

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
ON BEHALF OF PROPOSED TRANSFEREES
JOHN R. RAESE AND DAVID A. RAESE
KEYSER, WEST VIRGINIA**

JUNE 2006

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JUNE 6, 2006

This engineering statement and supporting tabulations and figures have been prepared on behalf of proposed transferees **John R. and David A. Raese ("Raese")**. The purpose of this statement is to demonstrate **Raese** compliance with *Section 73.3555* of the Commission's Rules with respect to multiple ownership of AM and FM broadcast facilities.

Raese proposes common ownership in the following three stations in the Keyser, West Virginia market:

WKLP-AM	Keyser, WV	1390 kHz	1 kW LD-U	Facility ID 62340
WQZK-FM	Keyser, WV	94.1 MHz	21 kW	BLH 20030320AAN
WDYK (FM)	Ridgeley, WV	100.5 MHz	4.6 kW	BMPH 20060421ABL

These three stations are considered as two markets since the principal community contour for WDYK has no common overlap with AM station WKLP, (only with WQZK-FM), and WQZK-FM and WDYK alone have common overlap.

Market 1: WKLP (AM) and WQZK-FM.

2: WDYK (FM) and WQZK-FM.

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 or measured 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). Keyser and Ridgley are located in Mineral County, West Virginia. Neither of the communities of license are located in an Arbitron defined metro county. Since the stations are in counties which are not Arbitron Metro counties, stations counted as part of the market are determined on the basis of contour overlap. *Figure 1* depicts the principal community contours for all three stations for which common ownership is proposed.

Table I lists all AM stations whose 5 mV/m daytime contour duplicates some portion of the market. The contours for these stations are plotted on *Figure 2* in blue along with the Keyser market as depicted on *Figure 1*.

Table I also lists all FM stations whose 70 dBu contour duplicates some portion of the market. The contours for these stations are plotted on *Figure 3* in salmon along with the Keyser market.

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 N.G.D.C. 30-second computer database for each of the FM stations, using radials spaced every 5 degrees of azimuth.

CONCLUSION

Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555(a)(1)(iv)* of the Commission's Rules. There are 19 FM and 7 AM stations considered in this study which have principal community contours that overlap some portion of the attributable stations principal community contours. Stations in each market are:

Market 1: Attributable Stations - 2 Stations (1 AM & 1 FM)
WKLP (AM) and WQZK-FM.

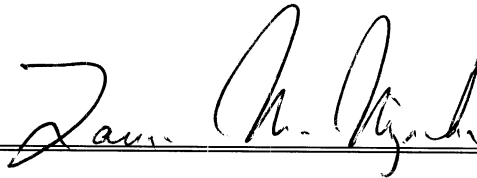
Non Attributable Stations in Market = 24

Market 2: Attributable Stations - 2 Stations (2 FM)
WDYK (FM) and WQZK-FM.

Non Attributable Stations in Market = 24

The foregoing was prepared on behalf of **John R. and David A. Raese** by Laura M. Mizrahi 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 her own knowledge, except such statements made on information and belief, and as to these statements she believes them to be true and correct.

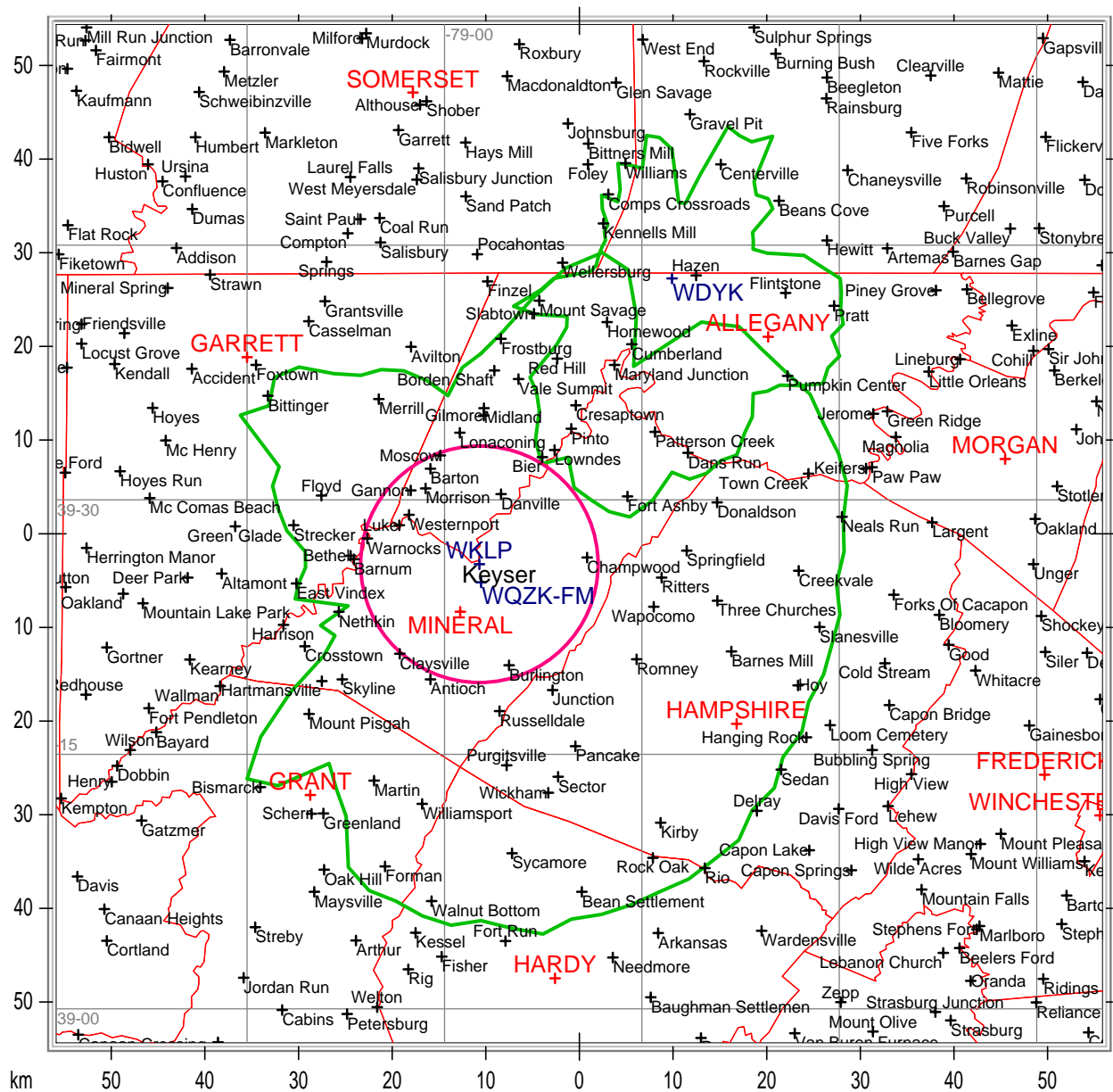
By

A handwritten signature in black ink, appearing to read "Laura M. Mizrahi", is written over a double horizontal line.

Laura M. Mizrahi
for Communications Technologies, Inc.
Marlton, New Jersey

June 13, 2006

Proposed Raese owned stations, Keyser, WV Green = FM, Pink = AM



Communications Technologies, Inc.

County Borders Lat/Lon Grid

Map Scale: 1:720000 1 cm = 7.20 km V/H Size: 108.71 x 111.75 km

Figure 1

 County Borders Lat/Lon Grid

 County Borders Lat/Lon Grid

TABLE I**AM STATIONS IN THE RAESE KEYSER, WV MARKET ANALYSIS****JUNE 2006**

CALL ARN LATITUDE	ST LONGITUDE	CITY OWNER	FREQ	PAT	AG	PWR	DESC
WELD BL19880310AC 39-03-08.0 N	WV 79-00-21.0 W	FISHER THUNDER ASSOCIATES, LLC	690.00000	LD		2.000	NDD
WCMD Fac. ID 49381 39-38-36.0 N	MD 78-44-35.0 W	CUMBERLAND BROADCAST COMMUNICATIONS, INC.	1230.00000	LU		1.000	ND1
WFRB BL19860109AE 39-41-02.0 N	MD 78-57-57.0 W	FROSTBURG WTBO-WKGO CORPORATION, L.L.C.	560.00000	LD		5.000	ND1
WKLP Fac. ID 62340 39-26-12.0 N	WV 78-57-21.0 W	KEYSER STARCAST SYSTEMS, INC.	1390.00000	LD		1.000	ND1
WTBO Fac. ID 74082 39-38-43.0 N	MD 78-45-05.0 W	CUMBERLAND WTBO-WKGO CORPORATION, L.L.C.	1450.00000	LU		1.000	ND1
WCBC Fac. ID 14717 39-40-28.0 N	MD 78-46-48.0 W	CUMBERLAND CUMBERLAND BROADCASTING COMPANY	1270.00000	LD	AG	5.000	DA2
WZSK BL19831011AD 40-00-26.0 N	PA 78-21-44.0 W	EVERETT NEW MILLENNIUM COMMUNICATIONS GROUP, INC.	1040.00000	LD		10.000	NDD

TABLE II**FM STATIONS IN THE RAESE KEYSER, WV MARKET ANALYSIS****JUNE 2006**

CALL ARN LATITUDE	ST OWNER LONGITUDE	CITY HAAT:m AMSL:m	FREQ	CHN	CL	ERP	STAT
WQZK-FM BLH20030320AAN 39-25-08.0 N	WV STARCAST SYSTEMS, INC. 78-57-13.0 W	KEYSER 245.579 624.000	94.10000		B	21000.00	LIC
WELD-FM BLH19970919KA 38-58-34.0 N	WV THUNDER ASSOCIATES, LLC 79-01-13.0 W	PETERSBURG 156.092 613.000	101.70000		A	1900.00	LIC
WKHJ BMLH19980304KF 39-24-37.0 N	MD SOUTHERN HIGHLANDS, INC. 79-17-15.0 W	MOUNTAIN LAKE PARK 203.368 966.000	104.50000		A	1500.00	LIC
WQWV BLH19970321KB 39-02-16.0 N	WV MCGUIRE BROADCASTING, LLC 79-05-23.0 W	FISHER 420.224 847.000	103.70000		A	310.00	LIC
WAIJ BLED19841001DW 39-42-14.0 N	MD HE'S ALIVE, INCORPORATED 79-05-31.0 W	GRANTSVILLE 170.618 922.000	90.30000		B	10000.00	LIC
WAUA BLED20040510ABJ 39-12-07.0 N	WV WEST VIRGINIA EDUCATIONAL BROADCASTING AUTHORITY 79-16-31.0 W	PETERSBURG 320.961 1173.000	89.50000		B	10000.00	LIC
WWPN BLH19930921KA 39-22-58.0 N	MD ERNEST F. SANTMYIRE 79-04-43.0 W	WESTERNPORT 417.882 954.000	101.10000		A	320.00	LIC
WUSQ-FM BLH19880405KB 39-10-38.0 N	VA CAPSTAR TX LIMITED PARTNERSHIP 78-15-53.0 W	WINCHESTER 207.000 482.000	102.50000		B	32000.00	LIC
WDZN BLH19910802KC 39-25-20.0 N	WV CHARTER EQUITIES, INC. 78-47-25.0 W	ROMNEY 252.934 538.000	100.10000		A	480.00	LIC

TABLE II Page 2**FM STATIONS IN THE RAESE KEYSER, WV MARKET ANALYSIS****JUNE 2006**

WTRM	VA	WINCHESTER	91.30000	B	5600.00	LIC
BLED20051207ABI TIMBER RIDGE MINISTRIES, INC.						
39-11-02.0 N 78-23-15.0 W 434.171 812.000						
WVEP	WV	MARTINSBURG	88.90000	B	3600.00	LIC
BLED19870220KA WEST VIRGINIA EDUCATIONAL BROADCASTING AUTHORITY						
39-08-38.0 N 78-26-09.0 W 490.658 900.000						
WFRB-FM	MD	FROSTBURG	105.30000	B	13500.00	LIC
BLH19851104KE WTBO-WKGO CORPORATION, L.L.C.						
39-41-02.0 N 78-57-57.0 W 294.421 966.000						
WLIC	MD	FROSTBURG	97.10000	A	150.00	LIC
BLED19940214KC HE'S ALIVE, INCORPORATED						
39-34-54.0 N 78-53-58.0 W 416.763 899.000						
WCBC-FM	WV	KEYSER	107.10000	A	530.00	LIC
Unknown or New CP BLH19880825KE PROSPERITAS BROADCASTING SYSTEM, LP						
39-31-26.0 N 78-51-44.0 W 247.303 610.000						
WVSB	WV	ROMNEY	104.10000	A	100.00	LIC
BLED19980528KA WEST VA. SCHS. FOR DEAF AND BLIND						
39-18-56.0 N 78-43-04.0 W 238.632 591.000						
WROG	MD	CUMBERLAND	102.90000	B	3500.00	LIC
BLH19880414KA BROADCAST COMMUNICATIONS, INC.						
39-34-56.0 N 78-53-53.0 W 432.197 917.000						
WFWM	MD	FROSTBURG	91.90000	B1	1300.00	LIC
BLED19970825KA FROSTBURG STATE UNIVERSITY						
39-34-54.0 N 78-53-53.0 W 427.539 913.000						
WKGO	MD	CUMBERLAND	106.10000	B	5400.00	LIC
BLH19980109KD WTBO-WKGO CORPORATION, L.L.C.						
39-34-54.0 N 78-53-58.0 W 434.763 917.000						
WDYK	WV	RIDGELEY	100.50000	A	4600.00	CP MOD
BMPH20060421ABL RADIOACTIVE, LLC						
39-43-02.8 N 78-42-42.5 W 114.342 515.000						