MI

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
1	WVFN	730	East Lansing, MI
2	WKAR	870	East Lansing, MI
3	WKHM	970	Jackson, MI
4	WUNN	1110	Mason, MI
5	WXLA	1180	Dimondale, MI
6	WJIM	1240	Lansing, MI
7	WILS	1320	Lansing, MI
8	WLCM	1390	Charlotte, MI
9	WIBM	1450	Jackson, MI
10	WJKN	1510	Jackson, MI
11	KTGG	1540	Spring Arbor, MI
12	WLGH	201A	Leroy Township, MI
13	WJKQ	203A	Jackson, MI
14	WDBM	205A	East Lansing, MI
15	WJKN-FM	207A	Spring Arbor, MI
16	WJCQ	209A	Jackson, MI
17	WLNZ	209A	Lansing, MI
18	WKAR-FM	213B	East Lansing, MI
19	WJZL	225A	Grand Ledge, MI
20	WVIC	231B	Jackson, MI
21	WMMQ	235B	East Lansing, MI
22	WUFN	244A	Albion, MI
23	WJIM-FM	248B	Lansing, MI

TABLE 5.2 (cont'd)

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
24	WFMK	256B	East Lansing, MI
25	WITL-FM	264B	Lansing, MI
26	WHZZ	269A	Lansing, MI
27	WWKN	285A	Marshall, MI
28	WKHM-FM	287A	Brooklyn, MI
29	WJXQ	291B	Charlotte, MI
30	WSAL	295A	Spring Arbor, MI

Notes:

WJCQ is presently operating under automatic program test authority, pursuant to Section 73.1692 of the FCC Rules with the facilities authorized by construction permit BPED-19981224MB and presently has a license application (BLED-20050607ACR) on file with the FCC to cover this construction permit.