

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS

THE ST. PIER GROUP, LLC

This radio multiple ownership analysis was prepared on behalf of The St. Pier Group, LLC. The St. Pier Group, LLC proposes to acquire FM station WGSM(FM) on channel 296A at Greensburg, PA. Thus, the following stations are considered under proposed ownership or control:

Call Sign / Facility ID	Location	Facilities
WDAD(AM)/56645 Licensed	Indiana, PA	1450 kHz 1 kW-U ND1
WCCS(AM)/55250 Licensed	Homer City, PA	1160 kHz 10 kW-D DA2
WLCY(FM)/38376 Licensed	Blairsville, PA	Ch. 292A 2.4 kW 111 m
WQMU(FM)/56644 Licensed	Indiana, PA	Ch. 223A 3 kW 100 m
WECZ(AM)/55710 Licensed	Punxsutawney, PA	1540 kHz 5 kW-D NDD
WPXZ-FM/55711 Licensed	Punxsutawney, PA	Ch. 281A 3 kW 90 m
WYTR(FM)/81912 Licensed	Brookville, PA	Ch. 277B1 10.5 kW 151 m
WPTT(AM)/59695 Licensed	McKeesport, PA	1360 kHz 5 kW-D DAN
WJAS(AM)/55705 Licensed	Pittsburgh, PA	1320 kHz 5 kW-D DAN
WJAS(AM)/55705 Authorized CP Facility	Pittsburgh, PA	1320 kHz 7 kW-D DA2
WSHH(FM)/55709 Licensed	Pittsburgh, PA	Ch. 259B 10.5 kW 283 m
WSHH(FM)/55709 Authorized CP Operation	Pittsburgh, PA	Ch. 259B 15.5 kW 274 m
WGSM(FM)/72296 Licensed	Greensburg, PA	Ch. 296A 2.85 kW (DA) 147 m

The principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) of the all the stations are depicted on a map included herein as Figure 1. Since the principal community contour of FM station WGSM(FM) overlaps the principal community contours of FM station WLCY(FM) and AM station WCCS(AM), an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

### Radio Market

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned.\* There is one new “radio market” defined for analysis under the Commission’s Rules. The table below lists the defined market:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	WCCS(AM)	WGSM(FM), WLCY(FM)

### Count of Stations in Defined Market

The number of other radio stations in a “radio market” is determined by counting the operating stations having principal community contours that intersect the principal community contours which define the radio market. Only those stations located within 92 kilometers of the perimeter of the mutual overlap area of the respective defined market area were employed in the count of the stations. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	11 AM, 12 FM; 23 Total

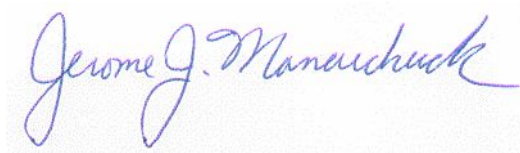
Figure 2 is a tabulation of the radio stations identified in the defined radio market tabulated above. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as

---

\* See Order in Implementation of Section 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 10 degrees of azimuth.

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

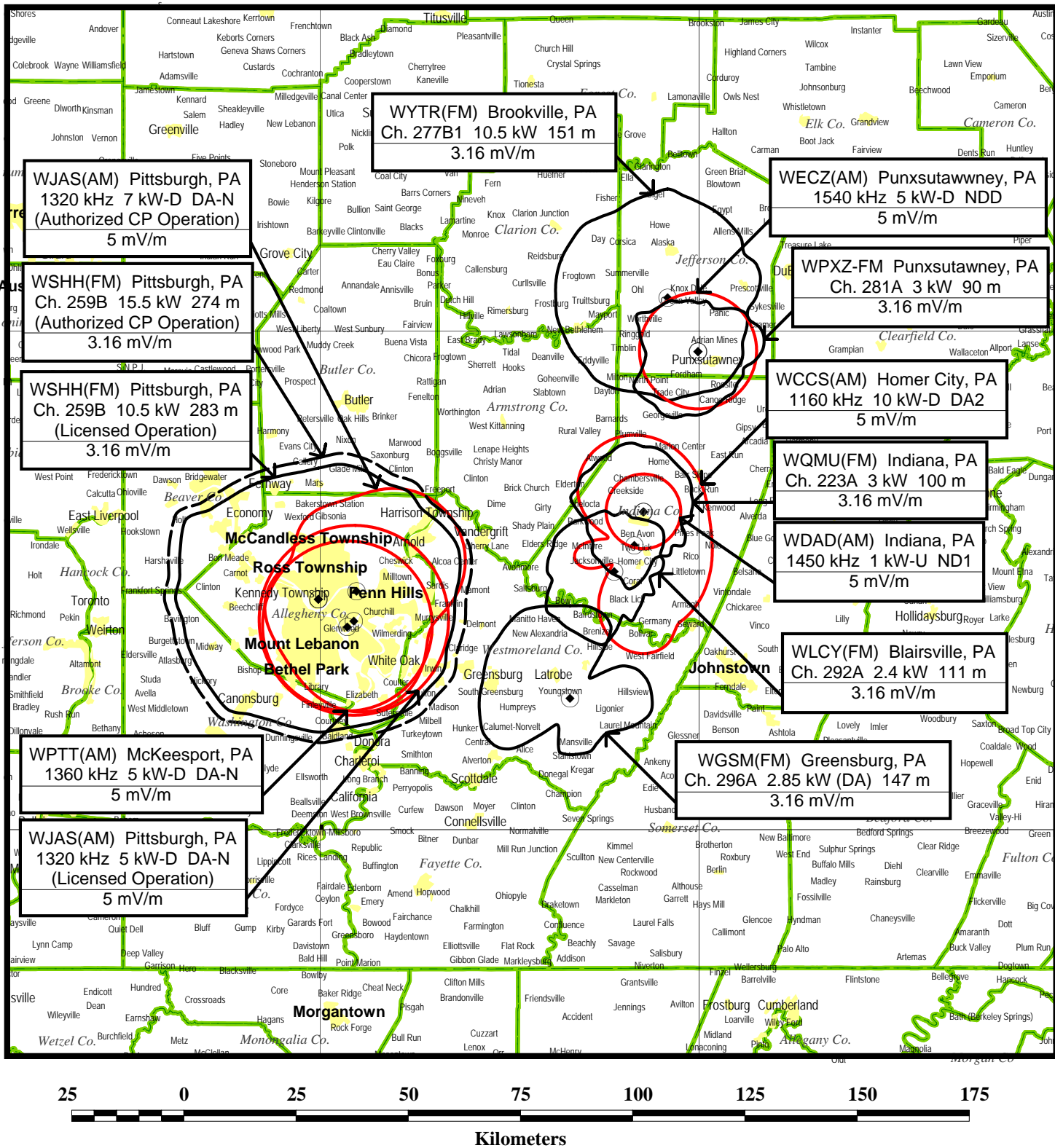


Jerome J. Manarchuck

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Ave.  
Sarasota, Florida 34237  
(941)329-6000

August 23, 2006

Figure 1



# PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

THE ST. PIER GROUP, LLC

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS

Tabulation of Other Stations Defined in Radio Market 1

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
WWCS(AM)	Canonsburg	PA	540 kHz
WKHB(AM)	Irwin	PA	620
WKFB(AM)	Jeannette	PA	770
WEDO(AM)	McKeesport	PA	810
WNTJ(AM)	Johnstown	PA	850
WAVL(AM)	Apollo	PA	910
KDKA(AM)	Pittsburgh	PA	1020
WWNL(AM)	Pittsburgh	PA	1080
WCNS(AM)	Latrobe	PA	1480
WQTW(AM)	Latrobe	PA	1570
WFRJ(FM)	Johnstown	PA	88.9 MHz
WQEJ(FM)	Johnstown	PA	89.7
WIUP-FM	Indiana	PA	90.1
WJHT(FM)	Johnstown	PA	92.1
WWSW-FM	Pittsburgh	PA	94.5
WFGI-FM	Johnstown	PA	95.5
WKYE(FM)	Johnstown	PA	96.5
WRRK(FM)	Braddock	PA	96.9
WPCL(FM)	Spangler	PA	97.3
WRKW(FM)	Ebensburg	PA	99.1