

**MULLANEY ENGINEERING, INC.**

9049 SHADY GROVE COURT  
GAITHERSBURG, MD 20877  
301-921-0115 Voice  
301-590-9757 Fax  
Mullaney@MullEngr.com



**RADIO DUOPOLY COMPLIANCE  
ACQUISITION OF WMCJ AM  
by Williams Communications**

This statement was prepared at the request of Williams Communications to determine if the acquisition of WMCJ AM on 1460 kHz at Cullman, AL, along with the existing ownership of WFMH AM 1340 kHz at Cullman, AL, is in compliance with the radio duopoly rules. The city of Cullman is **not located** in an Arbitron Metro Market.

**Figure 1** is a map of the proposed duopoly market which illustrates the 5 mV/m AM ground wave contours for both WMCJ & WFMH. Both AM sites are located on the west side of Cullman and are within 0.2 km of each other.

**Figure 2** is a map which illustrates some of the other services to the duopoly market. It was determined that there are at least seven existing commercial FM facilities (all within 45 km radius of WFMH) which place a 70 dBu contour into the radio duopoly market (shaded area on map). It was not necessary to include any non-common AM stations in this analysis.

Section 73.3555 indicates that common ownership of two radio stations is permissible provided that the area is served by at least two other non-common radio stations. Based upon this the market need only consist of **four radio stations**, including the two under common control.

**Acquisition of WMCJ AM by Williams Communications resulting in a two station duopoly is in full compliance with the radio duopoly rules. The market consists of at least nine radio stations.**

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.

John J. Mullaney, Consulting Engineer

Executed on the 29th day of March 2005

# FIGURE 1 PROPOSED DUOPOLY MARKET

## Williams Communications - Cullman, Alabama

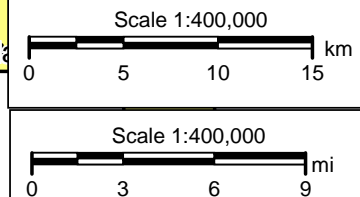
WFMH Lic  
CULLMAN AL

Latitude: 34-10-49 N  
Longitude: 086-51-59 W  
Power: 0.67 kW  
Frequency: 1340 kHz

WMCJ Lic  
CULLMAN AL

Latitude: 34-10-44 N  
Longitude: 086-51-58 W  
Power: 5.0 kW  
Frequency: 1460 kHz

COMMON STATIONS  
5 mV/m Contours



# FIGURE 2 OTHER SERVICES TO DUOPOLY MARKET

Williams Communications - Cullman, Alabama

