

ENGINEERING STATEMENT
ON BEHALF OF
MOUNTAIN BROADCASTING SERVICE, INC.
RE SECTION 73.3555 OF THE FCC RULES
REGARDING STATIONS
WZQQ(AM), WSGS(FM), WKIC(FM) AND WJMD(FM)

DECEMBER 2011

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President, Secretary and Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1420 N Street, N.W., Suite One, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

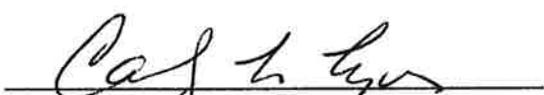
That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.


Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 14th day of December, 2011.




Notary Public

My Commission Expires: 2/28/2013

This engineering statement has been prepared on behalf of Mountain Broadcasting Service, Inc. to document its compliance with Section 73.3555 of the FCC Rules. This exhibit pertains to the local ownership rules and the ownership of stations WSGS(FM), Hazard, Kentucky, WZQQ(AM), Hazard, Kentucky, WKIC(FM), Hyden, Kentucky; and WJMD(FM), Hazard, Kentucky. The sole purpose of this submission is to demonstrate compliance as WSGS(FM) proposes to increase height and change antenna.

A study has been performed of the predicted principal contours (3.16 mV/m for each FM station and 5.0 mV/m daytime for the AM station) of the four stations involved listing the parameters of each station is provided. The attached Exhibit E-1 shows a common area of overlap between FM stations WSGS(FM), WKIC(FM), WJMD(FM) and WZQQ(AM).

Commonly Owned Stations

<u>Freq/Channel</u>	<u>Call</u>	<u>Mode</u>	<u>Power kW</u>	<u>HAAT meters</u>	<u>Community</u>
1390 kHz	WZQQ(AM)	Lic	5.00	--	Hazard, KY
266C	WSGS(FM)	Prop	100	468	Hazard, KY
250C3	WKIC(FM)	Lic	1.75	368	Hyden, KY
284A	WJMD(FM)	Lic	0.480	346	Hazard, KY

The composite principal community contour overlap area is defined by stations WZQQ(AM), WSGS(FM), WKIC(FM), and WJMD(FM). Listed below are the AM and FM stations whose transmitter sites are found to be within the principal community contours which are contained within the proposed WSGS(FM) operation—see attached Exhibit E-2.

Non-Owned Stations Sites Within WSGS(FM) 70 dBu Contour

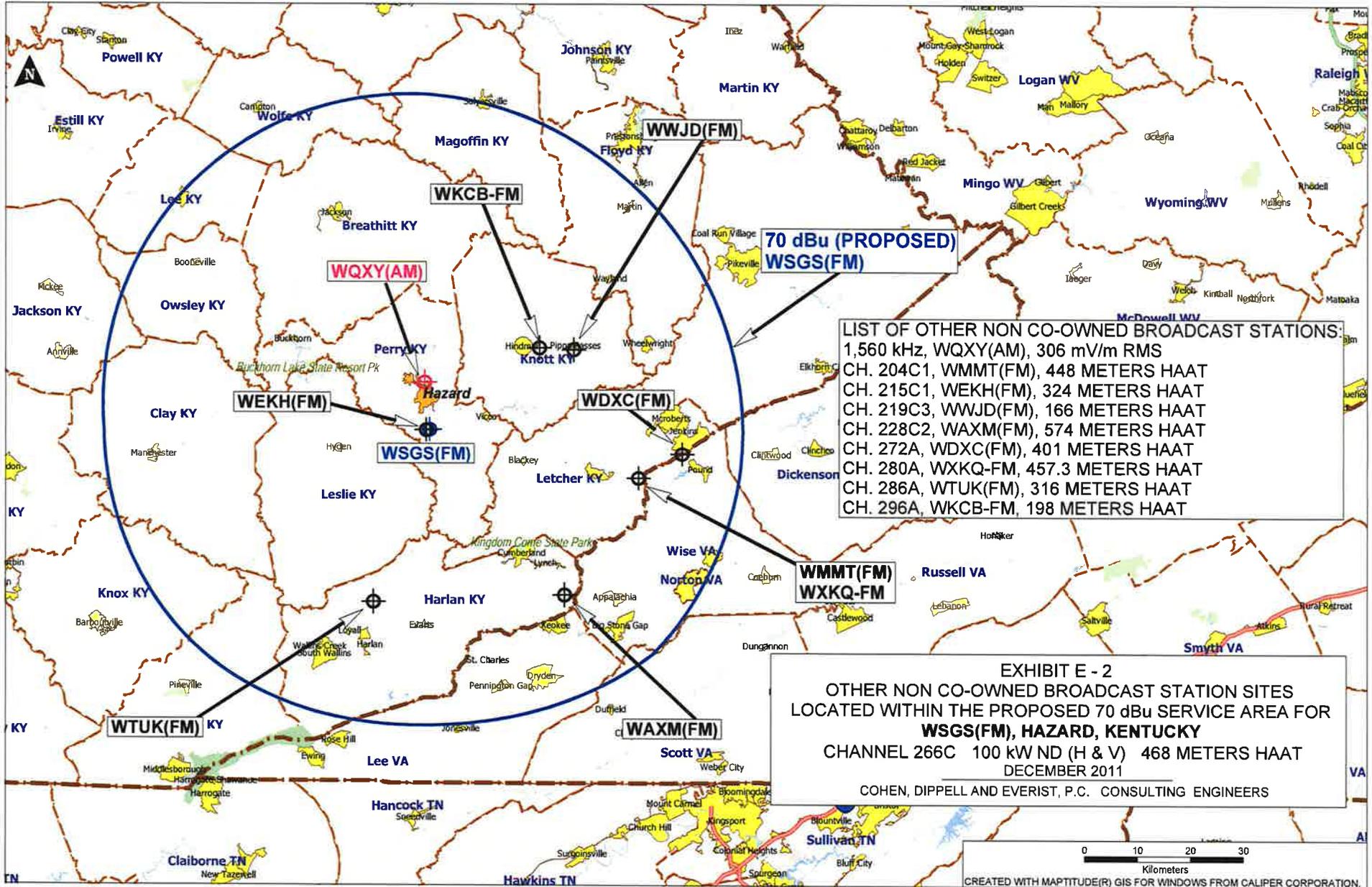
<u>Freq/Channel</u>	<u>Call</u>	<u>Mode</u>	<u>Power kW</u>	<u>HAAT meters</u>	<u>Community</u>
1560 kHz	WQXY(AM)	Lic	1.0	--	Hazard, KY

<u>Freq/Channel</u>	<u>Call</u>	<u>Mode</u>	<u>Power kW</u>	<u>HAAT meters</u>	<u>Community</u>
204C1	WMMT(FM)	Lic	15	448	Whitesburg, KY
215C1	WEKH(FM)	Lic	31	324	Hazard, KY
219C3	WWJD(FM)	Lic	7.3	166	Pippa Passes, KY
228C2	WAXM(FM)	Lic	2.45	574	Big Stone Gap, VA
272A	WDXC(FM)	Lic	0.350	401	Pound, VA
280A	WXKQ-FM	Lic	0.280	457.3	Whitesburg, KY
286A	WTUK(FM)	Lic	0.530	316	Harlan, KY
296A	WKCB-FM	Lic	1.55	198	Hindman, KY

To calculate the AM principal community contour, the FCC data base parameters have been used in connection with the methods outlined in Section 73.183 and 73.186 of the FCC Rules. The estimated M-3 conductivity values published by the FCC have been used. To predict the FM principal community service contour, the FCC data base was used to identify stations parameters and calculations of signal levels were performed by using Section 73.313 of the FCC Rules. The principal community contours for all three stations were calculated along azimuths for every 45 degrees and AM station was calculated along azimuth of every 10 degrees.

Summary

Certain principals of Mountain Broadcasting Service Inc., also have interests in the licensees of WKIC, Hyden, and WJMD, Hazard, KY. Within the WSGS(FM) proposed 70 dBu contour, there are sites of nine other non-owned broadcast stations. Therefore, Mountain Broadcasting Service, Inc. is in full compliance with Section 73.3555 of the FCC Rules.



**70 dBu (PROPOSED)
WSGS(FM)**

- LIST OF OTHER NON CO-OWNED BROADCAST STATIONS:**
- 1,560 kHz, WQXY(AM), 306 mV/m RMS
 - CH. 204C1, WMMT(FM), 448 METERS HAAT
 - CH. 215C1, WEKH(FM), 324 METERS HAAT
 - CH. 219C3, WWJD(FM), 166 METERS HAAT
 - CH. 228C2, WAXM(FM), 574 METERS HAAT
 - CH. 272A, WDXC(FM), 401 METERS HAAT
 - CH. 280A, WXXQ-FM, 457.3 METERS HAAT
 - CH. 286A, WTUK(FM), 316 METERS HAAT
 - CH. 296A, WKCB-FM, 198 METERS HAAT

EXHIBIT E - 2
OTHER NON CO-OWNED BROADCAST STATION SITES
LOCATED WITHIN THE PROPOSED 70 dBu SERVICE AREA FOR
WSGS(FM), HAZARD, KENTUCKY
CHANNEL 266C 100 kW ND (H & V) 468 METERS HAAT
DECEMBER 2011
 COHEN, DIPPELL AND EVERIST, P.C. CONSULTING ENGINEERS

0 10 20 30
 Kilometers
 CREATED WITH MAPTITUDE(R) GIS FOR WINDOWS FROM CALIPER CORPORATION.