

**RADIO MARKET ANALYSIS**  
**LAKES MEDIA HOLDING COMPANY, LLC**  
**WICE - CLARKSVILLE, VIRGINIA**  
**WSHV/WKSK-FM - SOUTH HILL, VIRGINIA**  
**November 2004**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Lakes Media Holdings Company, LLC ("LMHC"), proposed assignee of stations WICE, Channel 252C3, Clarksville, Virginia; WSHV, 1370 kHz, South Hill, Virginia; and WKSK-FM, Channel 270A, South Hill, Virginia.<sup>1</sup> LMHC will also be providing programming to station WFXQ, Channel 260C3, Chase City, Virginia under a Time Brokerage Agreement ("TBA").<sup>2</sup> None of these stations' licensed communities are located in any Arbitron rated markets, as such the revised contour overlap rules apply to this acquisition. Based on the overlap of the city grade contours of the various stations, two distinct markets are created. Market #1 consists of AM station WSHV and FM stations WKSK-FM and WFXQ (both license and application at Chase City), while Market #2 consists of FM stations WICE and WFXQ (both license and application at Chase City). A map showing the city grade contours of the stations is attached as Exhibit #1.

2. A study has, therefore, been conducted to verify the proposed transfer of control is in compliance with the Commission's multiple ownership rules. The city grade contours of the

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1) WKSK-FM has a former licensed facility on Channel 255C3, South Hill, Virginia. However, WKSK-FM was ordered to Channel 270A in MB Docket #03-47. WKSK-FM is presently operating under program test with the facilities authorized in BPH-20030828APF, and a license to cover the permit has been submitted to the Commission (BLH-20040526ABK). As such, the former Channel 255C3 license is not considered in this instant review.

2) In addition to the licensed facilities of WFXQ, there are two pending applications; one to relocate the facility in Chase City, Virginia (BPH-20021022AAU) and another to implement a change in community of license to Creedmoor, North Carolina (BPH-20040809AAJ). Only the Chase City facilities involve the contour overlap rules. Once WFXQ is operating in Creedmoor, there is no overlap between it and any of the remaining stations.

subject stations will be used to determine the number of other commercial AM or FM stations that either have transmitter sites within, or provide coverage to, the subject stations' contours, hereinafter described as the "Radio Market". Since WFXQ is a subject station in each market, its contour will be used to define the Radio Market Boundary, with the subject stations in the relevant market added. No other LMHC stations will be considered market contributors, unless they are subject stations in the market under review. Further, no transmitters located more than 92.0 kilometers from the boundary of the common overlap of subject stations will be considered.

3. Exhibit #2 is a depiction of the AM and FM stations (commercial and non-commercial) providing service to the WFXQ contour. There are four AM and FM stations providing service to the Radio Market.<sup>3</sup> Exhibit #3 is a tabulation of the stations in Radio Market #1 (WSHV/WKSK-FM/WFXQ), including the three 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. Therefore, Radio Market #1 is in compliance with the rules.

4. Exhibit #4 is a tabulation of the stations in Radio Market #2 (WICE/WFXQ), including the two 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. Therefore, Radio Market #2 is in compliance with the rules.

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3) There are additional stations, but they were not considered since the number of stations shown was adequate to demonstrate compliance based on the number of stations to be commonly held.

5. Based on LMHC's interests in the above referenced stations, in two separate markets, it has been herein demonstrated that the proposed transfer of control of WICE, WKSK-FM, and WSHV to LMHC is in compliance with §73.3555 of the Commission's rules.<sup>4</sup>

6. The foregoing technical statement was prepared on behalf of Lakes Media Holding Company, LLC, 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.

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4) The TBA with station WFXQ is also in compliance with the rules.