

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
APPLETON, WISCONSIN

This radio multiple ownership analysis was prepared on behalf of Woodward Communications, Inc. (“Woodward”) concerning a radio multiple ownership analysis for the application for construction permit for radio station WAPL(FM) at Appleton, Wisconsin. This analysis was prepared under the FCC interim contour analysis method.* Considering the WAPL(FM) proposal and all other nearby radio stations attributable to Woodward, the following stations were analyzed:

Call Sign	City of License	Facilities
WHBY(AM)	Kimberly, WI	1150 kHz, 20 kW-D, 25 kW-N, U, DA-2
WSCO(AM)	Appleton, WI	1570 kHz, 1 kW-D, 0.331 kW-D, U
WZOR(FM)	Mishicot, WI	Ch. 234C3, 21.5 kW, 108 m
WKSZ(FM)	De Pere, WI	Ch. 240C3, 4.5 kW, 236 m
WECB(FM)	Seymour, WI	Ch. 282A, 5.6 kW, 104 m
WAPL(FM)	Appleton, WI	Ch. 289C, 100 kW, 496 m (proposed)

The principal community contours of all of these stations are depicted on a map included herein as Figure 1. The radio multiple ownership analysis considers only those stations with overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations). An ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

* See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

Radio Markets

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. As listed in the table below, there are three defined “radio markets” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	WHBY	WKSZ, WECB, WAPL
Market 2	WHBY	WZOR, WKSZ, WAPL
Market 3	WHBY, WSCO	WKSZ, WAPL

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations that have principal community contours that intersect the principal community contours that define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations, other than those in all three of the defined markets, were not considered in the count of stations. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Markets 1, 2 & 3	13 AM; 31 FM; 44 Total

Figure 2 is a tabulation of radio stations identified in the defined radio markets. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph described in Section 73.184 of the FCC Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.

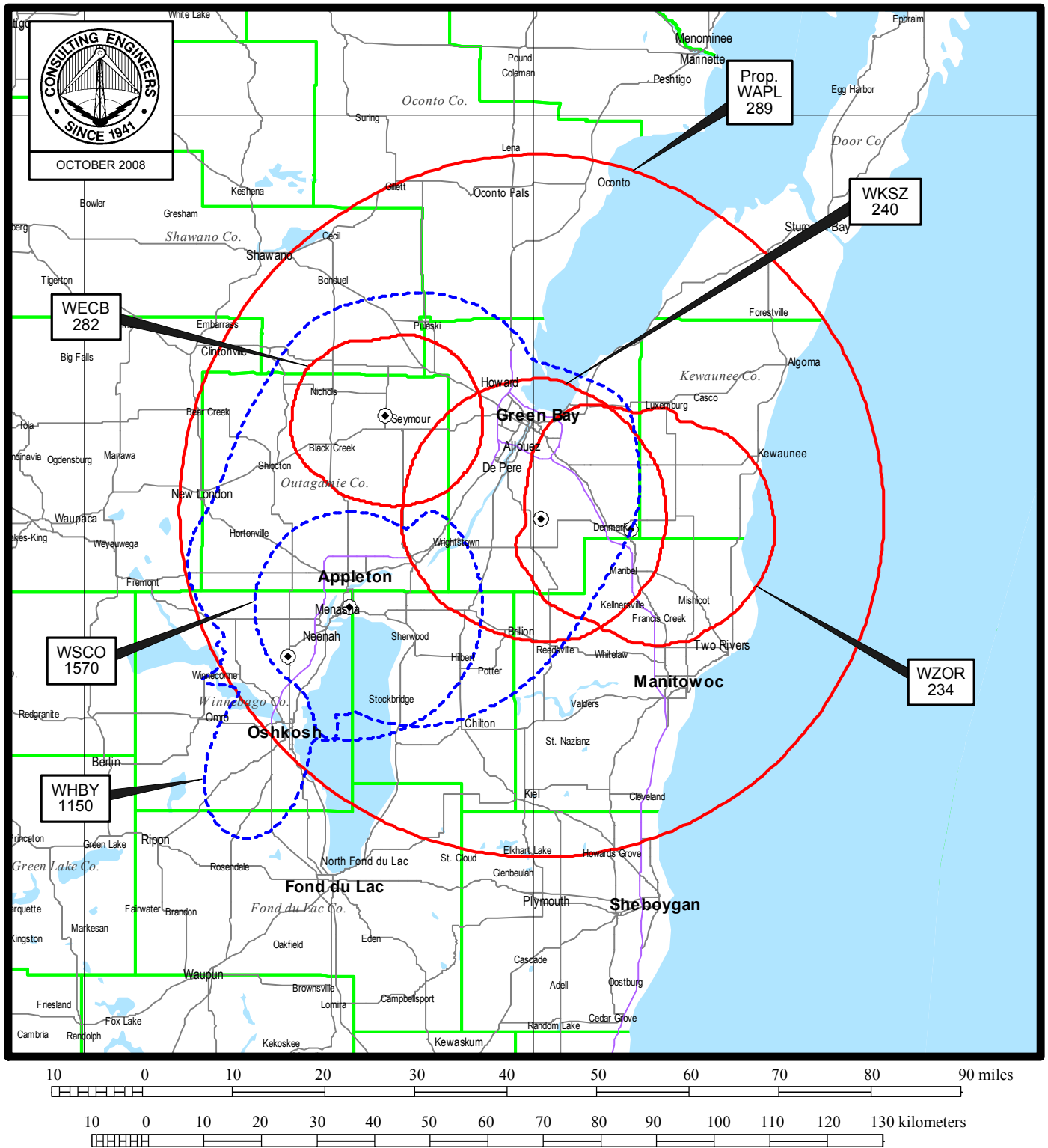


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Figure 1



PREDICTED PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

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Tabulation of Stations in Radio Markets

Markets 1, 2 & 3	
Number	Station
AM Stations	
1	WVCY, OSHKOSH, WI, 690 kHz
2	WCUB, TWO RIVERS, WI, 980 kHz
3	WJOK, KAUKAUNA, WI, 1050 kHz
4	WHBY, KIMBERLY, WI, 1150 kHz
5	WOMT, MANITOWOC, WI, 1240 kHz
6	WOCO, OCONTO, WI, 1260 kHz
7	WNAM, NEENAH-MENASHA, WI, 1280 kHz
8	WTAQ, GREEN BAY, WI, 1360 kHz
9	WDUZ, GREEN BAY, WI, 1400 kHz
10	WNFL, GREEN BAY, WI, 1440 kHz
11	WOSH, OSHKOSH, WI, 1490 kHz
12	WMBE, CHILTON, WI, 1530 kHz
13	WGBW, TWO RIVERS, WI, 1590 kHz
FM Stations	
1	WHID, GREEN BAY, WI, Ch. 201
2	WPNE-F, GREEN BAY, WI, Ch. 207
3	WORQ, GREEN BAY, WI, Ch. 211
4	WRST-F, OSHKOSH, WI, Ch. 212
5	WOVM, APPLETON, WI, Ch. 216
6	WEMY, GREEN BAY, WI, Ch. 218
7	WEMI, APPLETON, WI, Ch. 220
8	WLTU, MANITOWOC, WI, Ch. 221
9	WAUN-F, KEWAUNEE, WI, Ch. 224
10	WOZZ, NEW LONDON, WI, Ch. 228
11	WROE, NEENAH-MENASHA, WI, Ch. 232
12	WKSZ, DE PERE, WI, Ch. 240
13	WBDK, ALGOMA, WI, Ch. 244
14	WWWX, OSHKOSH, WI, Ch. 245
15	WTRW, TWO RIVERS, WI, Ch. 246
16	WLKN, CLEVELAND, WI, Ch. 251
17	WQLH, GREEN BAY, WI, Ch. 253

Markets 1, 2 & 3	
Number	Station
18	WOWN, SHAWANO, WI, Ch. 257
19	WZBY, STURGEON BAY, WI, Ch. 259
20	WNCY-F, NEENAH-MENASHA, WI, Ch. 262
21	WIXX, GREEN BAY, WI, Ch. 266
22	WRKU, FORESTVILLE, WI, Ch. 271
23	WQTC-F, MANITOWOC, WI, Ch. 272
24	WGB, KAUKAUNA, WI, Ch. 276
25	WVBO, WINNECONNE, WI, Ch. 280
26	WRLU, ALGOMA, WI, Ch. 281
27	WPCK, DENMARK, WI, Ch. 285
28	WAPL, APPLETON, WI, Ch. 289
29	WZNN, ALLOUEZ, WI, Ch. 294
30	WOCO-F, OCONTO, WI, Ch. 296
31	WDUZ-F, BRILLION, WI, Ch. 298