

# **R. M. SMITH ASSOCIATES**

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## **ENGINEERING STATEMENT ON MULTIPLE OWNERSHIP**

**ON BEHALF OF  
LONG POINT COMMUNICATIONS, LLC**

September 22, 2014

## PURPOSE AND SCOPE

This Engineering Statement has been prepared on behalf of Long Point Communications, LLC (“LPC”), the applicant for the assignment of licenses of the following seven broadcast facilities:

<u>CALLSIGN</u>	<u>COMMUNITY OF LICENSE</u>	<u>FACILITY ID</u>
WAUB(AM)	Auburn, NY	43791
WLLW(FM)	Seneca Falls, NY	5392
WFLR(AM)	Dundee, NY	36407
WCGR(AM)	Canandaigua, NY	8504
WFLK(FM)	Geneva, NY	40804
WGVA(AM)	Geneva, NY	36290
WNYR-FM	Waterloo, NY	36288

LPC is not currently the licensee of any other broadcast facilities in the area of the above listed stations.

This Statement addresses the overlap of the FM 70 dBu F(50,50) contours and AM 5.0 mV/m contours of the above listed stations.

## DEFINED MARKETS

Figure 1 of this Statement is a map showing the 70 dBu F(50,50) contour of all of the above listed FM facilities (shown in orange) and the 5.0 mV/m daytime ground wave contour of all of the above listed AM facilities (shown in green). As shown on that Figure, each of the listed facilities overlaps in part one or more of the other listed facilities.

Three markets requiring analysis are defined. The first, labeled Market 1, is the area defined by the overlap of four affiliated stations, WLLW(FM), WFLK(FM), WGVA(AM) and WNYR-FM. The second, labeled Market 2, is the area defined by the overlap of three affiliated stations, WAUB(AM), WLLW(FM) and WNYR-FM. The third, labeled Market 3 is the area defined by the overlap of two affiliated stations, WGVA(AM) and WCGR(AM).

## NON-AFFILIATED STATIONS IN MARKETS

Figure 2 is a plot of the defined Market 1 and the transmitter sites and 70 dBu contours of some of the non-affiliated stations in Market 1.

In addition to affiliated stations, the following three non-affiliated stations have antenna sites located within the contour of one or more of the affiliated stations defining Market 1.

<b>STATION</b>	<b>COMMUNITY OF LICENSE</b>	<b>FACILITY ID</b>
WEOS(FM)	Geneva, NY	65559
WCOV-FM	Clyde, NY	34561
WSFW(AM)	Seneca Falls, NY	5391

In addition to affiliated stations, the following three non-affiliated stations have FM 70 dBu F(50,50) or AM 5.0 mV/m contours which overlap in part one of more of the FM 70 dBu F(50,50) or AM 5.0 mV/m contours of the affiliated stations defining Market 1.

<b>STATION</b>	<b>COMMUNITY OF LICENSE</b>	<b>FACILITY ID</b>
WYLF(AM)	Penn Yan, NY	39466
WKEL(FM)	Webster, NY	20953
WACK(AM)	Newark, NY	52123

Figure 3 is a plot of the defined Market 2 and the transmitter sites of some of the non-affiliated stations in the Market 2.

In addition to affiliated stations, the following four non-affiliated stations have antenna sites located within the contour of one or more of the affiliated stations defining Market 2.

<b>STATION</b>	<b>COMMUNITY OF LICENSE</b>	<b>FACILITY ID</b>
WMBO(AM)	Auburn, NY	25001
WCOV-FM	Clyde, NY	34561
WSFW(AM)	Seneca Falls, NY	5391
WDWN(FM)	Auburn, NY	9426

Figure 4 is a plot of the defined Market 3 and the transmitter sites and 70 dBu and 5.0 mV/m contours of some of the non-affiliated stations in Market 3.

In addition to affiliated stations, the following non-affiliated station has its antenna site located within the contour of one of the affiliated stations defining Market 3.

<b>STATION</b>	<b>COMMUNITY OF LICENSE</b>	<b>FACILITY ID</b>
WEOS(FM)	Geneva, NY	65559

In addition to affiliated stations, the following two non-affiliated stations have FM 70 dBu F(50,50) or AM 5.0 mV/m contours which overlap in part one of more of the AM 5.0 mV/m contours of the affiliated stations defining Market 3.

<b>STATION</b>	<b>COMMUNITY OF LICENSE</b>	<b>FACILITY ID</b>
WKEL(FM)	Webster, NY	20953
WACK(AM)	Newark, NY	52123

## **CONCLUSIONS**

Market 1 has four affiliated stations and a minimum of six non-affiliated stations in the market.

Market 2 has three affiliated stations and a minimum of four non-affiliated stations in the market.

Market 3 has two affiliated stations and a minimum of three non-affiliated stations in the market.

The assignment to Long Point Communications, of the seven listed facilities complies with the Multiple Ownership provisions of 47 C.F.R. §73.3555(a)(1)(iv).

## **CERTIFICATION**

I, Robert M. Smith Jr. do hereby state that all of the data and calculations used in the preparation of this Statement are true and correct to the best of my knowledge and belief.

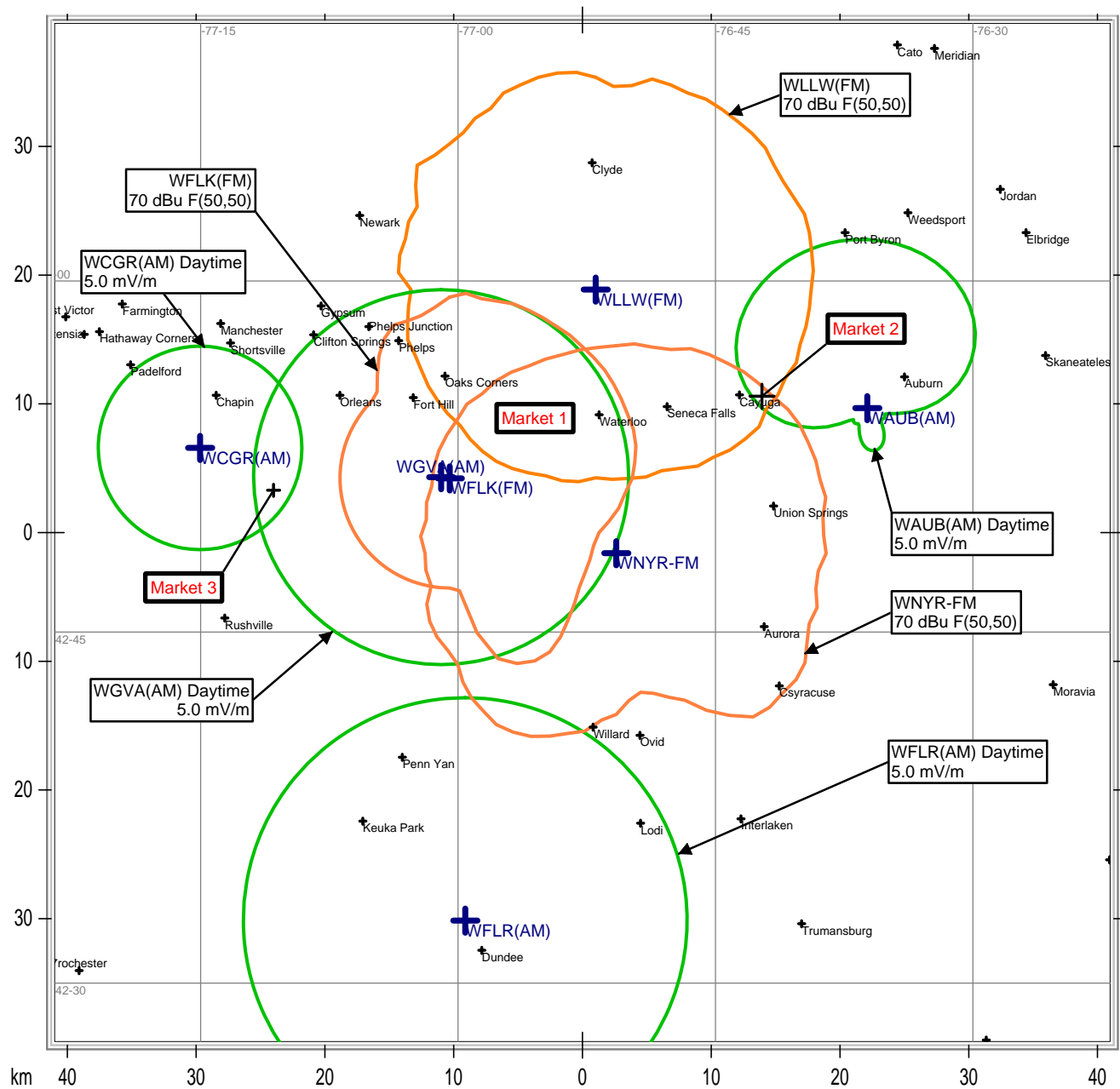
I further state that I am an experienced and qualified broadcast engineer and that my qualifications are a matter of record with the Commission.

A handwritten signature in black ink, appearing to read "Robert M. Smith Jr.", written in a cursive style.

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Robert M. Smith Jr.

LONG POINT COMMUNICATIONS, LLC



MULTIPLE OWNERSHIP STUDY

State Borders Lat/Lon Grid

The map displays the Rochester, NY market area with various radio station coverage zones. The stations and their call signs are:

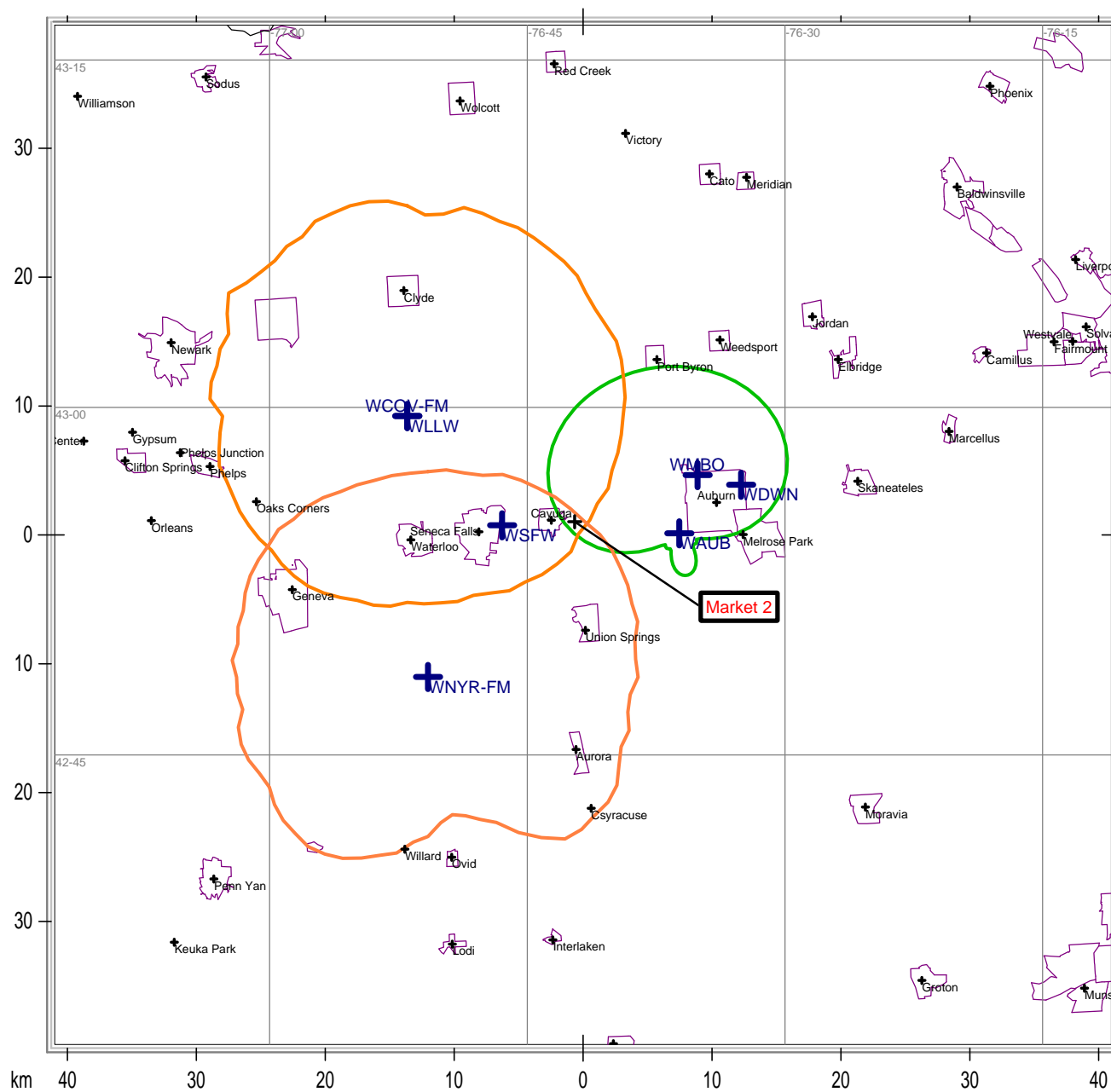
- WKEL (AM 5.0MV/M, 70 DBU F(50,50))
- WACK (AM 5.0MV/M)
- WCOV-FM WLLW
- WWSF
- WYLF (AM 5.0MV/M)
- WEOS
- WNYR-FM

The map includes a scale bar from 0 to 40 km and a grid of latitude and longitude coordinates. The latitude ranges from 42-30 to 43-00 N, and the longitude ranges from 76-30 to 77-15 W. The map also shows various towns and cities in the region, including Rochester, Syracuse, Albany, and Buffalo.

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FIGURE 2

LONG POINT COMMUNICATIONS, LLC

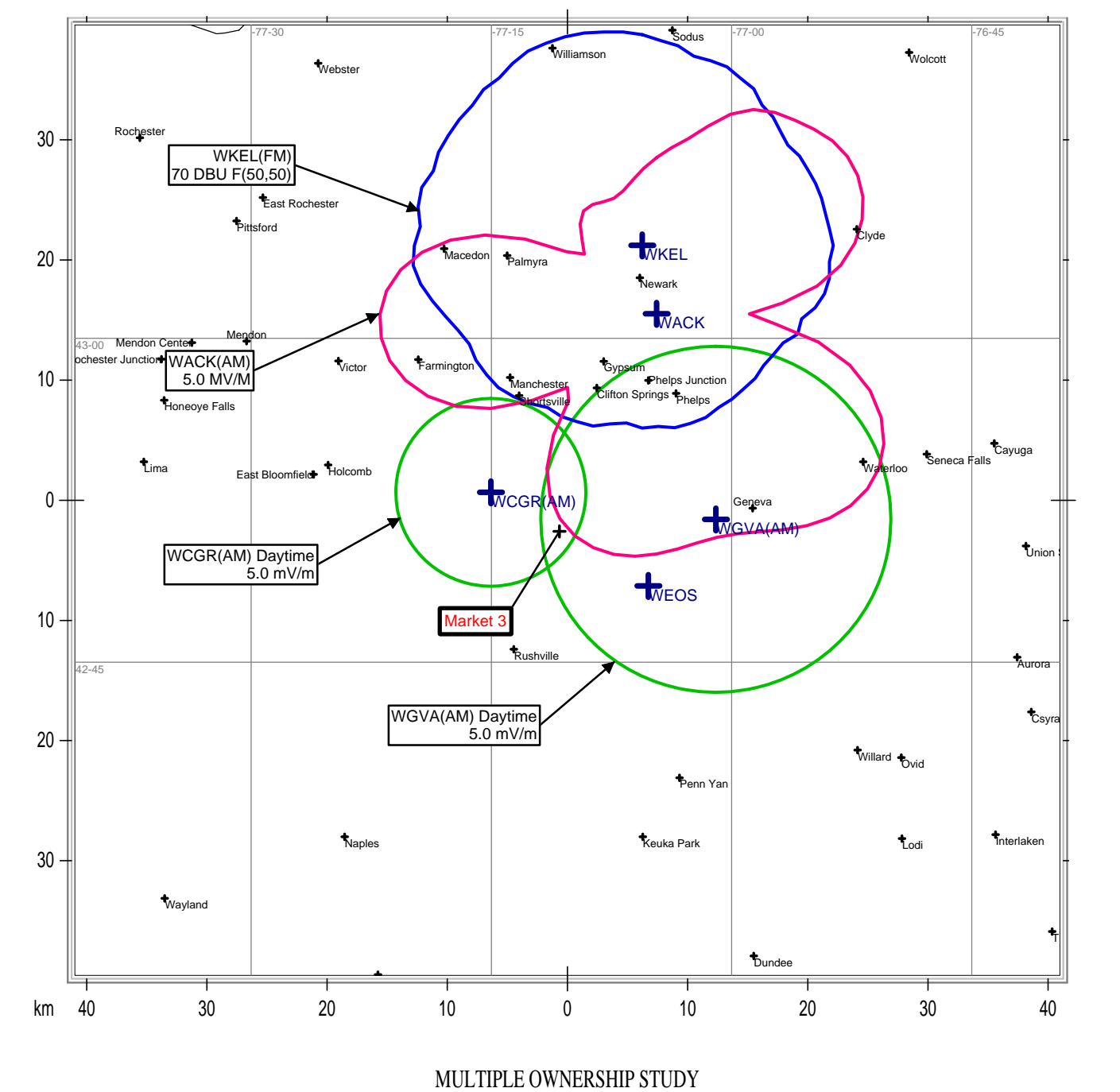


## MULTIPLE OWNERSHIP STUDY

 State Borders
  City Borders
  Lat/Lon Grid



LONG POINT COMMUNICATIONS, LLC



State Borders      Lat/Lon Grid