

RADIO MARKET ANALYSIS
MILLER COMMUNICATIONS, INC.
WDKD/WWKT-FM RADIO STATIONS
KINGSTREE, SOUTH CAROLINA
November 2001

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Miller Communications, Inc. ("Miller"), proposed assignee of radio stations WDKD, 1310 kHz, and WWKT-FM, Channel 257C3, Kingstree, South Carolina.¹ Miller also has attributable interests in the facilities of WDXY, 1240 kHz, and WICI-FM, Channel 234A, Sumter, South Carolina;² WIBZ, Channel 238A, Wedgefield, South Carolina;³ and WKHT, Channel 229A, Bishopville, South Carolina.⁴ The licensed 3.16 mV/m contours of WWKT-FM and WICI-FM overlap. There is no overlap between the 5.0 mV/m contours of AM stations WDKD and WDXY. However, based on the outstanding construction permit of WWKT-FM, there will be overlap of the WWKT-FM 3.16 mV/m contour with either the authorized or proposed contours of WICI-FM, WIBZ and WKHT. Based on the WWKT-FM permit, this results in Miller having attributable interests in four FM facilities and one AM facility in the same market. Exhibit #1 is a map depicting the subject stations.

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- 1) There is an outstanding construction permit for W W K T - F M that is also considered in this instant analysis.
 - 2) The Commission approved the transfer of WICI-FM to Miller on September 27, 2001.
 - 3) WIBZ is operating under program test authority with the facilities authorized in BPH-19990804IF. A license to cover the permit has been filed (BLH-20011015AAA). There is also a pending minor change application to relocate WIBZ that is considered in this instant analysis.
 - 4) There is a pending minor change application to relocate WKHT to a new site. This application is also considered in this instant analysis.

2. A study has, therefore, been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. The study is to determine the number of other commercial AM and FM stations which either have transmitter sites within the subject radio market, or have principal community contour overlap with either of the subject stations. Due to the number of subject stations and pending applications/permits, the city grade contour of the authorized WWKT-FM permit was used to define the Radio Market for the purposes of this analysis.

3. Exhibit #2 is a depiction of the Radio Market with the transmitter sites or city grade contours of ten commercial AM and FM stations, excluding subject stations. Exhibit #3 is a tabulation of the stations in the WWKT-FM radio market, including the five subject stations. The total of stations in the market is fifteen stations. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.⁵ At the fifteen to twenty nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. Miller's interests in the four FM stations and one AM station in the same radio market are in compliance with the Commission's rules.⁶ Therefore, Miller's proposed ownership of WDKD and WWKT-FM is in compliance with §73.3555 of the rules.

5) Although there are additional stations providing service to the Radio Market, they are not considered since the number of stations was ample to demonstrate compliance with the rules based on the number of stations proposed to be commonly owned.

6) There is also a second market containing WDKD and WWKT-FM (either licensed or permitted) that also contains WHLZ, WHYM and WMXT. As such, in a market of fourteen or fewer stations, ownership of two stations with a total of five stations in the market is in compliance with §73.3555 of the rules.

4. The foregoing technical statement was prepared on behalf of Miller Broadcasting, Inc, by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

Graham Brock, Inc. - Broadcast Technical Consultants

WWKT-FM
BLH-19950908KC
Latitude: 33-41-35 N
Longitude: 079-57-34 W
Power: 22.00 kW
Channel: 257C3

WWKT-FM CP
BPH-20001106ABD
Latitude: 33-47-51 N
Longitude: 080-07-04 W
Power: 19.00 kW
Channel: 257C3

WDKD
Latitude: 33-42-11 N
Longitude: 079-49-08 W
Power: 5.00 kW
Frequency: 1310 kHz

WIBZ.C
BPH-19990804IF
Latitude: 33-51-14 N
Longitude: 080-31-47 W
Power: 6.00 kW
Channel: 238A

WIBZ App.
BPH-20010425AAB
Latitude: 33-56-56 N
Longitude: 080-23-34 W
Power: 4.40 kW
Channel: 238A

EXHIBIT #1
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WKHT
BLH-19920909KB
Latitude: 34-07-11 N
Longitude: 080-08-48 W
Power: 6.00 kW
Channel: 229A

WKHT App.
BPH-20011024AAB
Latitude: 34-03-45 N
Longitude: 080-14-56 W
Power: 3.00 kW
Channel: 229A

WICI-FM
BLH-19950703KB
Latitude: 33-51-55 N
Longitude: 080-17-09 W
Power: 2.85 kW
Channel: 234A

WDXY
Latitude: 33-54-16 N
Longitude: 080-19-25 W
Power: 1.00 kW
Frequency: 1240 kHz

WKHT APP 3.16 mV/m

WIBZ APP 3.16 mV/m

WIBZ CP 3.16 mV/m

WDXY 5.0 mV/m

WICI 3.16 mV/m

WWKT-FM CP 3.16 mV/m

WKHT 3.16 mV/m

WDKD 5.0 mV/m

WWKT-FM LIC. 3.16 mV/m

Scale 1:1,000,000
0 10 20 30 km

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EXHIBIT #3

Tabulation of Stations in WWKT-FM Radio Market

AM Stations

WYMB	920 kHz	Manning, SC
* WDXY	1240 kHz	Sumter, SC
+ WHYM	1260 kHz	Lake City, SC
WQMC	1290 kHz	Sumter, SC
+ WSSC	1340 kHz	Sumter, SC

Total AM Stations - 5

FM Stations

+ WHLZ	Ch 223C	Manning, SC
* WKHT	Ch 229A	Bishopville, SC
WGSS	Ch 231A	Kingstree, SC
* WICI-FM	Ch 234A	Sumter, SC
* WIBZ	Ch 238A	Wedgefield, SC
WLJI	Ch 252A	Summerton, SC
* WWKT-FM	Ch 257C3	Kingstree, SC
+ WWFN	Ch 261A	Lake City, SC
+ WWDM	Ch 267C	Sumter, SC
+ WMXT	Ch 271C2	Pamplico, SC

Total FM Stations - 10

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 15

* Subject station.

+ City grade contour provides service to Radio Market.