

RESPONSE TO SECTION II, ITEM 4(b)

The instant application requests approval of a minor change in the facilities for WKHI(FM), Fruitland, Maryland (the “Station”), licensed to Great Scott Broadcasting (“Great Scott”), to upgrade the WKHI technical facilities. For purposes of the FCC’s local radio ownership rule, the Station is deemed to be a part of the Salisbury-Ocean City, Maryland radio market.

The attached exhibit, FCC Geographic Market Definition for Salisbury-Ocean City, Maryland was compiled on February 11, 2011 using BIA Research, Inc.’s *Media Access Pro* database. The exhibit lists all radio stations, including the Station, that are licensed to communities within the counties comprising the Salisbury-Ocean City Arbitron Metro or that Arbitron designates as “home” to the Salisbury-Ocean City Metro. As demonstrated in the exhibit, there are 41 stations in the Salisbury-Ocean City market. Under the local radio ownership rule, a person or single entity (or entities under common control) in a radio market with between 30 and 44 (inclusive) full-power, commercial and noncommercial radio stations may have a cognizable interest in not more than 7 commercial radio stations in total, and not more than 4 commercial stations in the same service (AM or FM).

As shown in the attached exhibit, Great Scott controls 10 stations in the Salisbury-Ocean City market (2 AM and 8 FM), including the Station, which exceeds the limits prescribed by the rule.¹ However, the Commission decided to “grandfather” existing combinations of radio

¹ This total includes a station that is currently authorized by the FCC to be silent. The silent station is not included in the 41 station market count above.

stations in 2002 *Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, 18 FCC Rcd 13620, 13712-13 (2003) (“*Ownership R&O*”). Under the *Ownership R&O*, entities are not required to divest their current interests in stations in order to come into compliance with the new ownership rule. *Ownership R&O*, 18 FCC Red at 13808. Note 4 to 47 C.F.R. § 73.3555 (2003) provides that the local radio ownership rule will not be applied so as to require divestiture by any licensee of existing facilities, and will apply to an application for minor changes to existing stations only if a grant of such application would create new or increased concentration of ownership among commonly owned, operated or controlled media properties. Because this application does not create any new or increased concentration of ownership among commonly owned, operated or controlled media properties, Great Scott’s control of such stations in the Salisbury-Ocean City market remains “grandfathered” and the local radio ownership rule does not apply to this application. *See* BPH-20050503ABV, granted Aug. 3, 2005 (minor change/class upgrade granted; grandfathered status preserved).



FCC Geographic Market Definition for Salisbury-Ocean City, MD

Call Letters	AM/ FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WMHZ	AM	1590	C	80s Hits	Salisbury-Ocean City, MD	07/02/2003	141	Epcot Broadcasting LLC	Ocean City, MD	Worcester
WOCM	FM	98.1	C	AAA	Salisbury-Ocean City, MD	07/02/2003	141	Irie Radio Inc	Selbyville, DE	Sussex
WJWK	AM	1280	C	AC	Salisbury-Ocean City, MD	07/02/2003	141	Great Scott Broadcasting Inc	Seaford, DE	Sussex
WQHQ	FM	104.7	C	AC	Salisbury-Ocean City, MD	07/02/2003	141	Clear Channel Communications Inc	Ocean City-Salisbury, MD	Worcester
WZEB	FM	101.7	C	AC	Salisbury-Ocean City, MD	07/02/2003	141	Great Scott Broadcasting Inc	Ocean View, DE	Sussex
WQMR	FM	101.1	C	Adult Hits	Salisbury-Ocean City, MD	07/02/2003	141	Maryland Star Broadcasting LLC	Snow Hill, MD	Worcester
WDKZ	FM	105.5	C	CHR	Salisbury-Ocean City, MD	07/02/2003	141	p Educational Media Foundation	Salisbury, MD	Wicomico
WOLC	FM	102.5	C	Christian	Salisbury-Ocean City, MD	07/02/2003	141	Maranatha Inc	Princess Anne, MD	Somerset
WSCL	FM	89.5	NC	Classical	Salisbury-Ocean City, MD	07/02/2003	141	Salisbury State University Foundation	Salisbury, MD	Wicomico
WGBG	FM	98.5	C	Clsc Hits	Salisbury-Ocean City, MD	07/02/2003	141	Great Scott Broadcasting Inc	Seaford, DE	Sussex
WJKI	FM	103.5	C	Clsc Hits	Salisbury-Ocean City, MD	07/02/2003	141	Great Scott Broadcasting Inc	Bethany Beach, DE	Sussex
WAAI	FM	100.9	C	Country	Salisbury-Ocean City, MD	07/02/2003	141	MTS Broadcasting	Hurlock, MD	Dorchester
WBEY	FM	97.9	C	Country	Salisbury-Ocean City, MD	07/02/2003	141	Bay Broadcasting Inc	Crisfield, MD	Somerset
WINX	FM	94.3	C	Country	Salisbury-Ocean City, MD	02/01/2005	141	First Media	St Michaels, MD	Talbot
WKHI	FM	107.7	C	Country	Salisbury-Ocean City, MD	07/02/2003	141	Great Scott Broadcasting Inc	Fruitland, MD	Wicomico
WKTT	FM	97.5	C	Country	Salisbury-Ocean City, MD	07/02/2003	141	Delmarva Broadcasting Company	Salisbury, MD	Wicomico
WWFG	FM	99.9	C	Country	Salisbury-Ocean City, MD	07/02/2003	141	Clear Channel Communications Inc	Ocean City, MD	Worcester
WZKT	FM	105.9	C	Country	Salisbury-Ocean City, MD	07/02/2003	141	Delmarva Broadcasting Company	Lewes, DE	Sussex
WXSH	FM	106.1	C	DARK	Salisbury-Ocean City, MD	07/02/2003	141	Great Scott Broadcasting Inc	Pocomoke City, MD	Worcester
WDIH	FM	90.3	NC	Gospel	Salisbury-Ocean City, MD	07/02/2003	141	Salisbury Educational Broadcasting Foundation	Salisbury, MD	Wicomico
WAFL	FM	97.7	C	Hot AC	Salisbury-Ocean City, MD	07/02/2003	141	Delmarva Broadcasting Company	Milford, DE	Sussex
WOCQ	FM	103.9	C	HpHop/Rhy	Salisbury-Ocean City, MD	07/02/2003	141	Great Scott Broadcasting Inc	Berlin, MD	Worcester
WQJZ	FM	97.1	C	Jazz	Salisbury-Ocean City, MD	07/02/2003	141	Delmarva Broadcasting Company	Ocean Pines, MD	Worcester
WICO	FM	92.5	C	News/Talk	Salisbury-Ocean City, MD	07/02/2003	141	Delmarva Broadcasting Company	Pocomoke City, MD	Worcester
WJDY	AM	1470	C	News/Talk	Salisbury-Ocean City, MD	07/02/2003	141	Clear Channel Communications Inc	Salisbury, MD	Wicomico
WSDL	FM	90.7	NC	News/Talk	Salisbury-Ocean City, MD	07/02/2003	141	Salisbury State University Foundation	Ocean City, MD	Worcester
WGOP	AM	540	C	Nostalgia	Salisbury-Ocean City, MD	02/06/2004	141	Birach Broadcasting Corporation	Pocomoke City, MD	Worcester
WYPO	FM	106.9	NC	NPR	Salisbury-Ocean City, MD	07/02/2003	141	Your Public Radio Corporation	Ocean City, MD	Worcester
WGMD	FM	92.7	C	Nws/Tlk/Inf	Salisbury-Ocean City, MD	07/02/2003	141	Resort Broadcasting Co	Rehoboth Beach, DE	Sussex
WRAU	FM	88.3	NC	Nws/Tlk/Inf	Salisbury-Ocean City, MD	07/06/2010	141	American University	Ocean City, MD	Worcester
WLBW	FM	92.1	C	Oldies	Salisbury-Ocean City, MD	07/02/2003	141	p Educational Media Foundation	Fenwick Island, DE	Sussex
WNCL	FM	101.3	C	Oldies	Salisbury-Ocean City, MD	07/02/2003	141	Delmarva Broadcasting Company	Milford, DE	Sussex
WTDK	FM	107.1	C	Oldies	Salisbury-Ocean City, MD	07/02/2003	141	MTS Broadcasting	Federalsburg, MD	Caroline
WKDB	FM	95.3	C	Rhymc/Olde	Salisbury-Ocean City, MD	07/02/2003	141	Great Scott Broadcasting Inc	Laurel, DE	Sussex

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



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Call Letters	AM/ FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WZBH	FM	93.5	C	Rock	Salisbury-Ocean City, MD	07/02/2003	141	Great Scott Broadcasting Inc	Georgetown, DE	Sussex
WJWL	AM	900	C	Span/Top40	Salisbury-Ocean City, MD	07/02/2003	141	Great Scott Broadcasting Inc	Georgetown, DE	Sussex
WYUS	AM	930	C	Span/Varty	Salisbury-Ocean City, MD	07/02/2003	141	Delmarva Broadcasting Company	Milford, DE	Sussex
WOSC	FM	95.9	C	Sports	Salisbury-Ocean City, MD	07/02/2003	141	Clear Channel Communications Inc	Bethany Beach, DE	Sussex
WTGM	AM	960	C	Sprts/Talk	Salisbury-Ocean City, MD	07/02/2003	141	Clear Channel Communications Inc	Salisbury, MD	Wicomico
WICO	AM	1320	C	Talk/News	Salisbury-Ocean City, MD	07/02/2003	141	Delmarva Broadcasting Company	Salisbury, MD	Wicomico
WSBY	FM	98.9	C	Urban AC	Salisbury-Ocean City, MD	07/02/2003	141	Clear Channel Communications Inc	Salisbury, MD	Wicomico
WESM	FM	91.3	NC	Varty/Jazz	Salisbury-Ocean City, MD	07/02/2003	141	University of Maryland	Princess Anne, MD	Somerset

Number of Stations in Geographic Market 42

Previous Stations in Geographic Market