

**RADIO MARKET ANALYSIS**  
**SOUTHERN COMMUNICATIONS CORP.**  
**WWNR RADIO STATION**  
**BECKLEY, WEST VIRGINIA**  
**October 2003**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Southern Communications Corp. ("Southern"), proposed assignee of WWNR, 620 kHz, Beckley, West Virginia. Principals of Southern have attributable interests in WIWS, 1070 kHz, and WCIR-FM, Channel 279B, Beckley, West Virginia; WMTD 1380 kHz, and WMTD-FM, Channel 272A, Hinton, West Virginia; WAXS, Channel 231B, Oak Hill, West Virginia; and WTNJ, Channel 290B, Mount Hope, West Virginia. The city grade contours of these facilities are shown on Exhibit #1.

2. Because of the number of stations and where the city grade contours overlap, two distinct markets are created as a result of this proposal: Radio Market #1 consists of FM stations WCIR-FM, WTNJ, WAXS and WMTD-FM and AM stations WWNR and WIWS; Radio Market #2 consists of FM stations WTNJ, WAXS and WMTD-FM and AM stations WWNR, WIWS and WMTD. Since WWNR, WTNJ and WAXS are subject stations in both radio markets, their respective contours will be used to determine the number of other commercial AM and FM stations that either have transmitter sites within, or provide coverage to, the subject stations' contours. Once this is determined, the subject stations in each of the respective markets will be added to demonstrate compliance with the Commission's rules.

3. Exhibit #2 is a depiction of the other stations within the WWNR, WTNJ and WAXS city grade/Radio Market boundary; fourteen commercial AM and FM stations are depicted, excluding the subject stations. Exhibit #3 is a tabulation of the stations in Radio Market #1 (WCIR-FM/WTNJ/WAXS/WMTD-FM/WWNR/WIWS), a total of twenty stations, including the subject stations. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.<sup>1</sup> At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.

4. Exhibit #4 is a tabulation of the stations in Radio Market #2 (WTNJ/ WAXS/WMTD-FM/WWNR/WIWS/WMTD), a total of twenty stations, including the subject stations. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.<sup>2</sup> At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.

5. Based on Southern's interests of Southern in the above referenced stations in the two separate markets, it has been demonstrated that the proposed assignment of WWNR to Southern is in compliance with the Commission's multiple ownership rules, as detailed in §73.3555 of the rules.

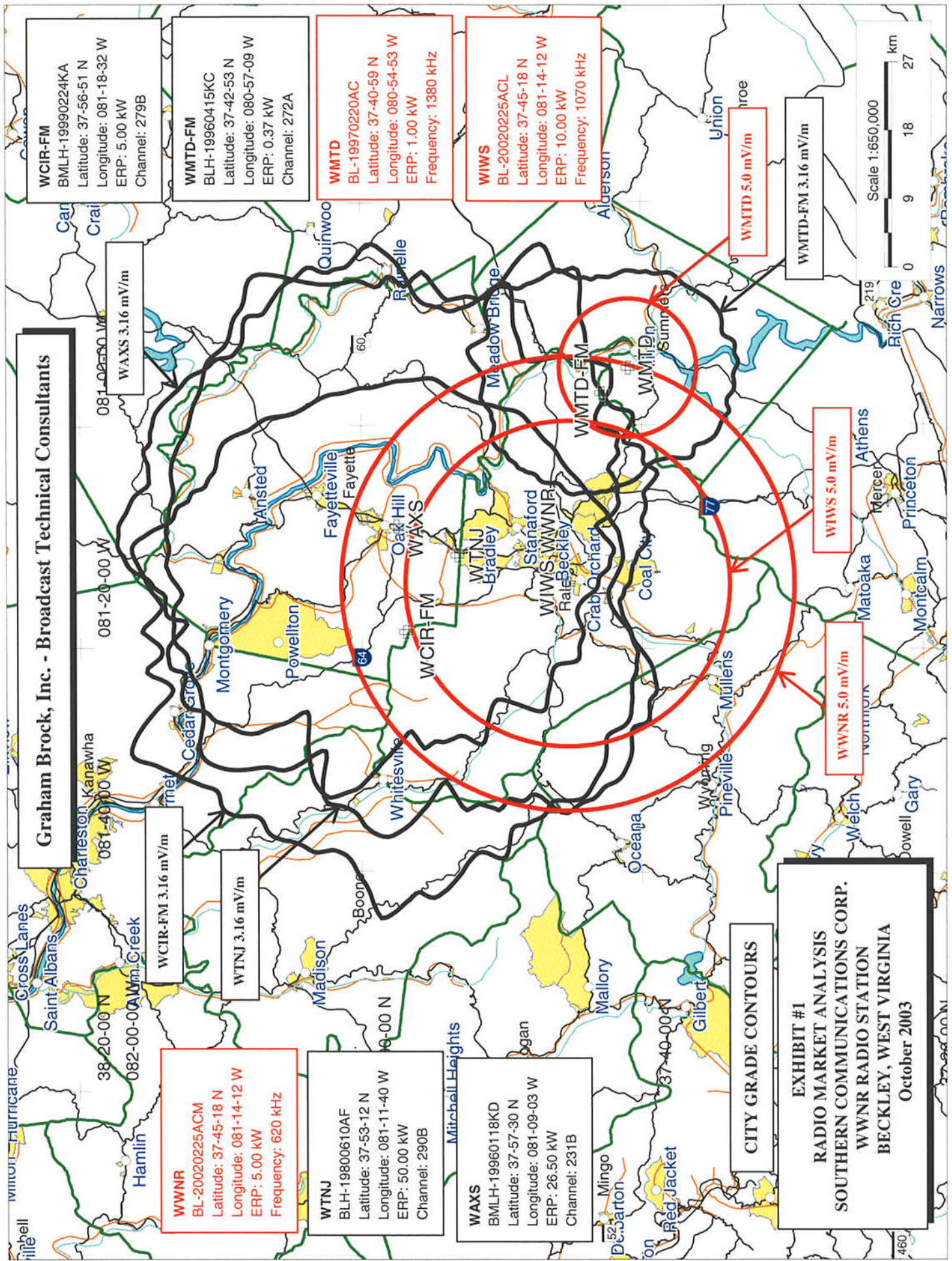
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1) Although there are additional stations providing service to the Radio Market, they are not considered since the number of stations was ample to demonstrate compliance with the rules based on the number of stations proposed to be commonly owned.

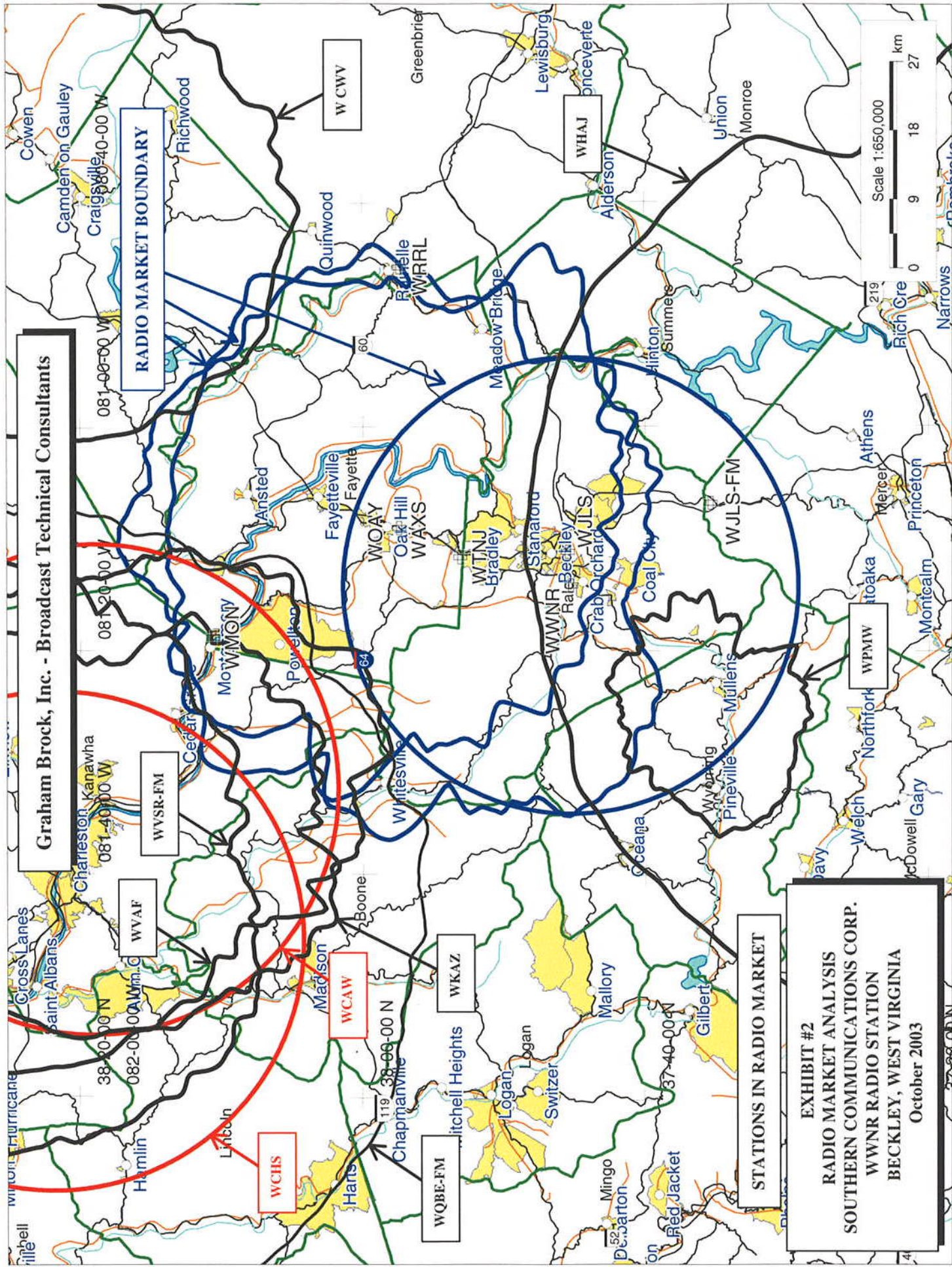
2) See Footnote 1 *supra*.

6. The foregoing technical statement was prepared on behalf of Southern Communications Corp., 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 was extracted from the CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.









Graham Brock, Inc. - Broadcast Technical Consultants

RADIO MARKET BOUNDARY

STATIONS IN RADIO MARKET

EXHIBIT #2  
RADIO MARKET ANALYSIS  
SOUTHERN COMMUNICATIONS CORP.  
WVNR RADIO STATION  
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**EXHIBIT #3**

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

**AM Stations**

	WJLS	560 kHz	Beckley, WV
+	WCHS	580 kHz	Charleston, WV
*	WWNR	620 kHz	Beckley, WV
+	WCAW	680 kHz	Charleston, WV
	WOAY	860 kHz	Oak Hill, WV
*	WIWS	1070 kHz	Beckley, WV
	WRRL	1130 kHz	Rainelle, WV
	WMON	1340 kHz	Montgomery, WV

Total AM Stations - 8

**FM Stations**

+	WPMW	Ch 224A	Mullen, WV
+	WCWV	Ch 225B	Summersville, WV
*	WAXS	Ch 231B	Oak Hill, WV
+	WQBE-FM	Ch 248B	Charleston, WV
	WJLS-FM	Ch 258B	Beckley, WV
+	WVAF	Ch 260B	Charleston, WV
*	WMTD-FM	Ch 272A	Hinton, WV
+	WVSR-FM	Ch 274B	Charleston, WV
*	WCIR-FM	Ch 279B	Beckley, WV
+	WHAJ	Ch 283C	Bluefield, WV
*	WTNJ	Ch 290B	Mount Hope, WV
+	WKAZ	Ch 297B	Miami, WV

Total FM Stations - 12

**GRAND TOTAL OF STATIONS IN RADIO MARKET #1 - 20**

- \* Subject station.
- + Provides city grade coverage to radio market.

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**EXHIBIT #4**

**Tabulation of Radio Stations in Radio Market #2**

**AM Stations**

	WJLS	560 kHz	Beckley, WV
+	WCHS	580 kHz	Charleston, WV
*	WWNR	620 kHz	Beckley, WV
+	WCAW	680 kHz	Charleston, WV
	WOAY	860 kHz	Oak Hill, WV
*	WIWS	1070 kHz	Beckley, WV
	WRRL	1130 kHz	Rainelle, WV
	WMON	1340 kHz	Montgomery, WV
*	WMTD	1380 kHz	Hinton, WV

Total AM Stations - 9

**FM Stations**

+	WPMW	Ch 224A	Mullen, WV
+	WCWV	Ch 225B	Summersville, WV
*	WAXS	Ch 231B	Oak Hill, WV
+	WQBE-FM	Ch 248B	Charleston, WV
	WJLS-FM	Ch 258B	Beckley, WV
+	WVAF	Ch 260B	Charleston, WV
*	WMTD-FM	Ch 272A	Hinton, WV
+	WVSR-FM	Ch 274B	Charleston, WV
+	WHAJ	Ch 283C	Bluefield, WV
*	WTNJ	Ch 290B	Mount Hope, WV
+	WKAZ	Ch 297B	Miami, WV

Total FM Stations - 11

**GRAND TOTAL OF STATIONS IN RADIO MARKET #2 - 20**

- \* Subject station.
- + Provides city grade coverage to radio market.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

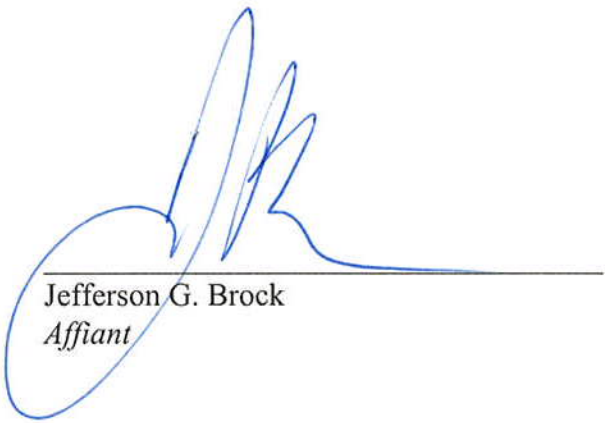
*State of Georgia    )*  
*St. Simons Island    ) ss:*  
*County of Glynn    )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Southern Communications Corp. 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 27th day of October, 2003.*



Jefferson G. Brock  
*Affiant*

*Sworn to and subscribed before me  
this the 27th day of October, 2003.*



Notary Public, State of Georgia  
My Commission Expires: April 16, 2006