

ENGINEERING STATEMENT  
ON BEHALF OF  
FIRST MEDIA RADIO, LLC  
RE SECTION 73.3555 OF THE FCC RULES

MAY 2003

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                )

Robert M. Gates, Jr., being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, has passed his Engineer in Training test in the State of Virginia, and is employed by Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio-Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, DC 20005.

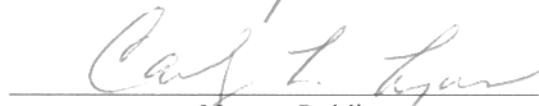
That his qualifications are a matter of record in the Federal Communications Commission;

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.

  
Robert M. Gates, Jr., EIT

Subscribed and sworn to before me this 12<sup>th</sup> day of May, 2003

  
Notary Public

My Commission Expires: 2/28/2008

This engineering statement and the attached figures were prepared on behalf of First Media Radio, LLC (“First Media”) and provides an analysis in accordance with Section 73.3555 of the FCC Rules. First Media proposes to acquire WCBT(AM), WSMY(AM), WKTC(FM), WYTT(FM), WLGQ(FM), WZAX(FM), WPTM(FM) and WSMY-FM. A study has been performed on the principal community contours and the multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership or time brokerage agreement:

<b>Call Sign</b>	<b>City of License</b>	<b>Facilities</b>
WWDR(AM) <sup>1</sup>	Murfreesboro, NC	1080 kHz, 1 kW, NDD
WCBT(AM)	Roanoke Rapids, NC	1230 kHz, 1 kW, ND1
WSMY(AM)	Weldon, NC	1400 kHz, 1 kW, ND1
WRMT(AM)	Rocky Mount, NC	1490 kHz, 1 kW, ND1
WKTC(FM)	Pinetops, NC	Channel 238C3, 12.5 kW, 140 m
WYTT(FM)	Gaston, NC	Channel 250A, 1.35 kW, 149 m
WDLZ(FM) <sup>2</sup>	Murfreesboro, NC	Channel 252A, 3 kW, 87 m
WSAY-FM	Rocky Mount, NC	Channel 253C3, 16 kW, 125 m
WLGQ(FM)	Emporia, VA	channel 258A, 1.27 kW, 153 m
WZAX(FM) <sup>3</sup>	Nashville, NC	Channel 259A, 6 kW, 100 m
WPTM(FM)	Roanoke Rapids, NC	channel 272A, 5.4 kW, 105 m
WSMY-FM	Alberta, VA	Channel 276A, 2.2 kW, 163 m

<sup>1</sup> There is a pending application (FCC File No. BP20020909AAN) to modify the facilities of WWDR(AM). This pending facility was included in the study.

<sup>2</sup> There is a granted construction permit (FCC File No. BPH20020909AAK) to modify the facilities of WDLZ(FM). This facility was included in the study.

<sup>3</sup> There is a pending application (FCC File No. BPH20020924AAX) to modify the facilities of WZAX(FM). This pending facility was included in the study.

Since certain of these stations have overlapping principal community contours (5 mV/m for AM stations and 3.16 mV/m for FM stations), an ownership study has been prepared in accordance with the Federal Communications Commission multiple ownership rules.<sup>4</sup>

The principal community coverage contour of WSMY-FM does not overlap with any radio stations under present or proposed common ownership or time brokerage and the station therefore, was not studied further.

Based on FCC Rule Section 73.3555(a)(2), the principal community coverage contours of WWDR(AM) and WDLZ(FM) do not overlap with any radio stations under present or proposed common ownership or time brokerage agreement and these stations therefore, were not studied further.

#### 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 commonly owned stations. The predicted principal contours of WWDR(AM), WCBT(AM), WSMY(AM), WRMT(AM), WKTC(FM), WYTT(FM), WDLZ(FM), WSAY-FM, WLGQ(FM), WZAX(FM), WPTM(FM) and WSMY-FM are shown in Exhibit 1 herein. There are four “radio markets” for analysis under the Commission’s Rules. Exhibit 1A is a detailed map showing Markets 3 and 4.

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<sup>4</sup> See Section 73.3555 of the FCC Rules.

Market 1 is defined by the principal community contours of WYTT(FM), WLGQ(FM) and WPTM(FM).

Market 2 is defined by the principal community contours of WCBT(AM), WSMY(AM), WYTT(FM) and WPTM(FM).

Market 3 is defined by the principal community contours of WRMT(AM), WSAY-FM and WZAX(FM)(LIC) or WZAX(FM)(APP).

Market 4 is defined by the principal community contours of WRMT(AM), WKTC(FM), WSAY-FM and WZAX(FM)(LIC).

#### Count of Stations in Defined Markets

The number of radio stations in each of the “radio markets” is determined by counting the operating, commercial stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject co-owned stations.

In each of Markets 1 and 2, there are 10 radio stations (4 AM and 6 FM), including the subject co-owned stations, that intersect or overlap the “radio market.”

In each of Markets 3 and 4, there are at least 20 radio stations (7 AM and 13 FM), including the subject co-owned stations, that intersect or overlap the “radio market.”

Tables 1, 2, 3 and 4 are the tabulation of the radio stations identified in each of the defined radio markets. Only known licensed, operating commercial stations were employed for the study. Distances to contours for AM stations were predicted using the antenna patterns as

identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR Section 73.184 of the FCC Rules. The ground conductivities were obtained from the estimated values abstracted from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR Section 73.313 of the FCC Rules. Terrain data was derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials spaced every 10 degrees of azimuth.

Based on the above, it is concluded that the proposed modifications comply with Section 73.3555(a) of the FCC Rules.

Cohen, Dippell and Everist, P.C.

TABLE 1  
TABULATION OF ALL COMMERCIAL AM AND FM STATIONS  
WITHIN THE COMPOSITE AREA FOR  
MARKET ONE  
MAY 2003

Tabulation of AM Stations in Defined Radio Market 1

COUNT	<u>Call Sign</u>	<u>City of License</u>	<u>Frequency</u> (KHz)	<u>ERP</u> (kw)	<u>Latitude</u>	<u>Longitude</u>	<u>Class</u>	<u>Pattern</u>
1	WLES	LAWRENCEVILLE, VA	580	0.5	36-45-10.0 N	77-51-49.0 W	D	ND1
2	WCBT	ROANOKE RAPIDS, NC	1230	1	36-26-45.0 N	77-39-51.0 W	C	ND1
3	WEVA	EMPORIA, VA	860	1	36-41-56.0 N	77-32-55.0 W	D	NDD
4	WSMY	WELDON, NC	1400	1	36-24-43.0 N	77-37-06.0 W	C	ND1

Tabulation of FM Stations in Defined Radio Market 1

COUNT	<u>Call Sign</u>	<u>City of License</u>	<u>Channel</u>	<u>ERP</u> (kw)	<u>Latitude</u>	<u>Longitude</u>	<u>Class</u>	<u>HAAT</u> (m)
1	WYFL	HENDERSON, NC	223	100	36-13-23.0 N	78-12-07.0 W	C	311
2	WYTT	GASTON, NC	250	1.35	36-27-38.0 N	77-33-52.0 W	A	149
3	WLQ	EMPORIA, VA	258	1.27	36-39-20.0 N	77-34-22.0 W	A	153
4	WTRG	ROCKY MOUNT, NC	264	100	35-49-53.0 N	78-08-50.0 W	C	600
5	WPTM	ROANOKE RAPIDS, NC	272	5.4	36-30-12.0 N	77-44-47.0 W	A	105
6	WFXX	TARBORO, NC	282	100	36-02-22.0 N	78-03-44.0 W	C1	299

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TABLE 1  
TABULATION OF ALL COMMERCIAL AM AND FM STATIONS  
WITHIN THE COMPOSITE AREA FOR  
MARKET TWO  
MAY 2003

Tabulation of AM Stations in Defined Radio Market 2

<u>COUNT</u>	<u>Call Sign</u>	<u>City of License</u>	<u>Frequency</u> (KHz)	<u>ERP</u> (kw)	<u>Latitude</u>	<u>Longitude</u>	<u>Class</u>	<u>Pattern</u>
1	WLES	LAWRENCEVILLE, VA	580	0.5	36-45-10.0 N	77-51-49.0 W	D	ND1
2	WCBT	ROANOKE RAPIDS, NC	1230	1	36-26-45.0 N	77-39-51.0 W	C	ND1
3	WEVA	EMPORIA, VA	860	1	36-41-56.0 N	77-32-55.0 W	D	NDD
4	WSMY	WELDON, NC	1400	1	36-24-43.0 N	77-37-06.0 W	C	ND1

Tabulation of FM Stations in Defined Radio Market 2

<u>COUNT</u>	<u>Call Sign</u>	<u>City of License</u>	<u>Channel</u>	<u>ERP</u> (kw)	<u>Latitude</u>	<u>Longitude</u>	<u>Class</u>	<u>HAAT</u> (m)
1	WYFL	HENDERSON, NC	223	100	36-13-23.0 N	78-12-07.0 W	C	311
2	WYTT	GASTON, NC	250	1.35	36-27-38.0 N	77-33-52.0 W	A	149
3	WLQ	EMPORIA, VA	258	1.27	36-39-20.0 N	77-34-22.0 W	A	153
4	WTRG	ROCKY MOUNT, NC	264	100	35-49-53.0 N	78-08-50.0 W	C	600
5	WPTM	ROANOKE RAPIDS, NC	272	5.4	36-30-12.0 N	77-44-47.0 W	A	105
6	WFXX	TARBORO, NC	282	100	36-02-22.0 N	78-03-44.0 W	C1	299



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TABLE 2  
TABULATION OF ALL COMMERCIAL AM AND FM STATIONS  
WITHIN THE COMPOSITE AREA FOR  
MARKET THREE  
MAY 2003

Tabulation of AM Stations in Defined Radio Market 3

COUNT	<u>Call Sign</u>	<u>City of License</u>	<u>Frequency</u> (KHz)	<u>ERP</u> (kw)	<u>Latitude</u>	<u>Longitude</u>	<u>Class</u>	<u>Pattern</u>
1	WETC	WENDELL-ZEBULON, NC	540	4	35-52-09.0 N	78-25-56.0 W	B	DA2
2	WGTM	WILSON, NC	590	5	35-43-04.0 N	78-03-33.0 W	B	DA2
3	WCPS	TARBORO, NC	760	1	35-55-40.0 N	77-34-15.0 W	D	NDD
4	WLLY	WILSON, NC	1350	1	35-43-24.0 N	77-55-16.0 W	D	ND1
5	WEED	ROCKY MOUNT, NC	1390	5	35-57-41.0 N	77-49-32.0 W	B	DAN
6	WVOT	WILSON, NC	1420	1	35-44-08.0 N	77-53-02.0 W	B	DAN
7	WRMT	ROCKY MOUNT, NC	1490	1	35-55-57.0 N	77-49-49.0 W	C	ND1

Tabulation of FM Stations in Defined Radio Market 3

COUNT	<u>Call Sign</u>	<u>City of License</u>	<u>Channel</u>	<u>ERP</u> (kw)	<u>Latitude</u>	<u>Longitude</u>	<u>Class</u>	<u>HAAT</u> (m)
1	WRSV	ROCKY MOUNT, NC	221	2.35	35-48-40.0 N	77-44-33.0 W	A	162
2	WYFL	HENDERSON, NC	223	100	36-13-23.0 N	78-12-07.0 W	C	311
3	WERO	WASHINGTON, NC	227	100	35-21-55.0 N	77-23-38.0 W	C	543
4	WQDR	RALEIGH, NC	234	95	35-40-35.0 N	78-32-09.0 W	C	512
5	WKTC	PINETOPS, NC	238	12.5	35-56-45.0 N	77-39-37.0 W	C3	140
6	WYMY	GOLDSBORO, NC	245	99	35-23-52.0 N	78-08-07.0 W	C	300
7	WSAY-FM	ROCKY MOUNT, NC	253	16	35-54-43.0 N	77-50-06.0 W	C3	125
8	WZAX	NASHVILLE, NC	259	6	35-57-01.0 N	77-57-26.0 W	A	100
9	WTRG	ROCKY MOUNT, NC	264	100	35-49-53.0 N	78-08-50.0 W	C	600
10	WRAL	RALEIGH, NC	268	96	35-40-35.0 N	78-32-09.0 W	C	555
11	WFXX	TARBORO, NC	282	100	36-02-22.0 N	78-03-44.0 W	C1	299
12	WRDU	WILSON, NC	291	100	35-45-36.0 N	78-11-04.0 W	C	411
13	WNCT-FM	GREENVILLE, NC	300	100	35-21-55.0 N	77-23-38.0 W	C	518

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TABLE 2  
TABULATION OF ALL COMMERCIAL AM AND FM STATIONS  
WITHIN THE COMPOSITE AREA FOR  
MARKET FOUR  
MAY 2003

Tabulation of AM Stations in Defined Radio Market 4

<u>COUNT</u>	<u>Call Sign</u>	<u>City of License</u>	<u>Frequency</u> (KHz)	<u>ERP</u> (kw)	<u>Latitude</u>	<u>Longitude</u>	<u>Class</u>	<u>Pattern</u>
1	WETC	WENDELL-ZEBULON, NC	540	4	35-52-09.0 N	78-25-56.0 W	B	DA2
2	WGTM	WILSON, NC	590	5	35-43-04.0 N	78-03-33.0 W	B	DA2
3	WCPS	TARBORO, NC	760	1	35-55-40.0 N	77-34-15.0 W	D	NDD
4	WLLY	WILSON, NC	1350	1	35-43-24.0 N	77-55-16.0 W	D	ND1
5	WEED	ROCKY MOUNT, NC	1390	5	35-57-41.0 N	77-49-32.0 W	B	DAN
6	WVOT	WILSON, NC	1420	1	35-44-08.0 N	77-53-02.0 W	B	DAN
7	WRMT	ROCKY MOUNT, NC	1490	1	35-55-57.0 N	77-49-49.0 W	C	ND1

Tabulation of FM Stations in Defined Radio Market 4

<u>COUNT</u>	<u>Call Sign</u>	<u>City of License</u>	<u>Channel</u>	<u>ERP</u> (kw)	<u>Latitude</u>	<u>Longitude</u>	<u>Class</u>	<u>HAAT</u> (m)
1	WRSV	ROCKY MOUNT, NC	221	2.35	35-48-40.0 N	77-44-33.0 W	A	162
2	WYFL	HENDERSON, NC	223	100	36-13-23.0 N	78-12-07.0 W	C	311
3	WERO	WASHINGTON, NC	227	100	35-21-55.0 N	77-23-38.0 W	C	543
4	WQDR	RALEIGH, NC	234	95	35-40-35.0 N	78-32-09.0 W	C	512
5	WKTC	PINETOPS, NC	238	12.5	35-56-45.0 N	77-39-37.0 W	C3	140
6	WYMY	GOLDSBORO, NC	245	99	35-23-52.0 N	78-08-07.0 W	C	300
7	WSAY-FM	ROCKY MOUNT, NC	253	16	35-54-43.0 N	77-50-06.0 W	C3	125
8	WZAX	NASHVILLE, NC	259	6	35-57-01.0 N	77-57-26.0 W	A	100
9	WTRG	ROCKY MOUNT, NC	264	100	35-49-53.0 N	78-08-50.0 W	C	600
10	WRAL	RALEIGH, NC	268	96	35-40-35.0 N	78-32-09.0 W	C	555
11	WFXK	TARBORO, NC	282	100	36-02-22.0 N	78-03-44.0 W	C1	299
12	WRDU	WILSON, NC	291	100	35-45-36.0 N	78-11-04.0 W	C	411
13	WNCT-FM	GREENVILLE, NC	300	100	35-21-55.0 N	77-23-38.0 W	C	518

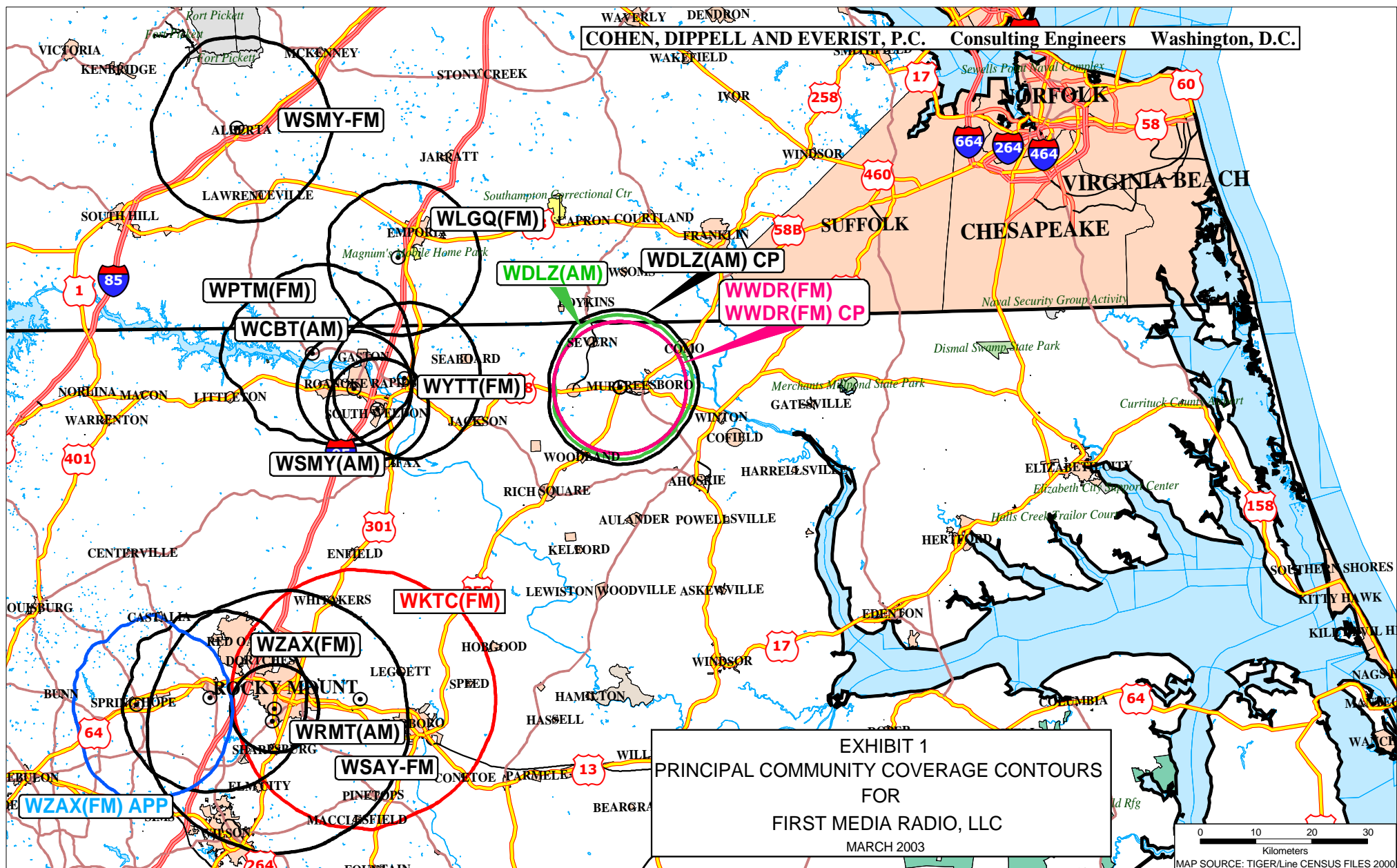


EXHIBIT 1  
PRINCIPAL COMMUNITY COVERAGE CONTOURS  
FOR  
FIRST MEDIA RADIO, LLC  
MARCH 2003

COHEN, DIPPELL AND EVERIST, P.C. Consulting Engineers Washington, D.C.

