

RADIO MARKET ANALYSIS
SOUTHEASTER OHIO BROADCASTING SYSTEM, INC.
NEW FM RADIO STATION
PHILO, OHIO
October 2009

TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of Southeastern Ohio Broadcasting System, Inc. ("SEOBS"), the winning bidder for Channel 279A at McConnelsville, Ohio. SEOBS is submitting an application for a construction permit for the new FM facility, as such a Radio Market Analysis is required.¹ SEOBS is also the licensee of WHIZ, 1240 kHz, Zanesville, Ohio and WHIZ-FM, Channel 224B1, South Zanesville, Ohio.² Philo, Ohio, the proposed community of license for the new FM is not located in a metro county in any Arbitron rated market. Also, neither WHIZ or WHIZ-FM is licensed to a community in a metro county in any Arbitron rated market. Since there is overlap of city grade contours between the proposed new FM, WHIZ and WHIZ-FM, as shown on Exhibit #1, a review based on the modified contour overlap rules has been undertaken.

2. The overlap of contours between the new FM, WHIZ and WHIZ-FM results in a single distinct radio market. Therefore, a study has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. The city grade contours of the new FM, WHIZ and WHIZ-FM will be used to define the market boundary, hereinafter referred to as the "Radio Market". The study will determine the number of other commercial and

1) SEOBS is proposing to implement the new FM station at Philo, Ohio in lieu of McConnelsville, Ohio, as noted on Form 301.

2) SEOBS is also the licensee of WCVZ, Channel 273B, Zanesville, Ohio. WCVZ has submitted a Form 302-FM (BLH-20091005AAO) to implement the outstanding permit for WCVZ which authorizes a relocation, downgrade to Channel 273B1 and a change of community of license from Zanesville to Baltimore, Ohio. The relocation of WCVZ removes the contour overlap with the new FM facility. As such, WCVZ is not considered further in this study.

referred to as the "Radio Market". The study will determine the number of other commercial and non-commercial AM and FM stations that either have transmitter sites within, or provide coverage to, the Radio Market. Only those stations with transmitter sites within 92.0 kilometers will be considered as contributors to the market. No other station in which SEOBS has an interest will be considered, unless it is a subject station in the market under review.

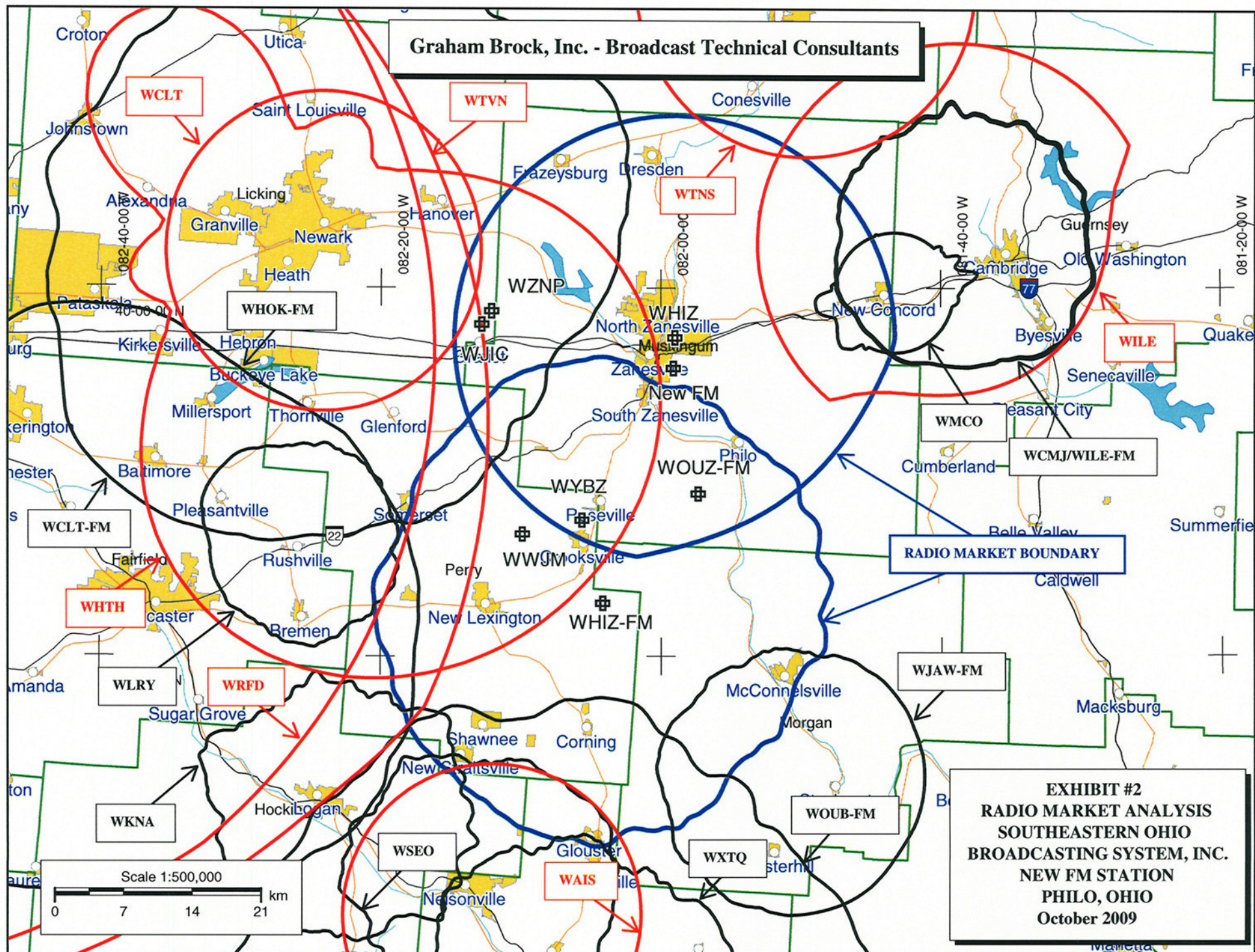
3. Exhibit #2 is a depiction of the stations within, or providing service to, the Radio Market boundary. A total of twenty-six stations is depicted, including the three subject stations. Exhibit #3 is a tabulation of the stations in the Radio Market. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules. At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.³ As such, the Radio Market is in compliance with the Commission's multiple ownership rules.

4. Based on SEOBS's interest in the new FM, WHIZ and WHIZ-FM, the proposed application for the new FM is in compliance with §73.3555 of the Commission's rules.

5. The foregoing technical statement was prepared on behalf of Southeastern Ohio Broadcasting System, 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

3) There are a sufficient number of stations in the market for ownership of three FM stations and one AM station to be in compliance with the Commission's rules, if WCVZ were considered a subject station in the market.

AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.3. BIA database. All data relating to AM and FM facilities was extracted from the Commission's CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.



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EXHIBIT #3

Tabulation of Stations in Radio Market

AM Stations

+	WTVN	610 kHz	Columbus, Ohio
+	WAIS	770 kHz	Buchtel, Ohio
+	WHTH	790 kHz	Heath, Ohio
+	WRFD	880 kHz	Columbus-Worthington, Ohio
*	WHIZ	1240 kHz	Zanesville, Ohio
+	WILE	1270 kHz	Cambridge, Ohio
+	WCLT	1430 kHz	Newark, Ohio
+	WTNS	1560 kHz	Coshocton, Ohio

Total AM Stations - 8

FM Stations

+	WLRY	Ch 205A	Rushville, Ohio
	WZNP	Ch 207A	Newark, Ohio
	WOUZ-FM	Ch 211A	Zanesville, Ohio
+	WMCO	Ch 214A	New Concord, Ohio
+	WOUB-FM	Ch 217B	Athens, Ohio
	WJIC	Ch 219A	Zanesville, Ohio
*	WHIZ-FM	Ch 224B1	South Zanesville, Ohio
+	WHOK-FM	Ch 238B	Lancaster, Ohio
+	WCMJ	Ch 244A	Cambridge, Ohio
+	WILE-FM	Ch 249A	Byesville, Ohio
+	WKNA	Ch 252A	Logan, Ohio
+	WCLT-FM	Ch 262B	Newark, Ohio
+	WJAW-FM	Ch 265A	McConnellsville, Ohio
*	New FM	Ch 279A	Philo, Ohio
+	WXTQ	Ch 288A	Athens, Ohio
	WWJM	Ch 290A	New Lexington, Ohio
	WYBZ	Ch 297A	Crooksville, Ohio
+	WSEO	Ch 299A	Nelsonville, Ohio

Total FM Stations - 18

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 26

- * Subject station.
- + Provides city grade coverage to radio market.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

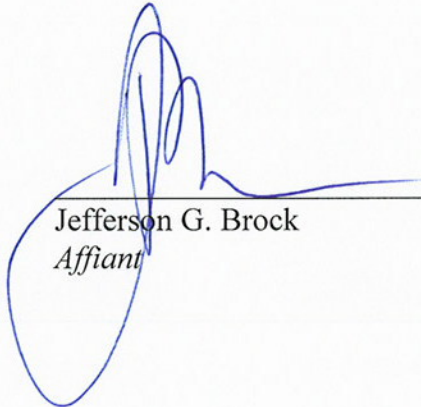
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Southeastern Ohio Broadcasting System, 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 5th day of October 2009.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 5th day of October 2009*



Notary Public, State of Georgia
My Commission Expires: June 16, 2012