

**MULLANEY ENGINEERING, INC.**

9049 SHADY GROVE COURT  
GAITHERSBURG, MD 20877

**ENGINEERING EXHIBIT EE:**

**PROPOSED COMMON OWNERSHIP OF  
AM STATIONS - WEGO & WSVM  
WITH EXISTING OWNERSHIP OF  
AM STATIONS - WHVN, WCGC & WAME**

**AUGUST 22, 2002**

ENGINEERING STATEMENT IN SUPPORT OF  
COMPLIANCE WITH  
RADIO DUOPOLY RULES

Prepared On Behalf Of

GHB of Waxhaw, Inc.

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3. Figure 1A, Expanded Map Showing Duopoly Radio Market.

## Declaration

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested to prepare the instant engineering exhibit which demonstrates that the proposed acquisition of **AM STATIONS - WEGO & WSVM** in addition to the other AM stations controlled by GHB of Waxhaw, Inc. is in compliance with the Radio Duopoly Rules.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

/s/ John J. Mullaney  
John J. Mullaney, Consulting Engineer

Executed on the 22nd day of August 2002.

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**NARRATIVE STATEMENT:**

**I. General:**

This engineering statement has been prepared on behalf of GHB of Waxhaw, Inc. ("GHB"). The purpose of this statement is to establish that the common ownership of **AM STATIONS - WEGO & WSVM** with the existing common ownership of **AM STATIONS - WHVN, WCGC & WAME** is in compliance with the radio duopoly rules.

GHB is requesting to have some ownership interest in five AM stations (two new). However, as will be shown, neither of the two new AM stations provide city grade (5 mV/m) service to an area which also receives city grade service from one of the existing common AM stations. Consequently, common ownership of these five stations is permissible per Section 73.3555 since no new duopoly area is created.

Appendix A provides a list of the stations proposed to be under common control including their technical parameters.

## **II. Engineering Discussion:**

### **A. Market Definition:**

Section 73.3555 defines the “market” as the composite city grade coverage area of commonly owned facilities or proposals. The radio market is defined by the composite area generated by the 3.16 mV/M or the 70 dBu FM contours and by the 5.0 mV/m AM contours of all stations proposed to be under common control. GHB is requesting to have some ownership interest in five AM stations.

### **B. Compliance With Radio Duopoly Rules:**

The applicable section of 73.3555 permits the common ownership of these five stations since the two proposed to be acquired do not overlap any of the AM stations currently under common control.

**Appendix A** is a list of the technical facilities authorized to each of the five AM stations proposed to be under common ownership.

**Figure 1** is a map illustrating the city grade service contours for the five AM stations proposed to be under common ownership. As can be seen, neither of the two new AM stations provide city grade (5 mV/m) service to an area which also receives city grade service from one of the existing common AM stations. Consequently, common ownership of these five AM stations is permissible per Section 73.3555 since **no duopoly overlap area is created**. The stations proposed to be acquired have contours drawn in “blue” while the commonly owned stations are drawn in “red”. **Figure 1A** is an expanded view of the map which demonstrates the lack of overlap between WHVN & WEGO.

**C. Transmitter:**

The AM 5.0 mV/m (city) contours were determined using conductivity data from the FCC's M-3 conductivity map. The distance to the contours was determined using theoretical M-3 conductivity information. The technical information used has been obtained from the AM Engineering Data Base for August 2002.

**III. SUMMARY:**

As shown herein, common ownership of these five AM stations is permissible per Section 73.3555 since **no duopoly overlap area is created.**

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

August 22, 2002.

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**APPENDIX A:**

**LIST OF  
COMMON & NON-COMMON  
AM STATIONS  
SERVING RADIO MARKET**

**PROPOSED COMMON OWNERSHIP OF  
AM STATIONS - WEGO & WSVM  
WITH EXISTING OWNERSHIP OF  
AM STATIONS - WHVN, WCGC & WAME**

**AUGUST 22, 2002**

Prepared On Behalf Of

GHB of Waxhaw, Inc.

## COMMONLY OWNED AM STATIONS

CALL: **WHVN** LIC DAY ND2 U 1240 kHz. CLASS: 0C  
CITY: CHARLOTTE STATE: NC US  
COORDINATES: N 35-12- 0 / W 80-48-39  
# OF TOWERS: 1 POWER: 1.000 RMS: 366.93 mV/m at 1 km  
FILE NO.: BL DATA FROM: FCC REGION: C  
IFRB /DATE: /LIST: /CHANGE: 02038 /NOTIFIED: OPER

CALL: **WCGC** LIC DAY DA2 U 1270 kHz. CLASS: 0B  
CITY: BELMONT STATE: NC US  
COORDINATES: N 35-15- 5 / W 81- 3-26  
# OF TOWERS: 2 POWER: 5.000 RMS: 635.20 mV/m at 1 km  
FILE NO.: BL870929AT DATA FROM: FCC REGION: B  
IFRB /DATE: /LIST: /CHANGE: 02214 /NOTIFIED: OPER

CALL: **WCGC** **APP** DAY DA2 U 1270 kHz. CLASS: 0B  
CITY: BELMONT STATE: NC US  
COORDINATES: N 35-15- 5 / W 81- 3-26  
# OF TOWERS: 2 POWER: 10.000 RMS: 991.98 mV/m at 1 km  
FILE NO.: BP020614AAZ DATA FROM: .FCC. REGION: B  
IFRB /DATE: /LIST: /CHANGE: /NOTIFIED: PROP

CALL: **WAME** LIC DAY ND1 U 550 kHz. CLASS: 0D  
CITY: STATESVILLE STATE: NC US  
COORDINATES: N 35-47-43 / W 80-51-17  
# OF TOWERS: 1 POWER: 0.500 RMS: 200.28 mV/m at 1 km  
FILE NO.: BL DATA FROM: FCC REGION: B  
IFRB /DATE: /LIST: /CHANGE: 2930 /NOTIFIED: OPER

## NON-COMMONLY OWNED AM STATIONS

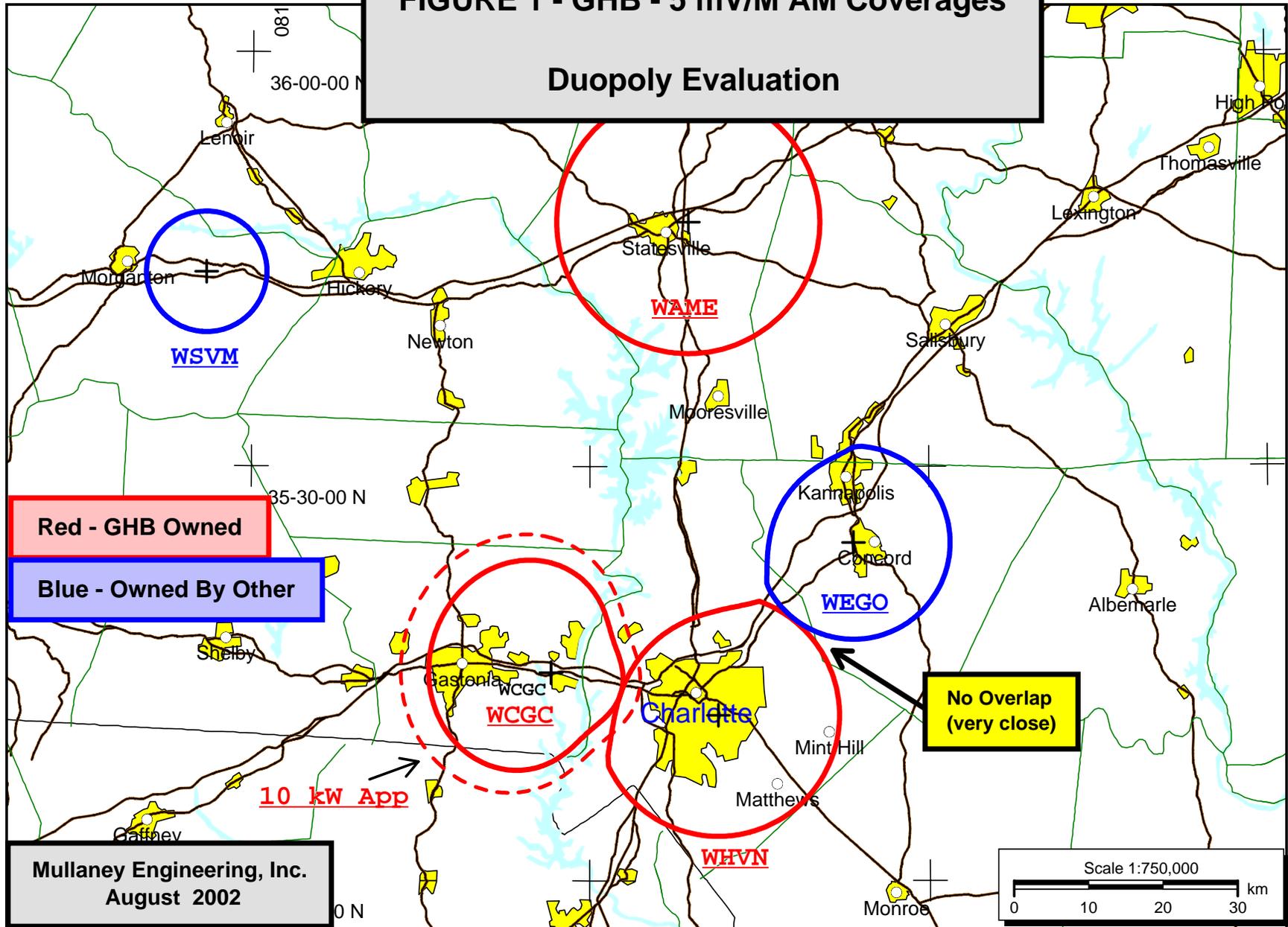
(proposed to be acquired)

CALL: **WEGO** LIC DAY ND1 U 1410 kHz. CLASS: 0D  
CITY: CONCORD STATE: NC US  
COORDINATES: N 35-24-29 / W 80-36-41  
# OF TOWERS: 1 POWER: 1.000 RMS: 307.38 mV/m at 1 km  
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IFRB /DATE: /LIST: /CHANGE: 02584 /NOTIFIED: OPER  
RECORD DATE:

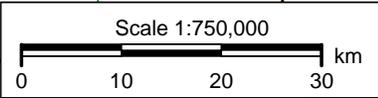
CALL: **WSVM** LIC UNL ND1 U 1490 kHz. CLASS: 0C  
CITY: VALDESE STATE: NC US  
COORDINATES: N 35-44- 3 / W 81-34- 4  
# OF TOWERS: 1 POWER: 1.000 RMS: 276.81 mV/m at 1 km  
FILE NO.: BL DATA FROM: FCC REGION: C  
IFRB /DATE: /LIST: /CHANGE: 02038 /NOTIFIED: OPER  
RECORD DATE:

**FIGURE 1 - GHB - 5 mV/M AM Coverages**

**Duopoly Evaluation**

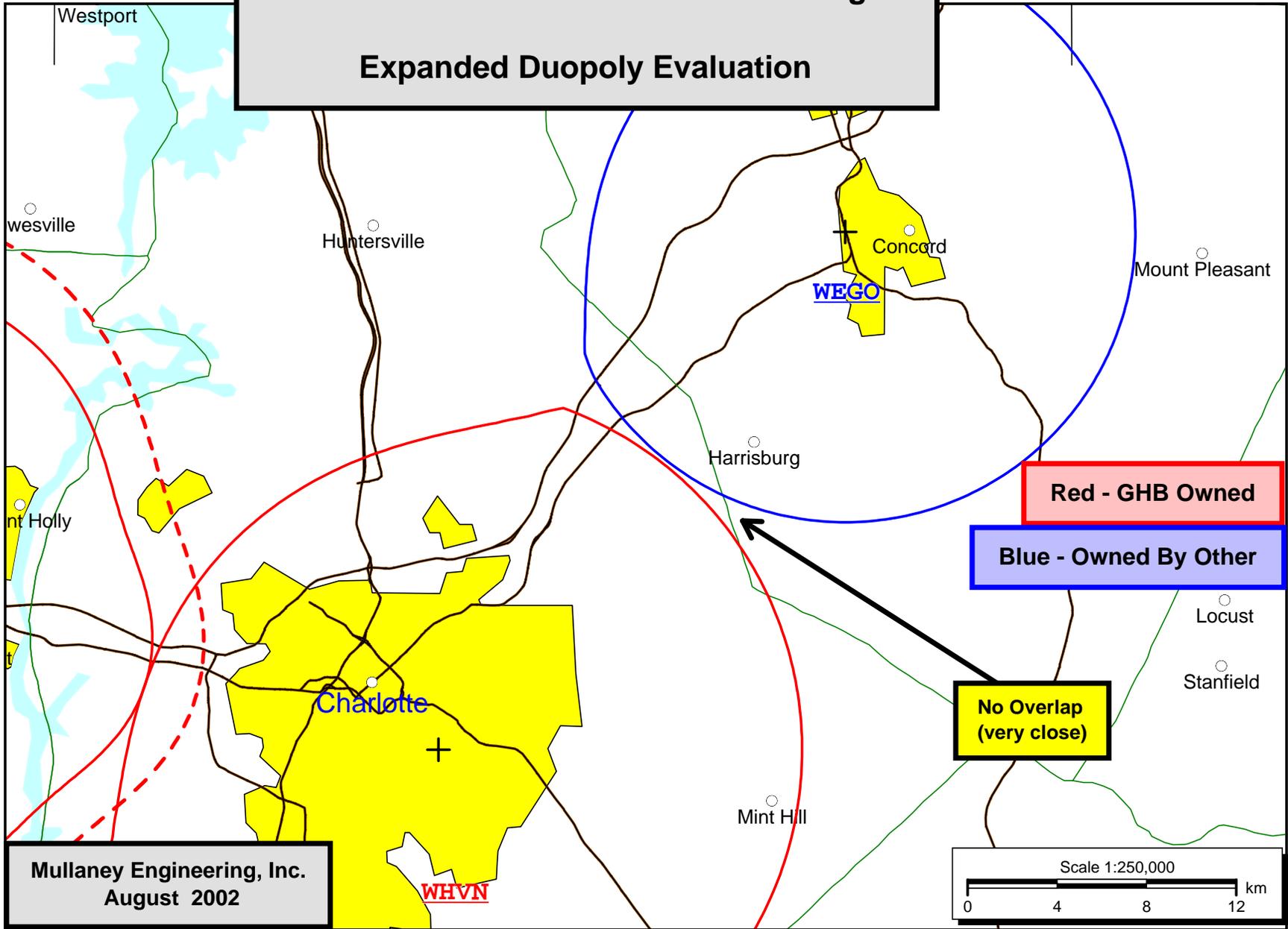


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# FIGURE 1A - GHB - 5 mV/M AM Coverages

## Expanded Duopoly Evaluation



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WHVN

WEGO

Charlotte

Mint Hill

Harrisburg

Concord

Mount Pleasant

Locust

Stanfield

Red - GHB Owned

Blue - Owned By Other

No Overlap  
(very close)

Scale 1:250,000

