

RADIO MARKET ANALYSIS
MILLER COMMUNICATIONS, INC.
WIGL FM RADIO STATION
ORANGEBURG, SOUTH CAROLINA
WGFG FM RADIO STATION
BRANCHVILLE, SOUTH CAROLINA
WWBD FM RADIO STATION
BAMBERG, SOUTH CAROLINA
March 2003

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Miller Communications, Inc. ("MCI"), proposed assignee of radio stations WIGL (FM), Channel 275A, Orangeburg¹; WGFG (FM), Channel 286A, Branchville, South Carolina; and WWBD (FM), Channel 239A, Bamberg, South Carolina. The 3.16 mV/m contours of WIGL, WGFG and WWBD have common service area. We note that Miller Communications is also the proposed assignee of FM station WQKI and AM station WQKI. However, these stations do not enter into the definition of the 'Radio Market' since their city grade contours do not have common area with the above three stations.² The three subject stations do result in MCI having attributable interests in three FM facilities in the one market (WGFG/WIGL/WWBD). Exhibit #1 is a map depicting the subject stations.

2. A study has, therefore, been conducted to determine if ownership of these facilities, in the radio market, complies with §73.3555 of the Commission's rules. The study is to determine the number of other commercial AM and FM stations that either have transmitter sites within the

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- 1) WIGL also has an outstanding construction permit to increase height and decrease power. This CP does not effect the Radio Market Boundary.
- 2) Although these stations do not define the Radio Market, they do have city grade contours which contribute to the market. However, since these stations are proposed to be assigned to Miller Communications, they are not considered in the 'total' contributors to the market.

subject radio market, or have principal community contour overlap with any of the subject stations. The number of subject stations will then be added to the number of other stations for a total number of stations in the respective Radio Market.

3. Exhibit #2 is a depiction of the Radio Market with the transmitter sites or city grade contours of twelve commercial AM and FM stations, including the three subject stations. Exhibit #3 is the tabulation of the stations in the Radio Market. The total number of stations in the Radio Market falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules.³ At the fourteen or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible (provided the number of stations to be commonly held does not exceed 50% of the market). Therefore, MCI's interests in three FM stations is in compliance with the Commission's rules. MCI's proposed ownership of WIGL, WGFG and WWBD is in compliance with §73.3555 of the rules.

4. The foregoing technical statement was prepared on behalf of Miller Communications, 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 pertinent CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

3) There are additional stations in the market, but they were not considered since the number of stations depicted was sufficient to demonstrate that the total of stations to be commonly held is in compliance with the Commission's rules.

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

WIGL-CP

BPH19970626IH
Latitude: 33-27-53 N
Longitude: 080-56-42 W
ERP: 2.70 kW
Channel: 275
Frequency: 102.9 MHz
AMSL Height: 213.0 m
70 dBu - 3.16 mV/m

WWBD

BLH19970811KC
Latitude: 33-18-50 N
Longitude: 081-04-43 W
ERP: 6.00 kW
Channel: 239
Frequency: 95.7 MHz
AMSL Height: 151.0 m
70 dBu - 3.16 mV/m

WIGL - Licensed

BLH19871223KE
Latitude: 33-27-53 N
Longitude: 080-56-42 W
ERP: 3.00 kW
Channel: 275
Frequency: 102.9 MHz
AMSL Height: 162.0 m
70 dBu - 3.16 mV/m

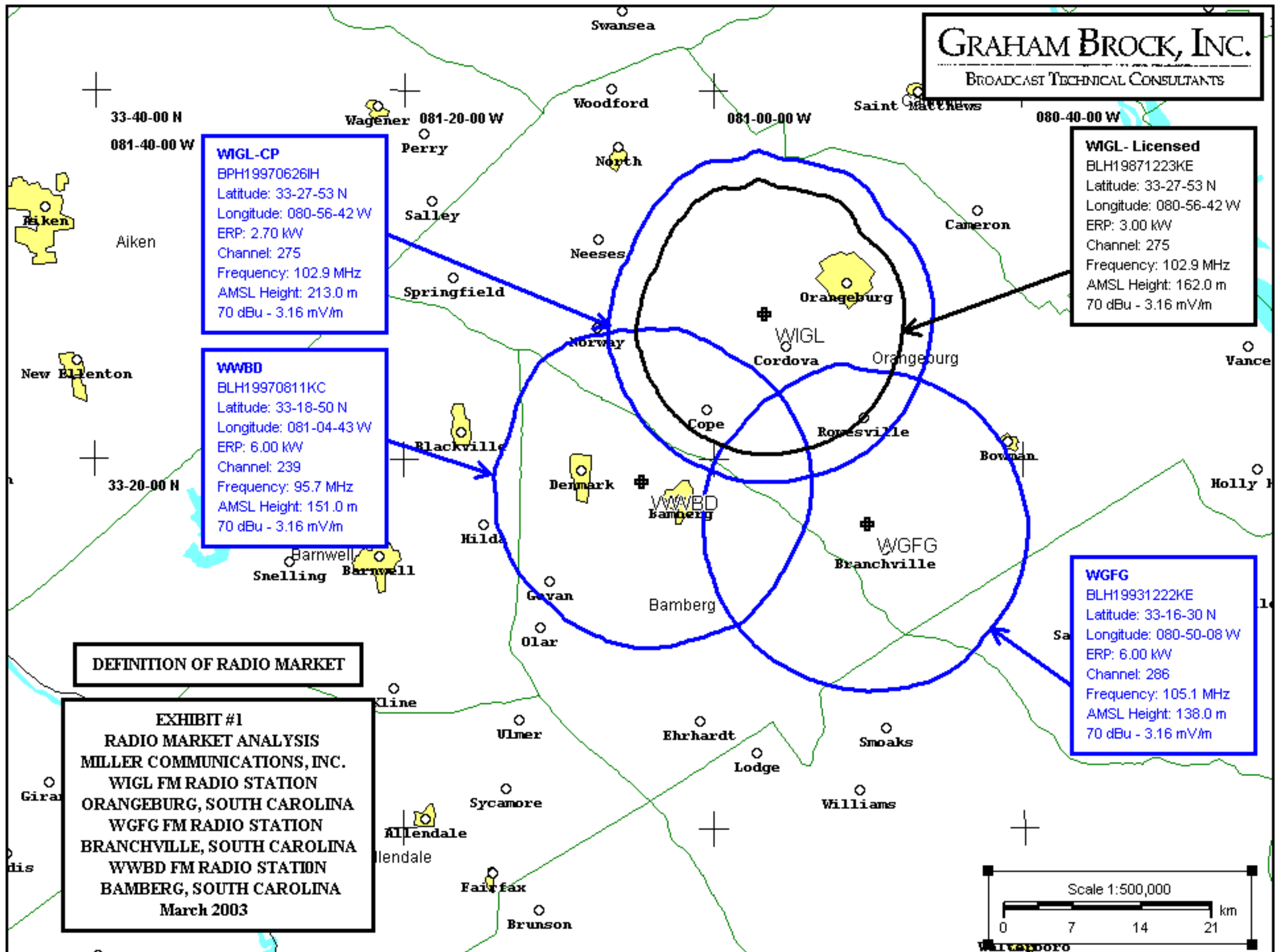
WGFG

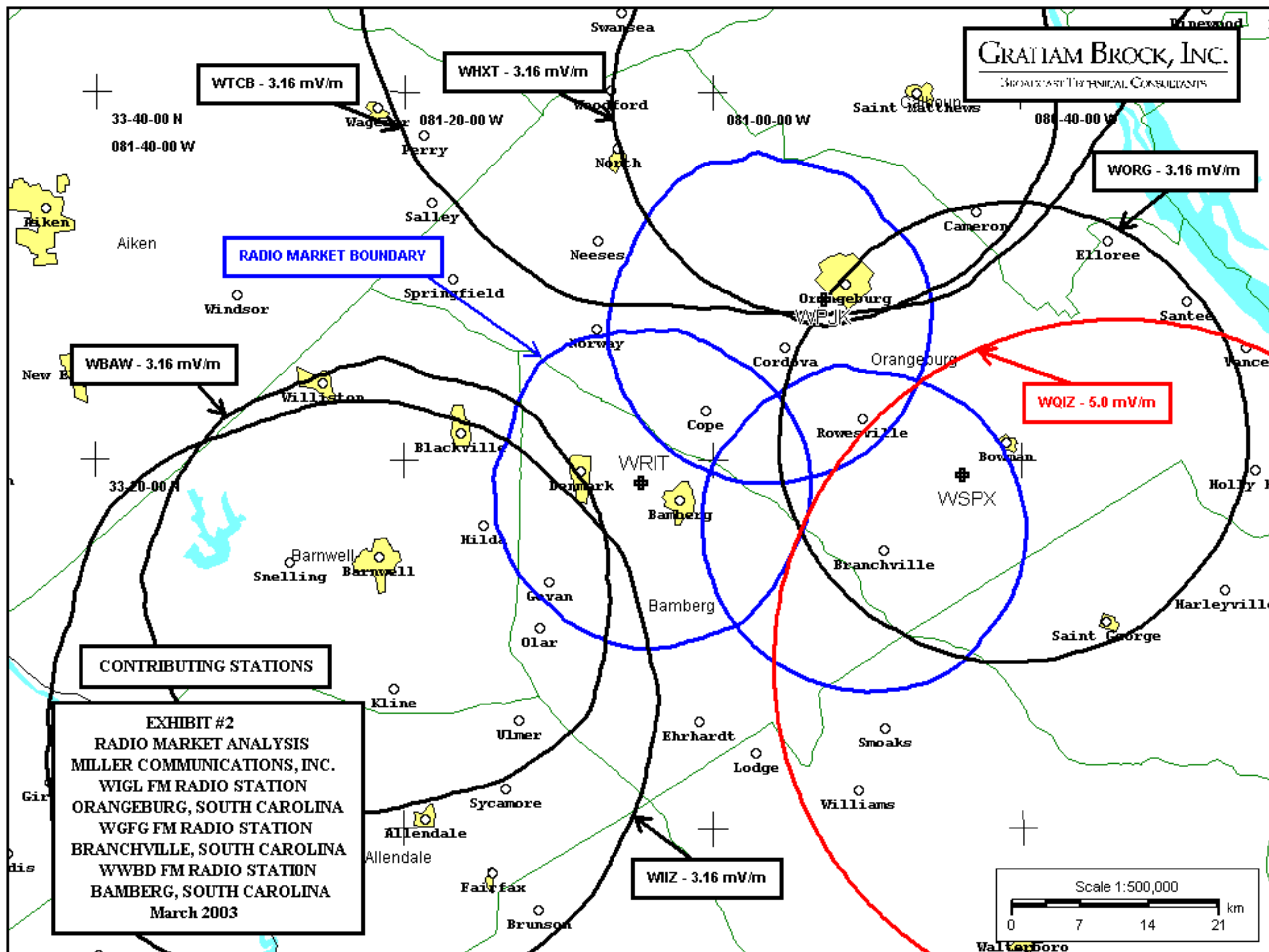
BLH19931222KE
Latitude: 33-16-30 N
Longitude: 080-50-08 W
ERP: 6.00 kW
Channel: 286
Frequency: 105.1 MHz
AMSL Height: 138.0 m
70 dBu - 3.16 mV/m

DEFINITION OF RADIO MARKET

EXHIBIT #1

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EXHIBIT #3

Tabulation of Stations in Radio Market

AM Stations

	WRIT	790 kHz	Bamberg-Denmark, SC
+	WQIZ	810 kHz	St. George, SC
	WPJK	1580 kHz	Orangeburg, SC

Total AM Stations - 3

FM Stations

	WSPX	Ch 233A	Bowman, SC
*	WWBD	Ch 239A	Bamberg, SC
+	WIIZ	Ch 250C2	Blackville, SC
+	WBAW	Ch 256C3	Barnwell, SC
+	WORG	Ch 262C3	Elloree, SC
*	WIGL	Ch 275A	Orangeburg, SC
+	WHXT	Ch 280C3	Orangeburg, SC
*	WGFG	Ch 286A	Branchville, SC
+	WTCB	Ch 294C1	Orangeburg, SC

Total FM Stations - 9

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 12

* Subject station.

+ City grade contour provides service to Radio Market.