

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
REGENT BROADCASTING OF GRAND RAPIDS, INC.

This statement and the attached figures were prepared on behalf of Regent Broadcasting Of Grand Rapids, Inc. ("Regent"). Regent proposes the acquisition of radio station WZRZ-FM. Regent, or any other entities controlled by its parent corporation, has other nearby broadcast interests. Therefore, a multiple ownership analysis was prepared considering the following radio stations under proposed common ownership or control:

Call Sign	Location	Facilities
WFNT(AM)	Flint, MI	1470 kHz 5 kW-D 1 kW-N DA-2
WZRZ-FM	Frankenmuth, MI	CH 229A 3.5 kW 133 M
WCRZ(FM)	Flint, MI	CH 300B 50 kW 101 M
WWBN(FM)	Tuscola, MI	CH 268A 6 kW (MAX-DA) 100 M

Since these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), an ownership study has been prepared in accordance with the Federal Communications Commission multiple ownership rules (See Section 73.3555 of the FCC Rules).

Count of Stations in Defined Market

The number of radio stations in a "radio market" is determined by counting the operating, commercial stations having transmitter sites within and hence have principal community contours which overlap the principal community contours which define the radio market, plus the subject stations to be co-owned. The results of the analysis are tabulated below:

Defined Radio Market	Minimum Number of Stations in Radio Market
WFNT(AM)/WCRZ(FM)/WWBN(FM)/WZRZ-FM	9 AM, 7 FM; 16 total

Figure 2 is a tabulation of the radio stations identified in the defined Radio Market. Only known licensed, operating commercial stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313.

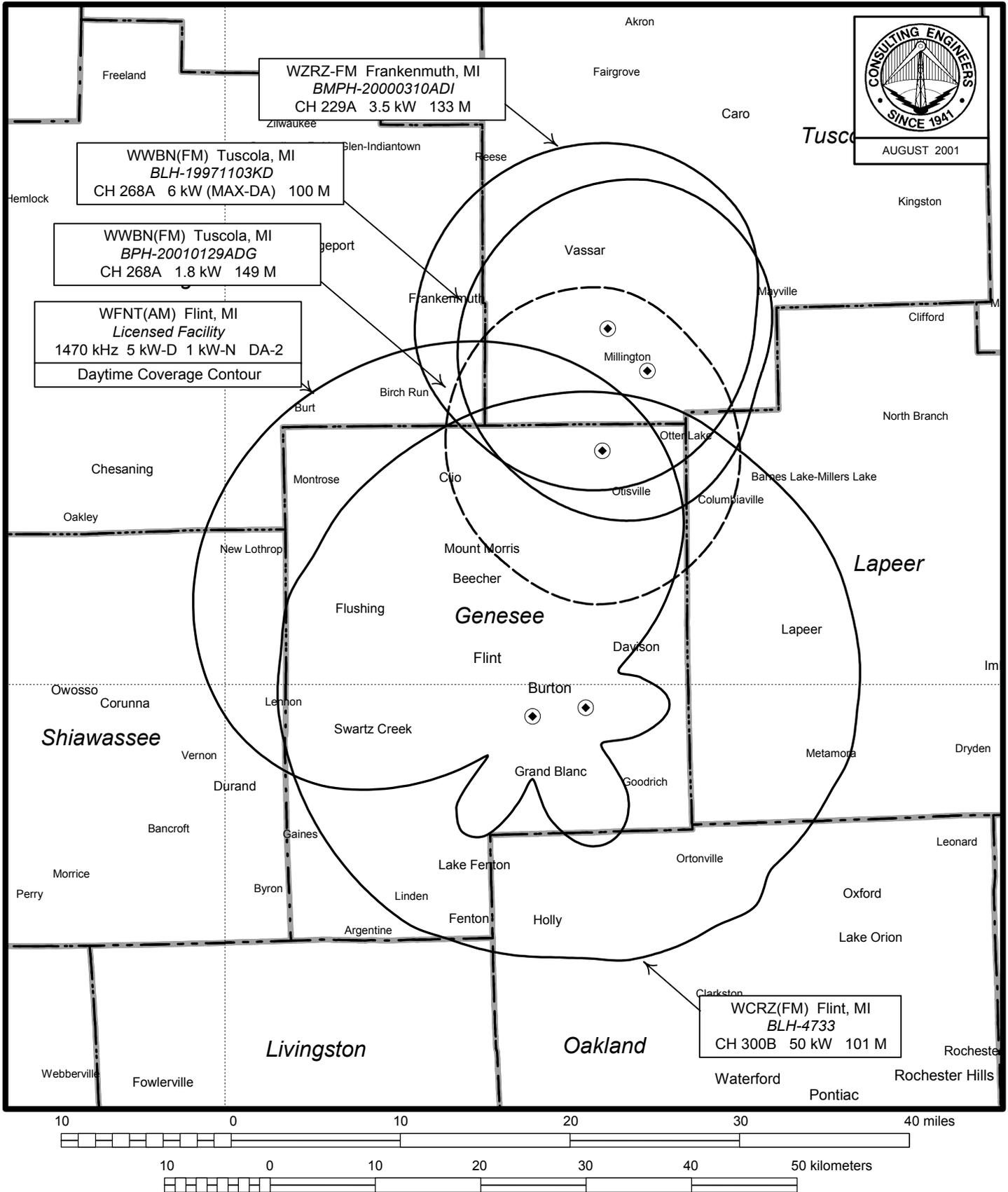
Based on the above, it is concluded that the proposed combination of stations complies with Section 73.3555(a) of the FCC Rules.

Charles A. Cooper

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
941.329.6000

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Figure 1



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

REGENT LICENSEE OF GRAND RAPIDS, INC.

du Treil, Lundin & Rackley, Inc., Sarasota, Florida

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Tabulation of Stations Defined in Radio Market

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
WSNL	Flint	MI	600
WFDF	Flint	MI	910
WCXI	Fenton	MI	1160
WMPC	Lapeer	MI	1230
WTRX	Flint	MI	1330
WFLT	Flint	MI	1420
WFNT	Flint	MI	1470
WLSP	Lapeer	MI	1530
WWCK	Flint	MI	1570
WDZZ-FM	Flint	MI	92.7
WFBE	Flint	MI	95.1
WOWE	Vassar	MI	98.9
WWBN	Tuscola	MI	101.5
WRSR	Owosso	MI	103.9
WWCK-FM	Flint	MI	105.5
WCRZ	Flint	MI	107.9