

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
ON BEHALF OF HENGGOOCH LICENSE, LLC AND
MAX RADIO OF THE CAROLINAS LICENSES LLC
SELECTED NORTH CAROLINA COMMUNITIES**

JULY 2018

This engineering statement and supporting tabulations and figures have been prepared on behalf of **Hengooch License, LLC** (“HLLLC”) licensee of WVOD(FM), Manteo, North Carolina, WFMZ(FM), Hertford, NC and WZPR(FM), Nags Head, NC and **Max Radio Of The Carolinas Licenses, LLC** (“Max”) licensee of WCMS-FM Hatteras, NC and WCXL(FM), Kill Devil Hills, NC. The purpose of this statement is to demonstrate HLLLC & Max continuing compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of AM and FM broadcast facilities.

Continued common ownership of the following five FM stations in two separate North Carolina markets is proposed:

<u>Call Sign</u>	<u>Frequency</u>	<u>City of License</u>	<u>Facility ID</u>
WCXL	104.1	Kill Devil Hills	55248
WCMS-FM	94.5	Hatteras	83211
WVOD	99.1	Manteo	50525
WZPR	92.3	Nags Head	12158
WFMZ	104.9	Hertford	39883

These five stations are considered as two markets since the principal community contours do not have an area of common overlap for all stations proposed for common ownership. Markets where the stations have common overlap are broken out as follows:

Market 1: WCXL(FM) and WFMZ(FM) – see map Figure 1 & Table 1.

2: WCXL(FM), WZPR(FM), WCMS-FM and WVOD(FM) –
see map Figure 2 & Table 2.

A multiple ownership analysis was prepared considering the above described radio stations under proposed common ownership or control, which stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) in accordance with *Section 73.3555* of the FCC Rules.

RADIO MARKETS & METHODOLOGY

The radio market is defined as the area encompassed by the principal community contours (predicted 5 mV/m groundwave contour for AM; predicted 3.16 mV/m contour for FM) of the stations that are both mutually overlapping and proposed to be commonly attributable post - transaction. The number of radio stations in this defined radio market (i.e., the numerator) will not exceed the limits set forth in *Section 73.3555(a)*. A commonly attributable station whose contour overlaps the contour of some but not all of the contours of the stations that define the radio market was not counted toward the local radio ownership limits (i.e., is not counted in the numerator). None of the communities of license are located in a rated market. Since the stations are in an unrated market stations counted as part of the market are determined on the basis of contour overlap. Figures 1 & 2, attached, depict the principal community contours for all five stations for which common ownership is proposed. All proposed market AM 5 mV/m contours are shown in grey. Owned station FM 70 dBu contours are plotted in blue if the station is part of the market and green if not a part of the market map. Other FM station 70 dBu contours are plotted in red. Each market study was prepared using the July 2, 2018 CDBS.

Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's CDBS database using the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivities were obtained from FCC Figure M3.

Distances to the FM contours were determined based on the methodology of 47 CFR 73.313. Terrain data was derived from the Radiosoft Comstudy high accuracy 3 second terrain database for each of the FM stations, using radials spaced every 5 degrees of azimuth.

MARKET ANALYSIS

Market 1 consists of WCXL(FM) and WFMZ(FM). Section 73.3555(a)(1)(iii) states that a party may own up to four stations in the same service, not more than 6 stations total, in a market with between 15 and 29 stations. There are 26 FM and six AM station in the market. Three of the FM stations proposed for common ownership are not attributable to this market. The non-attributable are: WVOD(FM), WCMS-FM and WZPR(FM). It is believed clear that Market 1 is in compliance with Section 73.3555(a)(1)(iii).

Market 2 consists of WCXL(FM), WZPR(FM), WCMS-FM and WVOD(FM). Section 73.3555(a)(1)(ii) states that a party may own up to four stations in the same service, not more than 7 stations total, in a market with between 30 and 44 stations. There are 31 FM and six AM station in the market. Only one of the FM stations proposed for common ownership are not attributable to this market. The non-attributable station is WFMZ(FM). It is believed clear that Market 2 is in compliance with Section 73.3555(a)(1)(ii).

CONCLUSION

Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555(a)(1)(iii)* of the Commission's Rules with regard to Market # 1 and *Section 73.3555(a)(1)(ii)* of the Commission's Rules with regard to Market # 2.

The foregoing was prepared on behalf of **Hengooch License, LLC** and **Max Radio of the Carolinas Licenses LLC** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The undersigned certifies, under penalty of perjury, that the statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.



By_____

Clarence M. Beverage
for Communications Technologies, Inc.
Marlton, New Jersey

July 3, 2018

TABLE 1 PAGE 1
STATIONS IN THE HERTFORD MARKET ANALYSIS
JULY 2018

FM CALL FORMAT LATITUDE	ST ARN LONGITUDE	CITY HAAT:m	FREQ OWNER AMSL:m	CHN	CL	ERP	STAT
WCMS-FM BMLH-20040610AAV 35-29-10.0 N	NC MAX RADIO OF THE CAROLINAS LICENSES LLC 75-59-58.0 W	HATTERAS 298.452	94.50000 299.000	C1		100000.00	LIC
WCXL BLH-20040324AER 36-08-08.0 N	NC MAX RADIO OF THE CAROLINAS LICENSES LLC 75-49-28.0 W	KILL DEVIL HILLS 296.000	104.10000 296.000	C1		100000.00	LIC
WVOD BLH-19900110KA 35-50-44.0 N	NC HENGGOOCH LICENSE, LLC 75-38-50.0 W	MANTEO 149.931	99.10000 150.000	C2		50000.00	LIC
WFMZ BLH-19970819KD 36-05-59.0 N	NC HENGGOOCH LICENSE, LLC 76-28-31.0 W	HERTFORD 150.000	104.90000 150.000	C2		50000.00	LIC
WTGX BLED-20140829AAD 35-54-24.0 N	NC PATHWAY CHRISTIAN ACADEMY, INC. 77-00-32.0 W	WILLIAMSTON 89.167	90.50000 100.000	C3		20000.00	LIC
WERX-FM BMLH-20110503ABA 35-55-05.0 N	NC LAWRENCE LOESCH & MARGARET LOESCH 76-20-48.0 W	COLUMBIA 208.333	102.50000 210.000	C1		64000.00	LIC
WTIB BMLH-20101022AAA 35-53-54.0 N	NC INNER BANKS MEDIA, LLC 76-59-10.0 W	WILLIAMSTON 293.889	103.70000 305.000	C1		100000.00	LIC
WPNC-FM BLH-19810914AU 35-50-48.0 N	NC DURLYN BROADCASTING, CO. 76-45-22.0 W	PLYMOUTH 455.625	95.90000 470.000	A		2600.00	LIC
WRSF BLH-19840316AA 35-53-18.0 N	NC EAST CAROLINA RADIO, INC. 76-13-50.0 W	COLUMBIA 186.097	105.70000 187.000	C1		100000.00	LIC
WUND-FM BLED-20030812ABB 35-54-00.0 N	NC WUNC PUBLIC RADIO, LLC 76-20-45.0 W	MANTEO 416.639	88.90000 419.000	C0		50000.00	LIC
WBXB BLH-19901212KC 36-07-11.0 N	NC EDENTON CHRISTIAN RADIO, INC. 76-35-29.0 W	EDENTON 91.819	100.10000 93.000	C2		50000.00	LIC

TABLE 1 PAGE 2
STATIONS IN THE HERTFORD MARKET ANALYSIS
JULY 2018

WAFX	VA	SUFFOLK	106.90000	C	100000.00	LIC
BLH-20021227ABL TIDEWATER COMMUNICATIONS, LLC						
36-48-09.0	N	76-45-19.0	W 301.000	316.000		
WGTI	NC	WINFALL	97.70000	C2	31000.00	LIC
BLED-20120308ABW EDUCATIONAL MEDIA FOUNDATION						
36-18-40.0	N	76-17-34.0	W 157.000	157.000		
WVRL	NC	ELIZABETH CITY	88.30000	C2	50000.00	LIC
BLED-20030206ACQ LIBERTY UNIVERSITY, INC.						
36-18-40.0	N	76-17-34.0	W 136.000	136.000		
WRVS-FM	NC	ELIZABETH CITY	89.90000	C2	41000.00	LIC
BLED-19910110KD ELIZABETH CITY STATE UNIVERSITY						
36-16-55.0	N	76-12-44.0	W 73.000	73.000		
WNOB	VA	CHESAPEAKE	93.70000	C1	100000.00	LIC
BLH-20031015ADL COMMONWEALTH RADIO, L.L.C.						
36-32-55.0	N	76-11-16.0	W 296.861	297.000		
WHGO	NC	HERTFORD	91.30000	A	3100.00	LIC
BLED-20130812AAE PATHWAY CHRISTIAN ACADEMY, INC.						
36-05-59.0	N	76-28-31.0	W 109.000	109.000		
WHBT-FM	NC	MOYOCK	92.10000	C3	14500.00	LIC
BMLH-20050720AEW CC LICENSES, LLC, AS DEBTOR IN POSSESSION						
36-37-38.0	N	76-13-07.0	W 130.514	131.000		
WQDK	NC	GATESVILLE	99.30000	A	3700.00	LIC
BLH-20050414AAX ICON BROADCASTING, INC.						
36-16-29.0	N	76-43-17.0	W 129.028	135.000		
WOBX-FM	NC	MANTEO	98.10000	C2	50300.00	LIC
BLH-20141212ABM EAST CAROLINA RADIO, INC.						
35-51-54.0	N	75-39-00.0	W 137.131	137.200		
WOBX-FM	NC	WANCHESE	95.30000	C3	14500.00	LIC
BLH-20141212ABN EAST CAROLINA RADIO, INC.						
35-51-54.0	N	75-39-00.0	W 121.831	121.900		
WZPR	NC	NAGS HEAD	92.30000	C3	10000.00	LIC
BMLH-20100209ABC HENGGOCH LICENSE, LLC						
35-50-49.0	N	75-37-20.0	W 117.000	117.000		
WYND-FM	NC	HATTERAS	97.10000	C2	29000.00	LIC
BLED-20140507AAS EDUCATIONAL MEDIA FOUNDATION						
35-29-10.4	N	75-59-58.3	W 199.931	200.000		

**TABLE 1 PAGE 3
STATIONS IN THE HERTFORD MARKET ANALYSIS
JULY 2018**

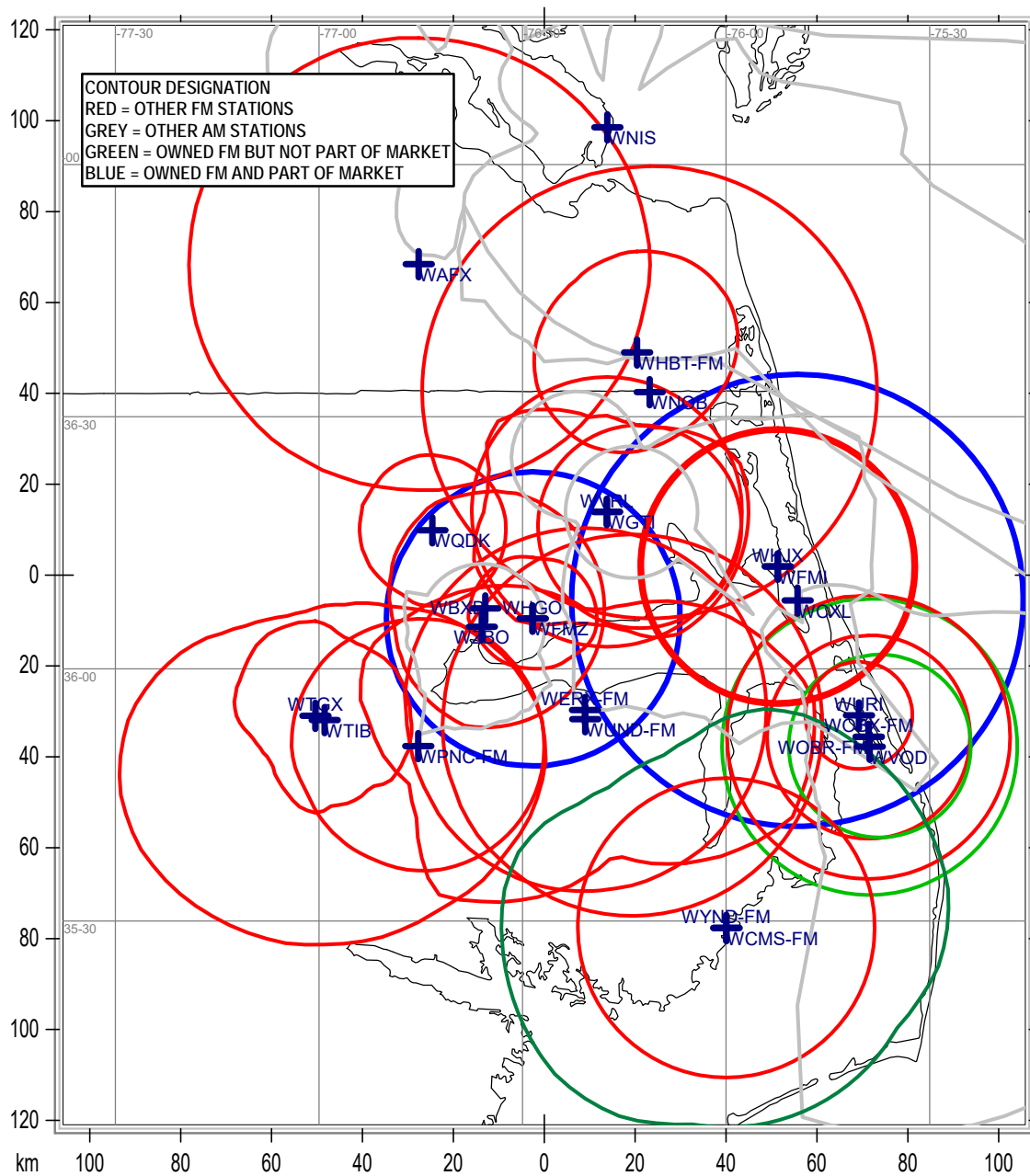
WURI	NC	MANTEO	90.90000	A	5200.00	LIC
BLD-20140228AAY WUNC PUBLIC RADIO, LLC						
35-54-28.0 N 75-40-26.0 W 56.792 57.000						
WFMI	NC	SOUTHERN SHORES	100.90000	C2	39000.00	LIC
BLH-20030102ABE COMMUNICATIONS SYSTEMS, INC.						
36-12-10.0 N 75-52-23.0 W 148.000 148.000						
WKJX	NC	ELIZABETH CITY	96.70000	C2	50000.00	LIC
BLH-20040618AAH EAST CAROLINA RADIO OF ELIZABETH CITY, INC.						
36-12-10.0 N 75-52-23.0 W 124.000 124.000						

**TABLE 1 PAGE 3
AM STATIONS IN THE HERTFORD MARKET ANALYSIS
JULY 2018**

CALL FORMAT LATITUDE	ST	CITY ARN LONGITUDE	FREQ OWNER	PAT	AG	PWR	DESC

WGAI	NC	ELIZABETH CITY	560.00000 LD			1.000	DA2
BL20040831ACS GREGORY COMMUNICATIONS LICENSE, INC.							
36-20-16.0 N 76-14-49.0 W							
WZBO	NC	EDENTON	1260.00000 LD			1.000	ND2
BL LAWRENCE LOESCH & MARGARET LOESCH							
36-05-00.0 N 76-36-00.0 W							
WCNC	NC	ELIZABETH CITY	1240.00000 LU			1.000	ND1
BL EAST CAROLINA RADIO OF ELIZABETH CIT							
36-18-38.0 N 76-13-56.0 W							
WTAR	VA	NORFOLK	850.00000 LD			50.000	DA2
BMML20100526AFH SINCLAIR TELECABLE, INC.							
37-03-36.0 N 76-41-26.0 W							
WNIS	VA	NORFOLK	790.00000 LU	AG		5.000	DA1
BL19971211KD COMMONWEALTH RADIO, L.L.C.							
37-04-25.0 N 76-17-31.0 W							
WOBX	NC	WANCHESE	1530.00000 LD			1.000	DAD
BL19811214AF EAST CAROLINA RADIO, INC.							
35-51-52.0 N 75-39-01.0 W							

HENGGOCH & MAX MARKET STUDY FOR WCMS-FM APPLICATION FOR CP



Communications Technologies, Inc. Marlton, New Jersey

State Borders Lat/Lon Grid

TABLE 2 PAGE 1
STATIONS IN THE HATTERAS MARKET ANALYSIS
JULY 2018

FM CALL FORMAT LATITUDE	ST ARN LONGITUDE	CITY HAAT:m	FREQ OWNER AMSL:m	CHN	CL	ERP	STAT
WCXL BLH-20040324AER 36-08-08.0 N	NC MAX RADIO OF THE CAROLINAS LICENSES LLC 75-49-28.0 W	KILL DEVIL HILLS 296.000	104.10000 296.000		C1	100000.00	LIC
WCMS-FM BMLH-20040610AAV 35-29-10.0 N	NC MAX RADIO OF THE CAROLINAS LICENSES LLC 75-59-58.0 W	HATTERAS 298.931	94.50000 299.000		C1	100000.00	LIC
WVOD BLH-19900110KA 35-50-44.0 N	NC HENGGOOCH LICENSE, LLC 75-38-50.0 W	MANTEO 149.931	99.10000 150.000		C2	50000.00	LIC
WFMZ BLH-19970819KD 36-05-59.0 N	NC HENGGOOCH LICENSE, LLC 76-28-31.0 W	HERTFORD 150.000	104.90000 150.000		C2	50000.00	LIC
WTKF BLH-20080129ABO 34-53-01.0 N	NC ATLANTIC RIDGE TELECASTERS, INC. 76-30-22.3 W	ATLANTIC 191.700	107.10000 191.700		C1	46000.00	LIC
WERX-FM BMLH-20110503ABA 35-55-05.0 N	NC LAWRENCE LOESCH & MARGARET LOESCH 76-20-48.0 W	COLUMBIA 208.333	102.50000 210.000		C1	64000.00	LIC
WMGV BLH-19960508KC 35-07-55.0 N	NC CMG COASTAL CAROLINA, LLC 76-52-32.0 W	NEWPORT 285.694	103.30000 300.000		C1	100000.00	LIC
WSTK BLH-20041203AFD 35-18-09.0 N	NC MEDIA EAST, LLC 76-34-00.0 W	AURORA 119.583	104.50000 120.000		A	4200.00	LIC
WHYC BLED-19980527KD 35-26-27.0 N	NC HYDE COUNTY BOARD OF EDUCATION 76-13-19.0 W	SWAN QUARTER 80.000	88.50000 80.000		A	2800.00	LIC
WQZL BLH-20110825AAP 35-28-30.0 N	NC DICK BROADCASTING COMPANY, INC. OF TENNESSEE 76-51-51.0 W	BELHAVEN 134.125	101.10000 146.000		C2	50000.00	LIC
WZGO BLED-20060727AAI 35-18-09.0 N	NC PATHWAY CHRISTIAN ACADEMY, INC. 76-34-00.0 W	AURORA 107.183	91.10000 107.600		C2	40000.00	LIC
WRSF BLH-19840316AA 35-53-18.0 N	NC EAST CAROLINA RADIO, INC. 76-13-50.0 W	COLUMBIA 186.097	105.70000 187.000		C1	100000.00	LIC

TABLE 2 PAGE 2
STATIONS IN THE HATTERAS MARKET ANALYSIS
JULY 2018

WUND-FM	NC	MANTEO	88.90000	C0	50000.00	LIC
BLED-20030812ABB WUNC PUBLIC RADIO, LLC						
35-54-00.0 N 76-20-45.0 W 416.639 419.000						
WBXB	NC	EDENTON	100.10000	C2	50000.00	LIC
BLH-19901212KC EDENTON CHRISTIAN RADIO, INC.						
36-07-11.0 N 76-35-29.0 W 91.819 93.000						
WGTI	NC	WINFALL	97.70000	C2	31000.00	LIC
BLED-20120308ABW EDUCATIONAL MEDIA FOUNDATION						
36-18-40.0 N 76-17-34.0 W 157.000 157.000						
WVRL	NC	ELIZABETH CITY	88.30000	C2	50000.00	LIC
BLED-20030206ACQ LIBERTY UNIVERSITY, INC.						
36-18-40.0 N 76-17-34.0 W 136.000 136.000						
WRVS-FM	NC	ELIZABETH CITY	89.90000	C2	41000.00	LIC
BLED-19910110KD ELIZABETH CITY STATE UNIVERSITY						
36-16-55.0 N 76-12-44.0 W 73.000 73.000						
WNOB	VA	CHESAPEAKE	93.70000	C1	100000.00	LIC
BLH-20031015ADL COMMONWEALTH RADIO, L.L.C.						
36-32-55.0 N 76-11-16.0 W 296.861 297.000						
WHGO	NC	HERTFORD	91.30000	A	3100.00	LIC
BLED-20130812AAE PATHWAY CHRISTIAN ACADEMY, INC.						
36-05-59.0 N 76-28-31.0 W 109.000 109.000						
WHBT-FM	NC	MOYOCK	92.10000	C3	14500.00	LIC
BMLH-20050720AEW CC LICENSES, LLC, AS DEBTOR IN POSSESSION						
36-37-38.0 N 76-13-07.0 W 130.514 131.000						
WOBX-FM	NC	MANTEO	98.10000	C2	50300.00	LIC
BLH-20141212ABM EAST CAROLINA RADIO, INC.						
35-51-54.0 N 75-39-00.0 W 137.131 137.200						
WOBX-FM	NC	WANCHESE	95.30000	C3	14500.00	LIC
BLH-20141212ABN EAST CAROLINA RADIO, INC.						
35-51-54.0 N 75-39-00.0 W 121.831 121.900						
WBUX	NC	BUXTON	90.50000	A	5900.00	LIC
BLED-20000203ABD WUNC PUBLIC RADIO, LLC						
35-16-01.0 N 75-32-38.0 W 46.931 47.000						
WOVV	NC	OCRACOKE	90.10000	A	650.00	LIC
BLED-20101025AAS OCRACOKE COMMUNITY RADIO, INC.						
35-06-43.0 N 75-58-38.2 W 19.000 19.000						
WZPR	NC	NAGS HEAD	92.30000	C3	10000.00	LIC
BMLH-20100209ABC HENGGOCH LICENSE, LLC						
35-50-49.0 N 75-37-20.0 W 117.000 117.000						

TABLE 2 PAGE 3
STATIONS IN THE HATTERAS MARKET ANALYSIS
JULY 2018

WHDZ	NC	BUXTON	101.50000	A	130.00	LIC
BLED-20140311ADT RADIO HATTERAS, INC.						
35-16-02.0 N 75-32-07.0 W 54.931 55.000						
WYND-FM	NC	HATTERAS	97.10000	C2	29000.00	LIC
BLED-20140507AAS EDUCATIONAL MEDIA FOUNDATION						
35-29-10.4 N 75-59-58.3 W 199.931 200.000						
WHDX	NC	WAVES	99.90000	A	150.00	LIC
BLED-20160805ABN RADIO HATTERAS, INC.						
35-34-15.0 N 75-28-08.0 W 26.000 26.000						
WURI	NC	MANTEO	90.90000	A	5200.00	LIC
BLED-20140228AAY WUNC PUBLIC RADIO, LLC						
35-54-28.0 N 75-40-26.0 W 56.792 57.000						
WFMI	NC	SOUTHERN SHORES	100.90000	C2	39000.00	LIC
BLH-20030102ABE COMMUNICATIONS SYSTEMS, INC.						
36-12-10.0 N 75-52-23.0 W 148.000 148.000						
WKJX	NC	ELIZABETH CITY	96.70000	C2	50000.00	LIC
BLH-20040618AAH EAST CAROLINA RADIO OF ELIZABETH CITY, INC.						
36-12-10.0 N 75-52-23.0 W 124.000 124.000						

TABLE 2 PAGE 4
STATIONS IN THE HATTERAS MARKET ANALYSIS
JULY 2018

AM STATIONS

CALL FORMAT LATITUDE	ST	CITY ARN LONGITUDE	FREQ OWNER	PAT	AG	PWR	DESC
WDLX BL19990401DD 35-31-36.0 N	NC	WASHINGTON PIRATE MEDIA GROUP, LLC 77-04-31.0 W	930.00000	LD		5.000	DAN
WGAI BL20040831ACS 36-20-16.0 N	NC	ELIZABETH CITY GREGORY COMMUNICATIONS LICENSE, INC. 76-14-49.0 W	560.00000	LD		1.000	DA2
WCNC BL 36-18-38.0 N	NC	ELIZABETH CITY EAST CAROLINA RADIO OF ELIZABETH CIT 76-13-56.0 W	1240.00000	LU		1.000	ND1
WOBX BL19811214AF 35-51-52.0 N	NC	WANCHESE EAST CAROLINA RADIO, INC. 75-39-01.0 W	1530.00000	LD		1.000	DAD
WTAR BMML20100526AFH 37-03-36.0 N	VA	NORFOLK SINCLAIR TELECABLE, INC. 76-41-26.0 W	850.00000	LD		50.000	DA2
WNIS BL19971211KD 37-04-25.0 N	VA	NORFOLK COMMONWEALTH RADIO, L.L.C. 76-17-31.0 W	790.00000	LU	AG	5.000	DA1

[illegible]

 County Borders Lat/Lon Grid