

MULTIPLE SERVICES STUDY

Associated with the
Co-ownership of Stations:

WBGV(FM) – Marlette, MI
WTGV-FM – Sandusky, MI
WMIC(AM) – Sandusky, MI

Interim Contour Methodology

November 2019

CERTIFICATION OF ENGINEERS

The firm of Munn-Reese, Broadcast Engineering Consultants, with offices at 385 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data forming this report.

The data utilized in this report was taken from the FCC Secondary Database and data on file. While this information is believed accurate, errors or omissions in the database and file data are possible. This firm may not be held liable for damages as a result of such data errors or omissions.

The report has been prepared by properly trained electronics specialists under the direction of the undersigned whose qualifications are a matter of record before the Federal Communications Commission.

I declare under penalty of the laws of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

November 1, 2019

MUNN-REESE

By



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Engineering Statement

This firm was retained to determine whether the following stations could be commonly owned or controlled and be in compliance with the Commission's multiple ownership rule, 47 C.F.R. Section 73.3555: WBGV(FM), WTGV-FM and WMIC(AM). This report is being submitted with the application associated with the acquisition of WBGV(FM).

Under the *Interim Contour-overlap Methodology*, one (1) separate and distinct market will result within this entire ownership group. "Market #1" is comprised of WBGV(FM), WTGV-FM, and WMIC(AM)

The existing facilities of the stations included in this report were determined by the use of currently updated copies of the FCC computer databases of AM and FM stations. The listed facilities served as the basis for the computation of the respective principal community contours. The accuracy of the results of this study is understood to be limited to the accuracy of these databases. The FCC databases give no indication of licensed facilities that may be inoperative, construction permit facilities that may now be operating under program test authority (but have not yet been issued a license) or facilities which may have been licensed since the last update. Therefore, some stations may have been included or excluded erroneously. However, unless otherwise indicated, all licensed facilities known to be inoperative and all known applications and construction permit facilities, have been eliminated from consideration in this study.

For AM stations, Map M-3 soil conductivity values and the authorized licensed transmitting facilities served as the basis for the computation of the predicted 5.0 mV/m groundwave contour in accordance with §73.183 of the FCC Rules. The distance to the contour was computed for seventy-two (72) equally spaced azimuths beginning with 0° True. For FM stations, the authorized Center of Radiation and ERP values were utilized to compute the predicted 3.16 mV/m (70 dBu) contour as provided in §73.313 of the Rules. The predicted FM contours shown in this report are based on the use of 72 equally spaced terrain radials beginning with 0° True.

Engineering Statement (continued)

As stated before, there is only one (1) unique and distinct market associated with this filing that requires the *Interim Contour-overlap Methodology*. The market has been defined, in accordance with §73.3555 of the FCC Rules, as the area within the total perimeter formed by the combined principal community contours of WBGV(FM), WTGV-FM, and WMIC(AM) as designated Market #1.

Exhibit 1.0 shows the (3) stations under common control or proposed to be under common control which are relevant for this ownership group. The “Market 1” common overlap areas have been designated as well.

For “Market #1”, the market defining contours have been shown in **Exhibit 2.0** of this report along with enough additional principal community contours entering the market. The defining contours have been shown with purple dashed lines on this map. AM contours entering the market have been denoted in green lines. FM contour entering the market have been shown in red lines. Co-owned stations entering the market, but not defining the market have been omitted. **Exhibit 2.1** a tabulation of the stations.

Under the current rules, “Market #1” falls at least within the minimum limitations set forth in §73.3555 (a)(1)(iv): ***In a radio market with 14 or fewer full-power, commercial and noncommercial radio stations, not more than 5 commercial radio stations in total or not more than 3 commercial stations in the same service (AM or FM); provided however, that no person or single entity (or entities under common control) may have a cognizable interest in more than 50% of the full-power, commercial and noncommercial stations in such market unless the combination of stations comprises not more than one AM and one FM station.*** The principal community contours of at least four (4) other stations entering the Market #1 are shown in **Exhibit 2.0**. Including the (2) FM and 1 (AM) stations which define the market, there are at least six (6) aural services in “Market #1”, giving less than a 50% interest in the market. **Exhibit 2.1** lists the facilities of the individual stations used in this “Market #1” report.

Exhibit 1.0 - Map Showing All Commonly Owned Stations

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- WTGV-FM (249)
- WBGV (223)
- WMIC.L

Market #1
WTGV-FM
WBGV(FM)
WMIC(AM)

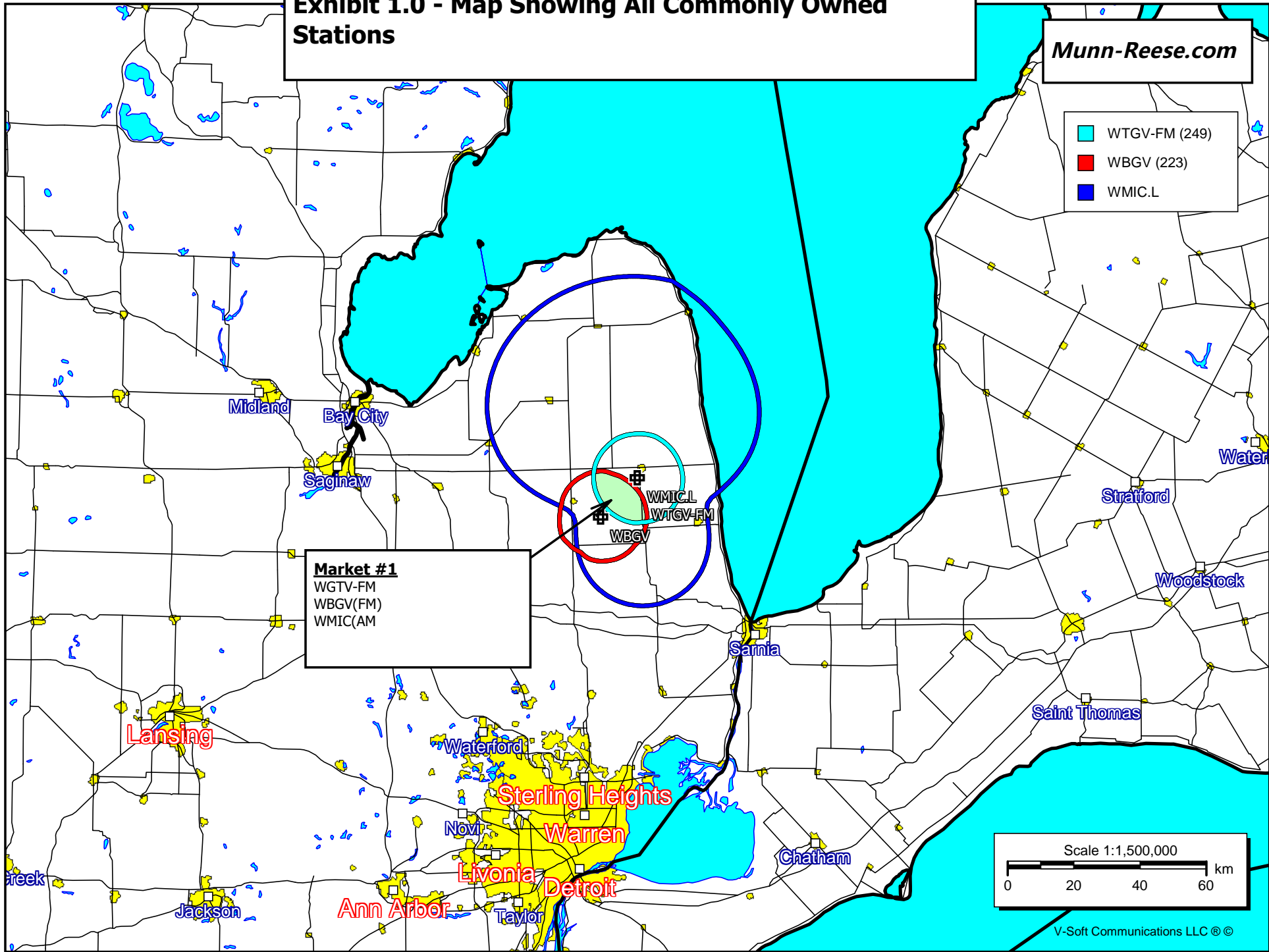


Exhibit 2.0 - Stations Entering Market #1

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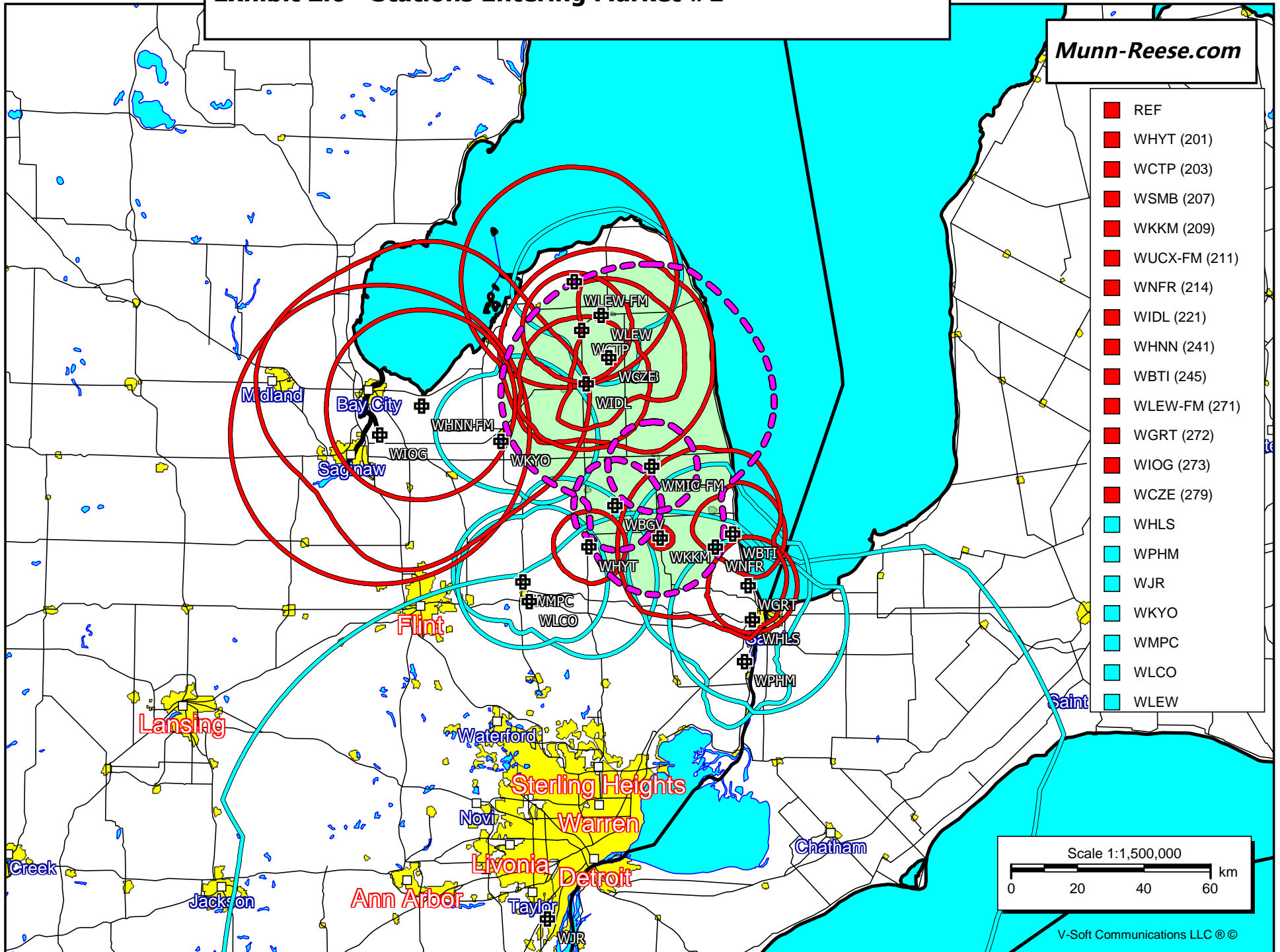


Exhibit 2.1

Tabulation of Select Stations Entering "Market #1"

Stations Entering Market #1: (No Less than 6)

Total number of overlapping contours: 23

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WBGV	FM	223A Marlette	MI	BLH19990621KC	0.0	0.0
WTGV-FM	FM	249A Sandusky	MI	BLH19921102KE	16.2	43.0
WMIC	AM	660 SANDUSKY	MI	BL20130522AEV	16.2	43.0

Overlapping Contours:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
WHYT	FM	201A Goodland Township	MI	BLD20031016AAT	14.6	212.3
WCTP	FM	203A Gagetown	MI	BLD20060616ABV	53.6	349.2
WSMB	FM	207C3 Harbor Beach	MI	BLD20121026ACG	44.5	357.6
WKKM	FM	209A Speaker Township	MI	BLD20130809AAQ	16.7	125.4
WUCX-FM	FM	211C2 Bay City	MI	BLD19891010KB	65.3	297.2
WNFR	FM	214B Sandusky	MI	BLD20050303ACY	32.6	112.3
WIDL	FM	221C3 Cass City	MI	BLH20130313ACE	37.6	346.7
WHNN	FM	241C0 Bay City	MI	BLH19920211KB	65.3	297.2
WBTI	FM	245A Lexington	MI	BLH19910620KB	36.4	103.4
WLEW-FM	FM	271C2 Bad Axe	MI	BLH19890117KK	68.3	349.7
WGRT	FM	272A Port Huron	MI	BLH19911230KD	46.7	121.0
WIOG	FM	273B Bay City	MI	BLH19850207KK	73.7	286.7
WCZE	FM	279C2 Harbor Beach	MI	BLH20050421ABP	44.5	357.6
WHLS	AM	1450 PORT HURON	MI	BL	53.7	129.6
WPHM	AM	1380 PORT HURON	MI	BL13920	60.9	140.2
WJR	AM	760 DETROIT	MI	BL19970212AC	125.8	189.2
WKYO	AM	1360 CARO	MI	BL19790117AO	39.3	299.4
WMPC	AM	1230 LAPEER	MI	BML19810518AG	35.8	230.3
WLCO	AM	1530 LAPEER	MI	BL	38.6	221.7
WLEW	AM	1340 BAD AXE	MI	BL19970117AB	57.3	355.8

Distance and bearing calculations from coordinates: 43-17-10.01 N, 082-58-17.02 W

Duopoly Options:

TV: Not Included

FM: 3.16 mV/m (70 dBu); Include NCE

AM: 5.0 mV/m