

**RADIO MARKET ANALYSIS**  
**BROOKHAVEN BROADCASTING, INC.**  
**WBKN RADIO STATION**  
**BROOKHAVEN, MISSISSIPPI**  
**WMJU RADIO STATION**  
**BUDE, MISSISSIPPI**  
**February 2006**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Brookhaven Broadcasting, Inc. ("BBI"), the proposed assignee of stations WBKN, Channel 221A, Brookhaven, Mississippi<sup>1</sup> and WMJU, Channel 282C3, Bude, Mississippi. Principals of BBI also have interests in stations WAZA, Channel 229C3, Liberty, Mississippi and WAKK, 980 kHz, and WAKH, Channel 289C1, McComb, Mississippi.<sup>2</sup> WBKN, WMJU, WAZA, WAKK and WAKH are all licensed to communities located outside of any Arbitron Market and they are not "home" to any Arbitron Market. As such, a revised contour overlap ownership analysis is necessary. Exhibit #1 is a map depicting the city grade contours of the subject stations.

2. A study has, therefore, been conducted to verify that the ownership of these stations is in compliance with the Commission's multiple ownership rules. As a result of the overlap of contours, two distinct markets are created. Market #1 consists of FM stations WMJU, WAZA and WAKH and AM station WAKK. Market #2 consists of FM stations WBKN (license and

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1) In addition to the licensed facility, there is an outstanding permit to relocate WBKH (BPH-20040209AAH), which is also considered in this instant review.

2) Principals also own other facilities in the immediate area; WAPF, 1140 kHz, McComb, Mississippi; WAKK-FM, Channel 285A, Centreville, Mississippi; and WFCG, Channel 297A, Tylertown, Mississippi. There is also an outstanding permit for WFCG {BPH-20051014ACZ}, but its city grade contour falls in the same location at the licensed contour. Neither WBKN nor WMJU have overlap with these stations. As such, WAPF, WAKK-FM and WFCG are not further considered for this instant analysis. Other stations owned by principals are even farther from this subject radio market.

CP), WMJU, WAKH and AM station WAKK. Since the city grade contour of WAKH is in both of the markets, its contour will be used to determine the number of other contributing stations in the market, to which will be added the relevant subject stations. Therefore, the WAKH contour will be considered the Radio Market Boundary. No stations with transmitters located more than 92.0 kilometers from the boundary of the common overlap of subject stations will be considered. Nor will any BBI station be considered as a contributing station, unless it is a subject station in the market under review.

3. Exhibit #2 is a depiction of the AM and FM stations (commercial and non-commercial) providing service to the WAKH Radio Market. A total of six other stations have transmitters sites inside the WAKH contour. Exhibit #3 is a tabulation of the stations in Radio Market #1, a total of ten including the four 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.<sup>3</sup> At this level, common ownership or control of up to five stations, with no more than three in the same service, is permissible provided the number of stations to be commonly held does not exceed 50% of the stations in the market. Based on this number of facilities, it has been herein demonstrated that Radio Market #1 is in compliance. \*

4. Exhibit #4 is a tabulation of the stations in Radio Market #2, a total of ten including the four subject stations. The number of stations depicted falls in the fourteen or fewer stations

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3) There are other stations providing service to the market, however, the ones indicated were sufficient to demonstrate compliance based on the number of stations to be commonly held.

tier of §73.3555(a)(1)(iv) of the Commission's rules.<sup>4</sup> At this level, common ownership or control of up to five stations, with no more than three in the same service, is permissible provided the number of stations to be commonly held does not exceed 50% of the stations in the market. Based on this number of facilities, it has been herein demonstrated that Radio Market #2 is in compliance. Based on the above, it has been shown that the assignment of WBKN and WMJU to BBI is in compliance with the Commission's rules.

5. The foregoing technical statement was prepared on behalf of Brookhaven Broadcasting, Inc., 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) There are other stations providing service to the market, however, the ones indicated were sufficient to demonstrate compliance based on the number of stations to be commonly held.



# Graham Brock, Inc. - Broadcast Technical Consultants

## WBKN

BLH-19940808KB  
Latitude: 31-36-00 N  
Longitude: 090-27-09 W  
ERP: 5.20 kW  
Channel: 221A  
Frequency: 92.1 MHz

## WBKN CP

BPH-20040209AAH  
Latitude: 31-33-48 N  
Longitude: 090-26-27 W  
ERP: 3.40 kW  
Channel: 221A  
Frequency: 92.1 MHz

## WMJU

BLH-19940808KB  
Latitude: 31-33-33 N  
Longitude: 090-40-26 W  
ERP: 25.00 kW  
Channel: 282A  
Frequency: 104.3 MHz

## WAKH

BLH-19821026AS  
Latitude: 31-16-50 N  
Longitude: 090-27-05 W  
ERP: 100.00 kW  
Channel: 289C1  
Frequency: 105.7 MHz

## WAZA

BLH-19980702KE  
Latitude: 31-17-12 N  
Longitude: 090-47-53 W  
ERP: 25.00 kW  
Channel: 299C3  
Frequency: 107.7 MHz

## WAKK

Latitude: 31-12-51 N  
Longitude: 090-27-42 W  
980 kHz - 5.0 kW

## WFCG

BLH-20050823ACA  
Latitude: 31-04-39 N  
Longitude: 090-04-46 W  
ERP: 3.20 kW  
Channel: 297A  
Frequency: 107.3 MHz

## WFCG.C

BPH-20051014ACZ  
Latitude: 31-04-39 N  
Longitude: 090-04-46 W  
ERP: 2.20 kW  
Channel: 297A  
Frequency: 107.3 MHz

## WAPF AM

Latitude: 31-14-51 N  
Longitude: 090-25-14 W  
1140 kHz - 1.0 kW

WBKN LIC. 3.16 mV/m

WBKN CP 3.16 mV/m

WMJU 3.16 mV/m

WAKK 5.0 mV/m

WAPF 5.0 mV/m

WFCG LIC/CP 3.16 mV/m

WAKK-FM 3.16 mV/m

WAKH 3.16 mV/m

**EXHIBIT #1**  
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**February 2006**

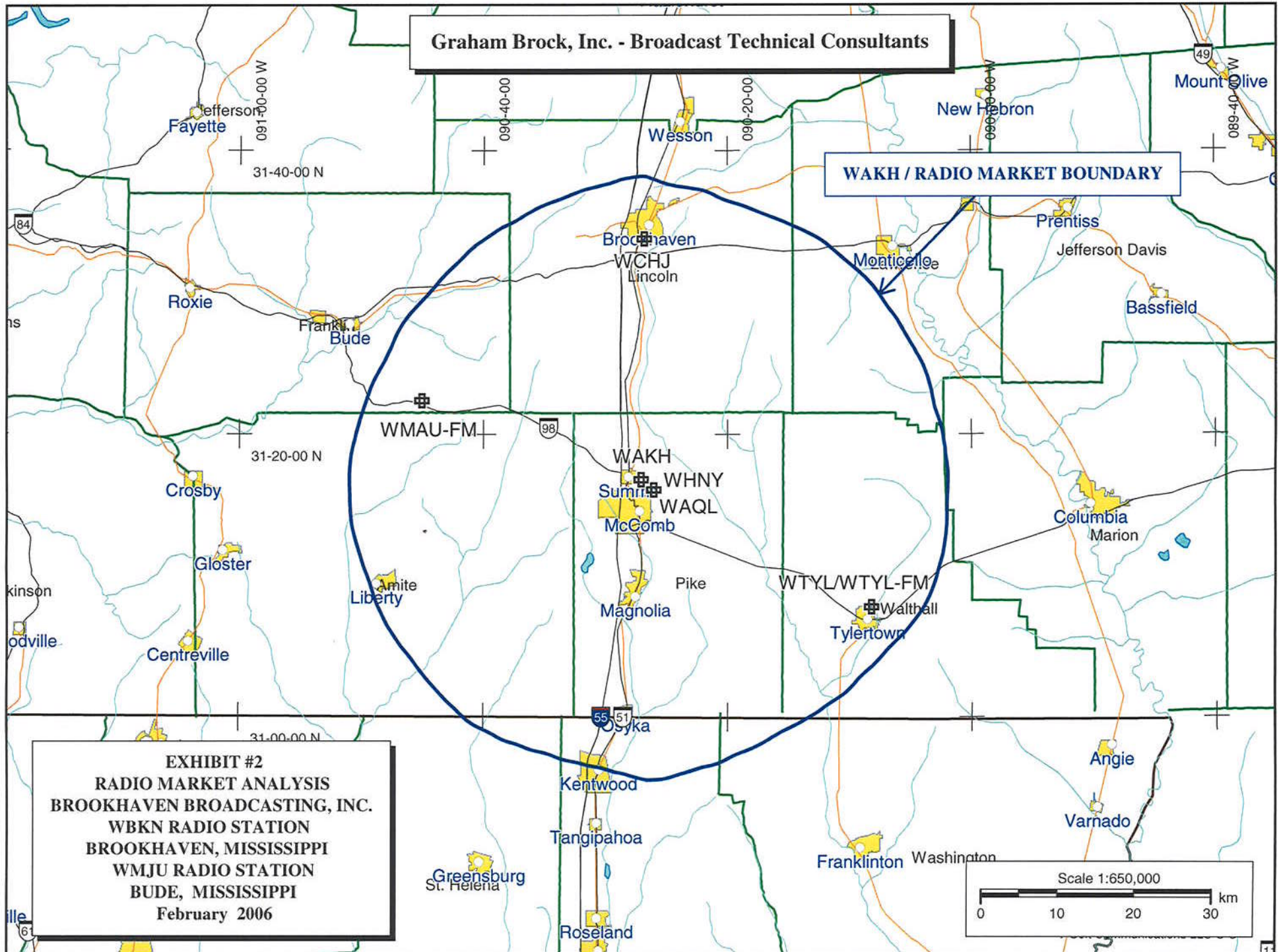
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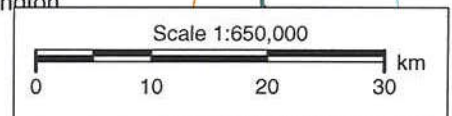


**Graham Brock, Inc. - Broadcast Technical Consultants**

**WAKH / RADIO MARKET BOUNDARY**



**EXHIBIT #2**  
**RADIO MARKET ANALYSIS**  
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**EXHIBIT #3**

**Tabulation of Stations in Radio Market #1**

**AM Stations**

* WAKK	980 kHz	McComb, Mississippi
WHNY	1250 kHz	McComb, Mississippi
WTYL	1290 kHz	Tylertown, Mississippi
WCHJ	1470 kHz	Brookhaven, Mississippi

Total AM Stations - 4

**FM Stations**

WMAU-FM	Ch 205C1	Bude, Mississippi
WAQL	Ch 213A	McComb, Mississippi
WTYL-FM	Ch 249A	Tylertown, Mississippi
* WMJU	Ch 282C3	Bude, Mississippi
* WAKH	Ch 289C1	McComb, Mississippi
* WAZA	Ch 299C3	Liberty, Mississippi

Total FM Stations - 6

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 10**

\* Subject station.

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**EXHIBIT #4**

**Tabulation of Stations in Radio Market #2**

**AM Stations**

* WAKK	980 kHz	McComb, Mississippi
WHNY	1250 kHz	McComb, Mississippi
WTYL	1290 kHz	Tylertown, Mississippi
WCHJ	1470 kHz	Brookhaven, Mississippi

Total AM Stations - 4

**FM Stations**

WMAU-FM	Ch 205C1	Bude, Mississippi
WAQL	Ch 213A	McComb, Mississippi
* WBKN	Ch 221A	Brookhaven, Mississippi
WTYL-FM	Ch 249A	Tylertown, Mississippi
* WMJU	Ch 282C3	Bude, Mississippi
* WAKH	Ch 289C1	McComb, Mississippi

Total FM Stations - 6

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 10**

\* Subject station.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

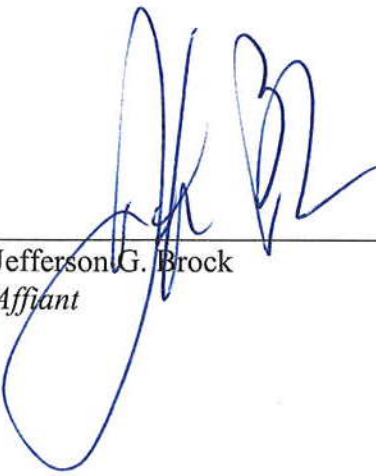
State of Georgia    )  
St. Simons Island    ) ss:  
County of Glynn    )

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Brookhaven Broadcasting, Inc., to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 20th day of February 2006.*

  
\_\_\_\_\_  
Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me  
this the 20th day of February 2006*

  
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Notary Public, State of Georgia  
My Commission Expires: September 3, 2007