

**RADIO MARKET ANALYSIS**  
**WRIGHT BROADCASTING SYSTEM, INC.**  
**KWEY-FM RADIO STATION**  
**CLINTON, OKLAHOMA**  
**KCDL RADIO STATION**  
**CORDELL, OKLAHOMA**  
**November 2006**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared of behalf of Wright Broadcasting Systems, Inc. ("WBS"), licensee of KWEY-FM, Channel 238C2, Clinton, Oklahoma and KCDL, Channel 257C3, Cordell, Oklahoma. WBS is submitting amendments to the pending applications to make minor changes in the facilities of both KWEY-FM and KCDL; therefore, an updated multiple ownership analysis is needed. WBS is also the licensee of KCLI, 1320 kHz, Clinton, Oklahoma and KWEY, 1590 kHz, Weatherford, Oklahoma. KWEY-FM, KCDL, KWEY and KCLI are not licensed to metro counties in any Arbitron/BIA rated markets, and are not considered "home" to any rated market. The city grade contours of all four stations have a common area of overlap as indicated in Exhibit #1. As such, a revised contour overlap analysis is needed.

2. A study has, therefore, been conducted to verify that the ownership of these stations is in compliance with the Commission's multiple ownership rules. The city grade contours of the four subject stations will be used to determine the number of other contributing stations in the market and will be referred to hereafter as the "Radio Market Boundary". No stations with

transmitters located more than 92.0 kilometers from the boundary of the common overlap of subject stations will be considered, nor will any WBS station be considered as a contributing station, unless it is a subject station in the market.

3. Exhibit #2 is a depiction of the AM and FM stations (commercial and non-commercial) providing service to the Radio Market. Exhibit #3 is a tabulation of the stations in the Radio Market, a total of eleven, including the four subject stations. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At this 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 stations in the market. Based on this number of facilities, it has been herein demonstrated that the minor change applications for stations KWEY-FM and KCDL are in compliance with the Commission's multiple ownership rules.

4. The foregoing technical statement was prepared on behalf of Wright Broadcasting Systems, 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**

**KCDL**  
Latitude: 35-26-43 N  
Longitude: 098-59-19 W  
ERP: 4.40 kW  
Channel: 257C3  
Frequency: 99.3 MHz

**KWEY-FM**  
Latitude: 35-26-43 N  
Longitude: 098-59-19 W  
ERP: 18.30 kW  
Channel: 238C2  
Frequency: 95.5 MHz

**KCLI**  
Latitude: 35-29-00 N  
Longitude: 098-58-54 W  
ERP: 1.00 kW  
Frequency: 1320.0 kHz

**KWEY**  
Latitude: 35-33-33 N  
Longitude: 098-43-11 W  
ERP: 1.00 kW  
Frequency: 1590.0 kHz

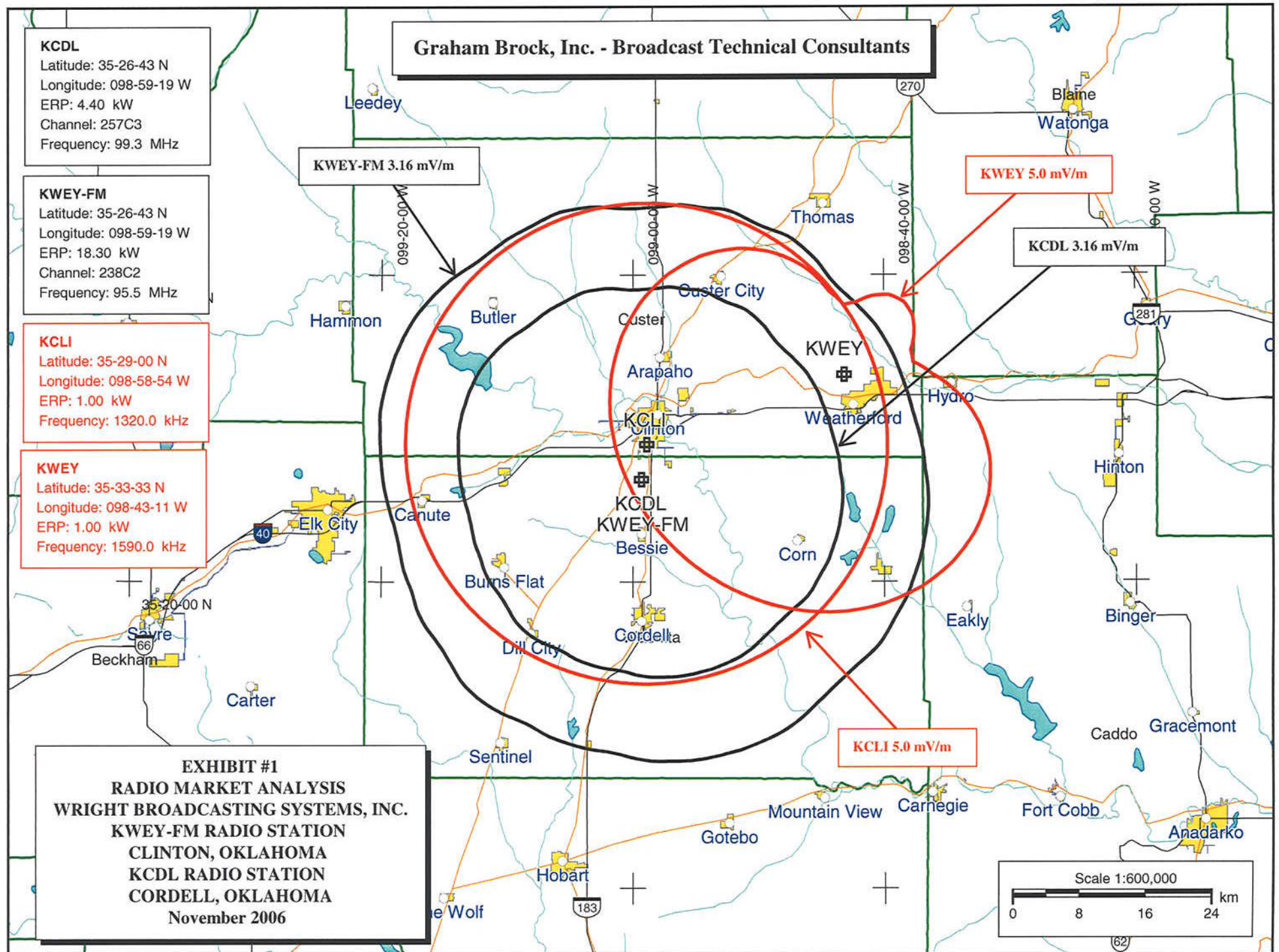
KWEY-FM 3.16 mV/m

KWEY 5.0 mV/m

KCDL 3.16 mV/m

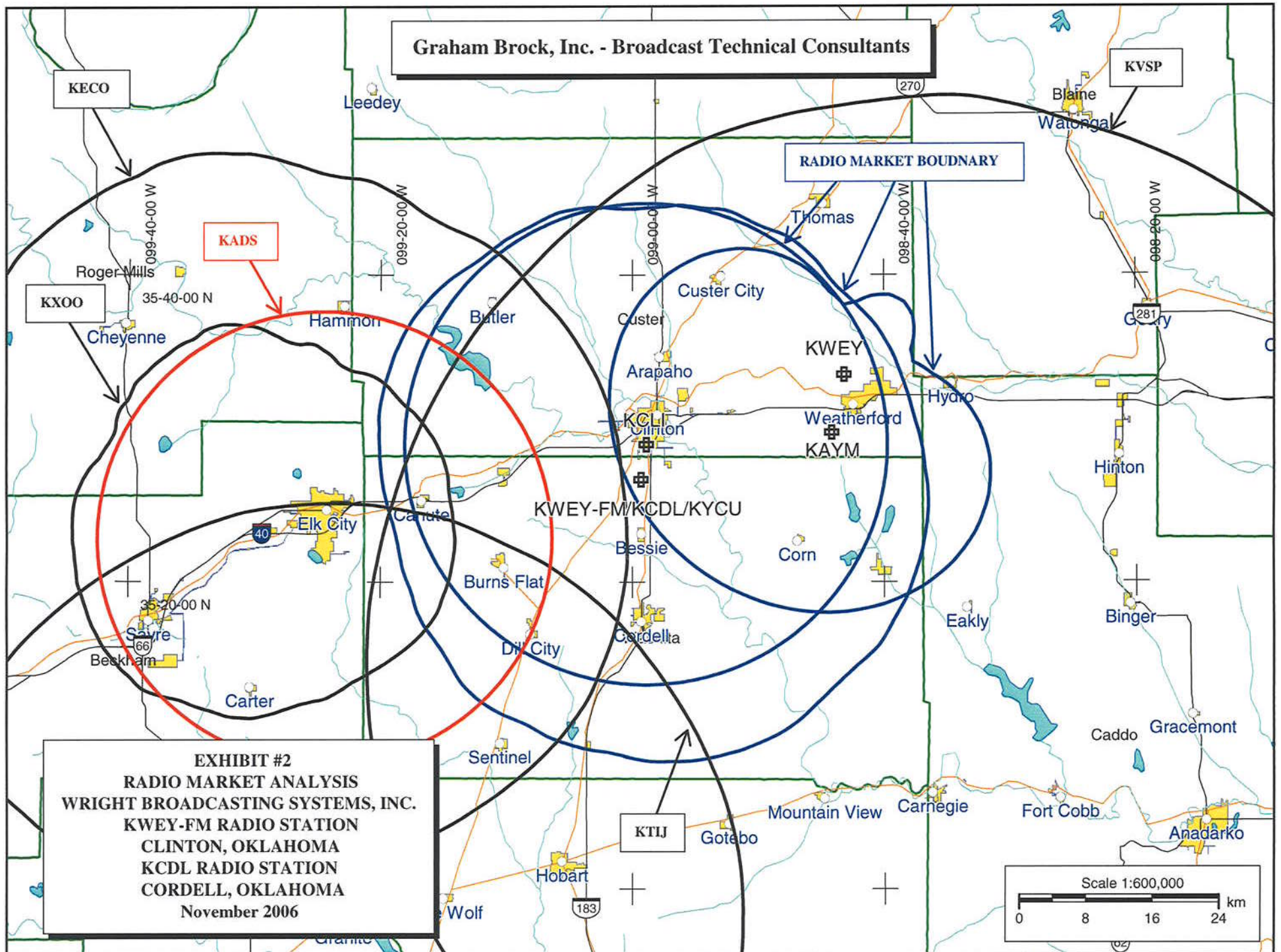
KCLI 5.0 mV/m

**EXHIBIT #1**  
**RADIO MARKET ANALYSIS**  
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**EXHIBIT #3**

**Tabulation of Stations in Radio Market**

**AM Stations**

+	KADS	1240 kHz	Elk City, Oklahoma
*	KCLI	1320 kHz	Clinton, Oklahoma
*	KWEY	1590 kHz	Weatherford, Oklahoma

Total AM Stations - 3

**FM Stations**

	KYCO	Ch 206C1	Clinton, Oklahoma
	KAYM	Ch 213A	Weatherford, Oklahoma
+	KXOO	Ch 232C3	Elk City, Oklahoma
*	KWEY-FM	Ch 238C2	Clinton, Oklahoma
+	KECO	Ch 243C1	Elk City, Oklahoma
*	KCDL	Ch 257C3	Cordell, Oklahoma
+	KVSP	Ch 278C	Anadarko, Oklahoma
+	KTIJ	Ch 295C1	Elk City, Oklahoma

Total FM Stations - 8

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 11**

- \* Subject station.
- + Contour provides service to Radio Market.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

*State of Georgia    )*  
*St. Simons Island    ) ss:*


*County of Glynn    )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Wright Broadcasting Systems, Inc., to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 28th day of November 2006.*



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Jefferson G. Brock  
*Affiant*

*Sworn to and subscribed before me  
this the 28th day of November 2006*



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*Notary Public, State of Georgia  
My Commission Expires: September 3, 2007*