

## Multiple Ownership Response

W. Grant Hafley ("Mr. Hafley") owns all of the issued and outstanding capital stock of AVC Communications, Inc. ("AVC"), which is the licensee of radio stations WILE-AM, Cambridge, Ohio ("WILE-AM"), WCMJ-FM, Cambridge, Ohio ("WCMJ-FM") and WILE-FM, Byesville, Ohio ("WILE-FM"). Stations WILE-AM, WCMJ-FM and WILE-FM are referred to collectively as the "AVC Stations". Mr. Hafley individually is also the licensee of radio stations WWKC-FM, Caldwell, Ohio and WBNV-FM, Barnesville, Ohio (collectively with WWKC-FM, the "Hafley Stations").

The instant transaction for which prior FCC approval is required involves the transfer of control of AVC from Mr. Hafley to Joel Losego ("Mr. Losego"), an individual residing in Ohio. Among other duties, Mr. Losego serves as the General Manager of the AVC Stations and the Hafley Stations.

The AVC Stations and the Hafley Stations are currently owned and controlled by Mr. Hafley. As reflected herein and in the attached Multiple Ownership Compliance Study prepared by Bromo Communications, Inc. (the "Bromo Study"), the proposed transfer of control of the AVC Stations and the subsequent provision of sales and marketing services to the Hafley Stations by Mr. Losego will comply with the provisions of Section 73.3555 of the Commission's Rules. In addition to the AVC Stations and the Hafley Stations, the multiple ownership analysis also includes Station WBIK-FM, Pleasant City, Ohio ("WBIK-FM"), for which advertising sales and services will also be provided by Mr. Losego pursuant to a Joint Sales Agreement. A copy of the form of the Joint Sales Agreement which will be executed at the closing is filed with the assignment application. Therefore, WBIK-FM is also considered to be an attributable interest insofar as Mr. Losego is concerned.<sup>1</sup>

As reflected in the Bromo Study, the AVC Stations and the Hafley Stations together form two radio markets, with each market containing 14 or fewer full-power commercial and/or noncommercial radio stations. In radio markets of this size, an individual can hold attributable interests in not more than 5 commercial

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<sup>1</sup> Mr. Hafley is also the licensee of radio station WBNV-FM, Barnesville, Ohio, which is located within the Wheeling, WV Arbitron Metro Market (Market No. 179). Mr. Losego will also be responsible for the sale of time on WBNV pursuant to a Joint Sales Agreement ("JSA"). WBNV is not a relevant concern for purposes of the Market #1 and Market #2 analysis that follows. There is no principal community contour overlap between WBNV and any of the AVC Stations or the Hafley Stations in Markets #1 and #2.

radio stations and not more than 3 commercial stations in the same service (i.e., AM or FM). The relevant markets are identified as Market #1 and Market #2 in the Bromo Study. *See*, Bromo Study, Exhibits #1 and #2.

As reflected in the Bromo Study and herein, Mr. Losego will not hold attributable radio station interests in excess of the 5 full power stations in total or more than 3 commercial stations in the same service (AM or FM) in Markets #1 or #2. Therefore, the proposed transaction is in compliance with Rule 73.3555(a)(1)(iv).