

August 2003 Multiple Ownership Amendment

Station WYCA(FM) Lansing, IL, is a grand-fathered short-spaced station authorized prior to November 1964. As such, it is entitled to certain channel spacing protections set forth in §73.213 of the rules. As more fully described in the engineering documents, this application does not increase station coverage area, but rather proposes to increase station antenna height, with a commensurate power reduction. These changes will result in an E.R.P. and coverage area identical to that licensed at present. Accordingly, this application does not propose to increase the same service city-grade overlap to any commonly owned or controlled station.

The licensee's current arrangement of owned and controlled stations in the market was approved when the licensee acquired station WYBA(FM) FAC #73700 Crete, IL, pursuant to FCC consent granted in FCC Form 314, File No. BALH-19970609A7. A copy of the multiple ownership study submitted with the assignment application is attached hereto as Exhibit 1.

As shown in the attached market study, Dontron, Inc., owns and controls three FM stations in the market study area, each of which are assigned to communities and counties comprising part of the defined Chicago Arbitron Metro Market:

WPWX(FM) FAC #17304 Hammond, Lake County, IN

WYBA(FM) FAC #73700 Crete, Cook County, IL

WYCA(FM) FAC #6590 Lansing, Cook County, IL

There are nine additional counties comprising the Chicago metro market area.

There is no area common to the city-grade signal of all three stations. Instead, WPWX shares some common city-grade contour with WYBA, and WPWX shares some common city grade contour with WYCA. However, WYBA shares no common city grade contour with WYCA.

Dontron, Inc., is not a party to any local marketing agreement, time brokerage agreement, nor joint sale agreement with any same market station; nor does it have an attributable interest in any television station anywhere.

Being one of the largest broadcast markets in the nation, there are a tremendous number of stations competing for audience and market share in the Chicago Arbitron Metro Market.. For example, the Commission's CDBS reflects 15 AM stations and 26 FM stations licensed to the city of Chicago alone, which is at the heart of the Chicago Arbitron Market.

Section 73.3555 of the Commission's rules provides that in a radio market with between 15 and 29 radio stations, a party may own or control up to six stations, not more than four of which are in the same service.

As there are well over 29 stations serving the Chicago Arbitron Metro Market, it is clear that the proposed construction permit, which does not propose to increase the amount of same service city-grade overlap, complies with section 73.3555 of the rule.

While the proposal presented herein satisfies the Commission's rules, there are additional stations serving the market study area, the identities of which will be supplied upon request.