

Duopoly Study

Community Broadcasters, LLC (“Community Broadcasters”) is the proposed assignee in four assignment of license applications, including the instant application, to acquire the following stations:

WATN(AM), Watertown, New York (FIN: 11624)
WTOJ(FM), Carthage, New York (FIN: 11625)
Licensed to Clancy-Mance Communications, Inc.

WBDB(FM), Ogdensburg, New York (FIN: 66661)
WSLB(AM), Ogdensburg, New York (FIN: 66663)
WGIX-FM, Gouverneur, New York (FIN: 66658)
Licensed to Clancy-Mance Communications North, Inc.

WBDI(FM), Copenhagen, New York (FIN: 43748)
Licensed to Force Communications, Inc.

WOTT(FM), Henderson, New York (FIN: 30799)
Licensed to Jefferson Broadcasting, Inc.

As demonstrated in the attached analysis, Community Broadcasters’ proposed acquisition of these stations fully complies with the Commission’s multiple ownership rules. It should be noted that while Community Broadcasters is a party to a Joint Sales Agreement pursuant to which it will sell advertising time on station WBDR(FM), Cape Vincent, New York, Community Broadcasters will not have an attributable interest in WBDR(FM) since it will not sell more than 15% of the advertising time per week of the station.

JOHN J. MULLANEY
JOHN H. MULLANEY, P.E. (1994)
ALAN E. GEARING, P.E.
TIMOTHY Z. SAWYER

MULLANEY ENGINEERING, INC.
9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

301 921-0115 Voice
301 590-9757 Fax
Mullaney@MullEngr.com

ENGINEERING EXHIBIT EE:
PROPOSED COMMON OWNERSHIP OF
SEVEN RADIO STATIONS
IN AND AROUND WATERTOWN, NY

JULY 6, 2006

ENGINEERING STATEMENT IN SUPPORT OF
COMPLIANCE WITH
RADIO DUOPOLY RULES

Prepared On Behalf Of

Community Broadcasters, LLC



MULLANEY ENGINEERING, INC.

ENGINEERING EXHIBIT EE:

**PROPOSED COMMON OWNERSHIP OF
SEVEN RADIO STATIONS
IN AND AROUND WATERTOWN, NY**

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3. Appendix A, List of Common Stations.

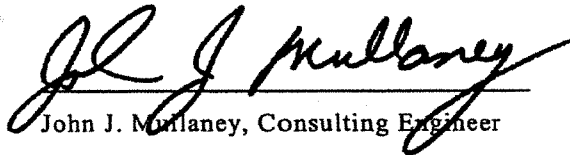
MULLANEY ENGINEERING, INC.

Declaration

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested to prepare the instant engineering exhibit which demonstrates that the proposed acquisition of seven radio stations in and around Watertown, NY, by Community Broadcasters, LLC, is in compliance with the Radio Duopoly Rules.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.


John J. Mullaney, Consulting Engineer

Executed on the 6th day of July 2006.

ENGINEERING EXHIBIT EE:

**PROPOSED COMMON OWNERSHIP OF
SEVEN RADIO STATIONS
IN AND AROUND WATERTOWN, NY**

NARRATIVE STATEMENT:

1. General:

This engineering statement has been prepared on behalf of Community Broadcasters, LLC ("Community"). The purpose of this statement is to establish that the common ownership of seven radio stations in and around Watertown, NY, by Community is in compliance with the radio duopoly rules. Community presently has no other radio ownership.

Community is requesting to have ownership interest in 7 stations consisting of 5 FM and 2 AM stations. However, as will be shown, there is no area which simultaneously receives city grade service from more than 2 common stations in the same service and no area simultaneously receives city grade service from more than 3 stations proposed to be under common control. Consequently, common ownership of these 7 stations consisting of 3 separate areas of 2 same service overlaps is permissible per Section 73.3555 provided the radio market consists of 8 stations in duopoly area 1 and 4 stations in duopoly area #3 (quantities including those under common control). Area #2 is a single common station which does not overlap any other common station.

Appendix A provides a list of the stations proposed to be under common control including their technical parameters.

II. Engineering Discussion:

A. Market Definition:

Section 73.3555 defines the "market" as the composite city grade coverage area of commonly owned facilities or proposals. The radio market is defined by the composite area generated by the 3.16 mV/m or the 70 dBu FM contours and by the 5.0 mV/m AM contours of all stations proposed to be under common control. Community is requesting to have ownership interest in 7 stations consisting of 5 FM and 2 AM stations in 3 separate markets.

B. Compliance With Radio Duopoly Rules:

Figure A is a map showing the city grade contours for all 7 stations proposed to be under common control.

Duopoly area #1 consists of 4 of the proposed stations (WTOJ, WBDI, WOTT & WATN(AM)) and all are part of the Watertown Arbitron radio market. The applicable section of 73.3555 permits the common ownership of these 4 stations with a maximum overlap of 2 FM and 1 AM station provided the radio market consists of at least 8 stations (including those stations under common ownership). The Watertown radio market consists of 10 stations (two more than required).

Duopoly area #2 consists of 1 of the proposed stations (WGIX). Since its city grade contour does not overlap any of the other 6 city grade contours the duopoly rules do not apply. It should be noted that WGIX is presently licensed at 3 kW but is operating under PTA with an ERP of 6 kW (both use

the same site and height). This map displays the 6 kW city grade contour since it represents a worst case condition.

Duopoly area #3 consists of 2 of the proposed stations (WBDB & WSLB(AM)). The applicable section of 73.3555 permits the common ownership of these 2 stations with a maximum overlap of 1 FM and 1 AM station provided the radio market consists of at least 4 stations (including those stations under common ownership). **Figure B** is a map which demonstrates that four other non-common stations have their tower site within the city grade contour of WSLB(AM). Thus, guaranteeing contour overlap. **This duopoly area consists of 6 stations** (two more than required).

C. Contour Calculations:

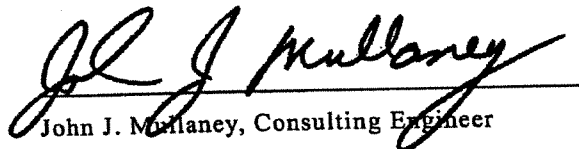
Terrain profile data for the FM facilities was extracted from NGDC 30 Second Digitized Terrain Data Base provided out of Boulder, Colorado. At least seventy-two bearings (every 5 degrees) were used to obtain the proposed coverage data.

The predicted service contours, as shown in the attached report, were computed using a mathematical model adapted for computer use of the data shown in Figure 1 of Section 73.333. This is the Commission's computer program TV FM FS REPORT RS-76-01.

The AM 5.0 mV/m (city) contours were determined using conductivity data from the FCC's M-3 conductivity map. The distance to the contours was determined using theoretical M-3 conductivity information.

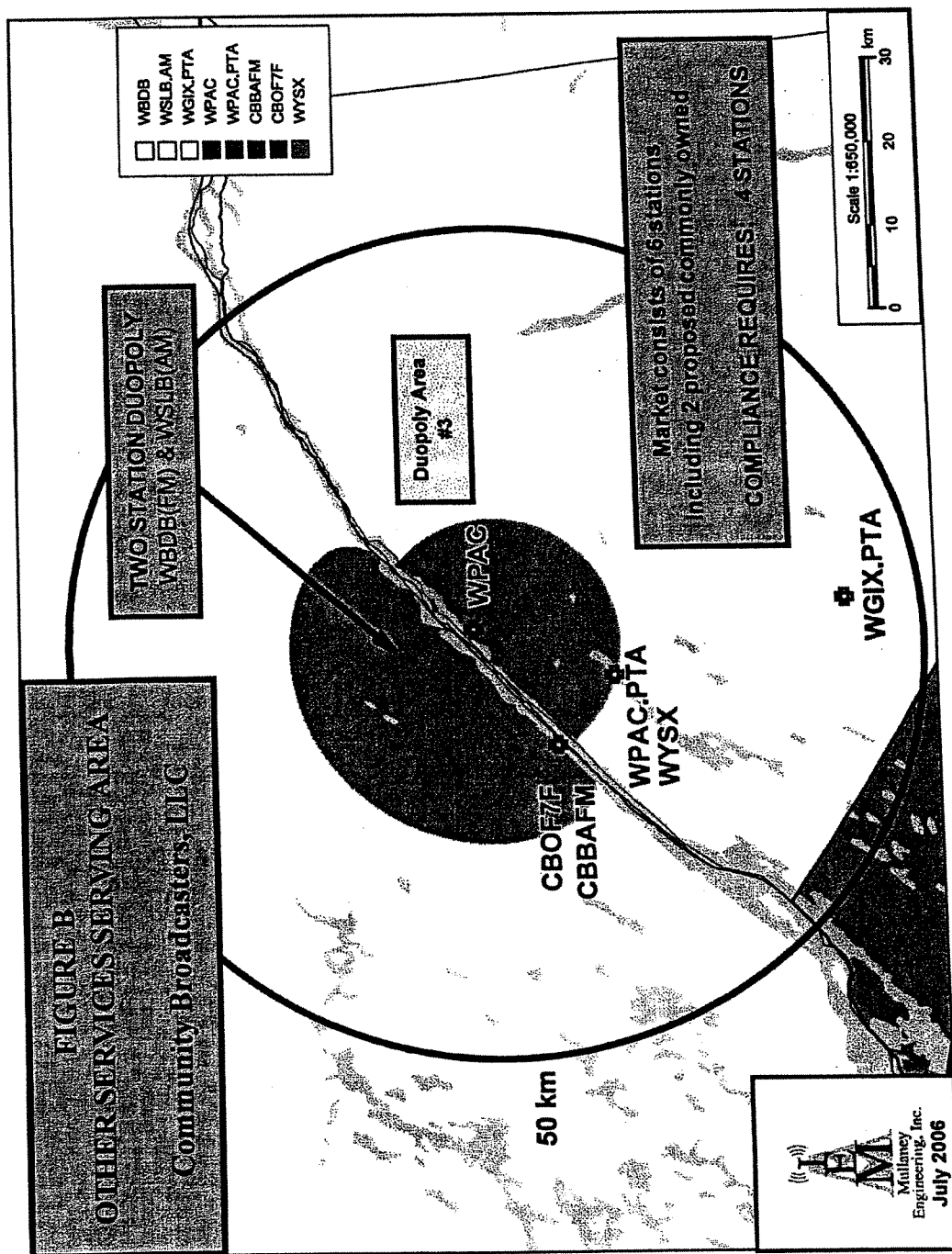
III. SUMMARY:

As shown herein, the proposed common ownership of these 7 stations must be analyzed as 3 separate duopoly areas. Each of the 3 areas receive service from more than the minimum number of non-common stations. Based upon this analysis it was concluded that the proposed common ownership of these 7 stations complies with the radio duopoly rules.



John J. Mullaney, Consulting Engineer

July 6, 2006.



JOHN J. MULLANEY
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ALAN E. GEARING, P.E.
TIMOTHY Z. SAWYER

MULLANEY ENGINEERING, INC.
9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

301 921-0115 Voice
301 590-9757 Fax
Mullaney@MullEngr.com

APPENDIX A:

LIST OF COMMON AM / FM STATIONS

**PROPOSED COMMON OWNERSHIP OF
SEVEN RADIO STATIONS
IN AND AROUND WATERTOWN, NY**

JULY 6, 2006

Prepared On Behalf Of
Community Broadcasters, LLC



AM Search Results

2 Records Found (2 Facilities)

DB Updated: 4/10/2006

<u>Call Sign</u>	<u>Status</u>	<u>Country / State / City</u>	<u>Last Update</u>	<u>File Number</u>		
<u>Frequency</u>	<u>Hours</u>	<u>Mode</u>	<u>Schedule</u>	<u>Class - Region 2</u>	<u>C/A</u>	<u>Antenna System ID</u>
<u>Current Owner</u>	<u>Longitude</u>	<u>CutOff Date</u>	<u>Facility ID</u>	<u>Fac. Status /Date</u>		
<u>Latitude</u>	<u>Theoretical RMS -mV/m</u>	<u>O Factor</u>	<u>Application ID</u>	<u>App Status - Date</u>		
<u>Power</u>	<u>IFRB List /Date</u>	<u>#Tower</u>	<u>Pat-Type</u>	<u>#Augs</u>	<u>Change List # / Date</u>	
<u>Status: Canadian / Mexican / Region 2</u>						

WATN	LIC	US NY WATERTOWN	5/29/1998	
1240kHz U	ND1 U	C C		14042
CLANCY-MANCE COMMUNICATIONS, INC				
N 43° 58' 49.0"	W 75° 56' 12.0"		11624	LICEN -
1.00(kW)	299.3 @1 km 186.0 @1 mi		310511	
		1 T	0	02038 - 03/27/1986
WSLB	LIC	US NY OGDENSBURG	8/21/1998	
1400kHz U	ND1 U	C C		21034
CLANCY-MANCE COMMUNICATIONS NORTH, INC.				
N 44° 42' 21.0"	W 75° 27' 55.0"		66663	LICEN -
1.00(kW)	415.2 @1 km 258.0 @1 mi		313620	
		1 T	0	02038 - 03/27/1986

FM Search Results

7 Records Found (5 Facilities)

DB Updated: 4/10/2006

Call Sign		Stat / Intl St		Country / State / City		File Number	
Freq	Service	Chan - Class - Intl	Current/Archive		Docket	73 215	Last Update
Current Owner		Make / Model / Spacing		Orientation		Facility ID	Fac. Status - Date
Antenna ID	DA	Longitude		ASRN	Tip AG	Application ID	App Status - Date
Latitude				AMSL		AGL	Max HAAT
H/V:	ERP	ERP Max	HAAT				
WBDB(wpac)	LIC	OPER	US NY	OGDENSBURG	BLH	19860613KD	
92.7 MHz	FM	224	A	B1	C	N	9/16/2003
CLANCY-MANCE COMMUNICATIONS NORTH, INC.							
N	///					66661	LICEN -
N 44° 42' 21.0"		W 75° 27' 55.0"			124.00	89294	GRANT - 5/15/1987
H/V: 3.00(kW)		95.0 m / 312 ft		189.0 m / 620 ft		104.0 m / 341 ft	119.0 m / 390 ft
WBDB(wwlf-fm)	LIC	OPER	US NY	COPENHAGEN	BLH	19940627KB	
106.7 MHz	FM	294	C3	B1	C	Y	3/21/2000
FORCE COMMUNICATIONS, INC							
14472	Y	ODD / ODD9303101B /		0		43748	LICEN -
N 43° 52' 47.0"		W 75° 43' 11.0"			305.00	200496	GRANT - 8/4/1995
H/V: 1.80(kW)		363.0 m / 1,191 ft		730.0 m / 2,395 ft		274.0 m / 899 ft	456.0 m / 1,496 ft
WGIX-FM	APP		US NY	GOVERNEUR	BMPH	20060330AFG	
95.3 MHz	FM	237	A		C	Y	3/31/2006
CLANCY-MANCE COMMUNICATIONS NORTH, INC.							
72272	Y	ODD / FORM 301 /		0		66658	LICEN -
N 44° 20' 22.0"		W 75° 24' 00.0"		1030200	88.00	1121481	ACCP - 3/31/2006
H/V: 6.00(kW)		100.0 m / 328 ft		274.0 m / 899 ft		85.0 m / 279 ft	150.0 m / 492 ft
WGIX-FM	CP		US NY	GOVERNEUR	BPH	20030508ABS	
95.3 MHz	FM	237	A	B1	C	Y	1/11/2005
CLANCY-MANCE COMMUNICATIONS NORTH, INC.							
68152	Y	ODD / FORM 301 /		0		66658	LICEN -
N 44° 20' 20.0"		W 75° 24' 01.0"		1030200	88.00	1026753	CPEXP - 2/16/2008
H/V: 6.00(kW)		100.0 m / 328 ft		274.0 m / 899 ft		85.0 m / 279 ft	150.0 m / 492 ft
WGIX-FM	LIC	OPER	US NY	GOVERNEUR	BLH	19980511KC	
95.3 MHz	FM	237	A	B1	C	N	4/22/1999
CLANCY-MANCE COMMUNICATIONS NORTH, INC.							
N	///					66658	LICEN -
N 44° 20' 20.0"		W 75° 24' 01.0"		1030200	88.00	266816	GRANT - 4/14/1999
H/V: 3.00(kW)		100.0 m / 328 ft		274.0 m / 899 ft		85.0 m / 279 ft	150.0 m / 492 ft
WOTT	LIC	OPER	US NY	HENDERSON	BLH	19921117KA	
100.7 MHz	FM	264	A	B1	C	N	5/29/1998
JEFFERSON BROADCASTING, INC.							
N	///					30799	LICEN -
N 43° 49' 13.0"		W 76° 05' 29.0"			94.00	178815	GRANT - 5/25/1993
H/V: 6.00(kW)		100.0 m / 328 ft		252.0 m / 827 ft		89.0 m / 292 ft	162.0 m / 531 ft
WTOJ	LIC		US NY	CARTHAGE	BLH	20001115AAK	
103.1 MHz	FM	276	A		C	N	3/6/2001
CLANCY-MANCE COMMUNICATIONS, INC.							
N	/// 10.00					11625	LICEN - 3/6/2001
N 43° 57' 15.0"		W 75° 43' 45.0"		1016048	176.00	534572	GRANT - 3/6/2001
H/V: 1.80(kW)		181.0 m / 594 ft		477.0 m / 1,565 ft		143.0 m / 469 ft	
4/10/2006							
Mullaney Engineering, Inc.							

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Mullaney Engineering, Inc.

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FCC Geographic Market Definition for Watertown, NY

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market		Owner	City & State of License	County of License
							Designtn	Home Mkt			
							Date	Rank			
WATN	AM	1240	C	Talk		Watertown, NY	07/02/2003	280	p Community Broadcasters LLC	Watertown, NY	Jefferson
WFRY	FM	97.5	C	Country		Watertown, NY	07/02/2003	280	Regent Communications, Inc	Watertown, NY	Jefferson
WNER	AM	1410	C	Sports		Watertown, NY	07/02/2003	280	Regent Communications, Inc	Watertown, NY	Jefferson
WTNY	AM	790	C	News/Talk		Watertown, NY	07/02/2003	280	Regent Communications, Inc	Watertown, NY	Jefferson
WTOJ	FM	103.1	C	AC		Watertown, NY	07/02/2003	280	p Community Broadcasters LLC	Carthage, NY	Jefferson
WCIZ	FM	93.3	C	Clsc Hits		Watertown, NY	07/02/2003	280	Regent Communications, Inc	Watertown, NY	Jefferson
WOTT	FM	100.7	C	ClRock/NwRc		Watertown, NY	07/02/2003	280	p Community Broadcasters LLC	Henderson, NY	Jefferson
WMHI	FM	94.7	NC	Christian		Watertown, NY	07/02/2003	280	Mars Hill Broadcasting Co., Inc.	Cape Vincent, NY	Jefferson
WBDR	FM	102.7	C	Country		Watertown, NY	07/02/2003	280	Clancy-Mance Communications North	Cape Vincent, NY	Jefferson
WBDI	FM	106.7	C	CHR		Watertown, NY	07/02/2003	280	p Community Broadcasters LLC	Copenhagen, NY	Lewis
WJNY	FM	90.9	NC	Classical		Watertown, NY	07/02/2003	280	Public Broadcasting Council of Central NY Inc	Watertown, NY	Jefferson
WRVJ	FM	91.7	NC	Nws/Tlk/Inf		Watertown, NY	07/02/2003	280	State University of New York	Watertown, NY	Jefferson
WSLJ	FM	88.9	NC	Variety		Watertown, NY	07/02/2003	280	St Lawrence University	Watertown, NY	Jefferson
WKWV	FM	90.1	NC	Relig Music		Watertown, NY	07/02/2003	280	Educational Media Foundation	Watertown, NY	Jefferson

Number of Stations in Geographic Market 14

Previous Stations in Geographic Market

WBDB	FM	92.7	C	CHR	02/02/2006	0	p Community Broadcasters LLC	Ogdensburg, NY	St Lawrence
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"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed