

EXHIBIT 14
Radio Multiple Ownership Study
and
Radio-Television Cross Ownership Study

prepared for
ShootingStar Broadcasting of New England, LLC

WNDS(TV), Ch. 50 Derry, New Hampshire (Facility ID 14682)
WILD(AM), 1090 KHz Boston, Massachusetts (Facility ID 47413)
WBOT(FM), 97.7 MHz Brockton, Massachusetts (Facility ID 19633)
WAKX(FM), 102.7 MHz Narragansett Pier, Rhode Island (Facility ID 22874)
WWKX(FM), 106.3 MHz Woonsocket, Rhode Island (Facility ID 65198)

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Introduction

This statement has been prepared on behalf of *ShootingStar Broadcasting of New England, LLC* ("*ShootingStar*") to show compliance with Section 73.3555(a) of the FCC Rules regarding common ownership of multiple radio stations serving the same market, and with §73.3555(c) concerning the common ownership of radio and television stations serving the same market.¹

ShootingStar is proposing to acquire WNDS(TV), Ch. 50 Derry, New Hampshire (Facility ID 14682). As explained in **Exhibit 11** of the application, *Alta Communications* ("*Alta*") will hold an attributable interest in *ShootingStar*. As discussed in "**Attachment A**" to **Exhibit 11**, *Alta* similarly holds attributable interests in the licensees of radio stations WILD(AM), 1090 KHz Boston, Massachusetts (Facility ID 47413), WBOT(FM), 97.7 MHz Brockton, Massachusetts (Facility ID 19633), WAKX(FM), 102.7 MHz Narragansett Pier, Rhode Island (Facility ID 22874), and WWKX(FM), 106.3 MHz Woonsocket, Rhode Island (Facility ID 65198). This exhibit will address the "common ownership" of these facilities and demonstrate that *ShootingStar's* acquisition of Station WNDS(TV) complies with the Commission's ownership rules.

Radio-Television Cross Ownership

The radio-television cross ownership rule — 47 CFR §73.3555(c) — is triggered when the "Grade A" contour of a television station entirely encompasses the community of license of a

¹ In accordance with the FCC Public Notice issued September 10, 2003 (DA 03-2867), references to Section 73.3555 of the Commission's Rules herein refer to the Rules in effect prior to *Report and Order* in MB Docket No. 02-277 and MM Docket Nos. 01-235, 01-317, and 00-244 (adopted June 2, 2003). The United States Court of Appeals for the Third Circuit has stayed the effectiveness date of the rules adopted in this *Report and Order* (see *Prometheus Radio Project v. FCC*, No. 03-3388 (3d Cir. Sept. 3, 2003)).

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commonly owned AM or FM radio station. Additionally, the rule is triggered when the “60 dB μ ” (1 mV/m) FM station contour or the “2 mV/m” AM station contour entirely encompasses the community of license of a commonly owned television station.

As illustrated in **Exhibit 14 - Figure 1**, none of the predicted 60 dB μ contours of WBOT(FM), WAKX(FM) or WWKX(FM), or the predicted 2 mV/m contour of WILD(AM), presently encompass Derry, New Hampshire. Further, the predicted Grade A (74 dB μ) service contour of WNDS(TV) does not encompass any portion of the communities of license for WBOT(FM), WAKX(FM), WWKX(FM), or WILD(AM). Thus, the Radio-Television cross ownership issues of §73.3555(c) are not triggered by *ShootingStar*’s proposed acquisition of WNDS(TV).

Radio Multiple Ownership

Under current FCC ownership rules, a “market” is defined as the area encompassed by the overlapping principal community contours of the radio stations which are commonly owned.² Accordingly, an evaluation has been made of the locations of the principal community contours of the various radio stations in which *Alta* holds an attributable interest. Depicted in **Exhibit 14 - Figure 2** are the principal community coverage contours (70 dB μ) of the identified FM stations and the daytime principal community contour (5 mV/m) of station WILD(AM).

As shown in **Exhibit 14 - Figure 2**, there is no principal community coverage contour overlap between WBOT(FM), WAKX(FM), and WWKX(FM). The WILD(AM) 5 mV/m principal community contour and WBOT(FM) 3.16 mV/m principal community contour do overlap each other, but neither station’s principal community contour is overlapped by the principal community contour a “third station” within the identified holdings. Section 73.3555(a)(2)) of the Commission’s Rules states that an “Overlap between two stations in different services is permissible if neither of

² Order in Implementation of Sections 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

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those two stations overlaps a third station in the same service". Thus, the radio duopoly provisions of Section 73.3555(a) are not triggered under the instant circumstances.

Contour Methodology

In preparing the attached maps, pertinent station data were extracted from the Commission's engineering databases. For the pertinent AM station, these included the operating power, radiation efficiency, directional antenna data (where appropriate), and geographic coordinates. The distances to the pertinent contours were computed using a digitized version of the Commission's estimated soil conductivity map, Figure M-3 and a computer program which simulates the Commission's AM groundwave propagation curves. For the FM stations and WNDS(TV), pertinent data for determining the distances to the contour included the antenna elevation above mean sea level, geographic coordinates, effective radiated power, and, where appropriate, directional antenna patterns.

The requisite contours distances were determined using digitized, 3 arc-second, terrain data along radials spaced every 5 degrees from the transmitter site and an implementation of the Commission's TVFMFS computer program which simulates the FM and TV propagation curves. The distances to the pertinent contours were then fed into a GIS mapping program which was used to generate the attached maps.

Conclusion

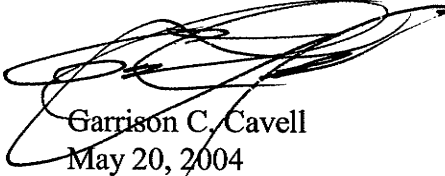
As demonstrated by the foregoing, *ShootingStar's* proposed acquisition of WNDS(TV), and *Alta's* attributable interest therein, would be permissible under §73.3555 of the Commission's rules because no prohibited principal community contour overlap or overlap of communities of license by pertinent facilities' contours would occur

Certification

The undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief. Mr. Cavell is a principal in the firm of *Cavell, Mertz & Davis, Inc.*, and has submitted numerous engineering

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exhibits to various local governmental authorities and the Federal Communications Commission.
His qualifications are a matter of record with that entity.


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May 20, 2004

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