

MULTIPLE OWNERSHIP STUDY

The following engineering statement and attached exhibits have been prepared for **Heartland Comm. License, LLC** ("Heartland"), licensee of several commercial broadcast stations in the state of Wisconsin, and are in support of their multiple ownership study for the acquisition of two additional facilities. It is proposed that Heartland acquire FM stations WCYE(FM) at Three Lakes, Wisconsin, and WHOH(FM) at Rhinelander, Wisconsin.¹ The acquisition of these two facilities would be in compliance with the provisions of Section 73.3555 of the Commission's Rules.

The Heartland facilities and proposed acquisitions have been divided into two different clusters. Exhibit E-1 illustrates the principal community coverage contours for the Heartland facilities. As is indicated on this map, the proposed acquisition only impacts one cluster of Heartland stations. The facilities indicated on this map are summarized in the following table.

Callsign	City of License	Facility ID	Service	Contour Color
WJJH(FM)	Ashland, WI	4074	FM	Blue
WRJO(FM)	Eagle River, WI	4908	FM	Green
WNXR(FM)	Iron River, WI	8611	FM	Red
WBSZ(FM)	Ashland, WI	24084	FM	Orange
WATW	Ashland, WI	4078	AM	Magenta
WERL	Eagle River, WI	4907	AM	Yellow
WCYE(FM)	Three Lakes, WI	49802	FM	Black
WHOH(FM)	Rhinelander, WI	109431	FM	Cyan

In Exhibit E-2, the eastern cluster of stations is depicted, and the common contour overlap that results in the creation of two contour based markets. The stations involved are not considered home to rated Arbitron markets. As a result, the contour method is applicable. The first contour market is depicted by cyan shading, while the second market is denoted by yellow shading.

¹ The Facility ID for WCYE(FM) at Three Lakes, Wisconsin is 49802. The Facility ID for WHOH(FM) at Rhinelander, Wisconsin is 190431.

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Exhibit E-3 provides the analysis for contour market #1. This market is defined by the common overlap between WRJO(FM) at Eagle River, WCYE(FM) at Three Rivers, and WERL at Eagle River. This market is defined by the common overlap between three facilities, two of which are in the same service. As a result of this facility concentration, it is necessary and sufficient to demonstrate that Heartland would not control greater than fifty percent of the stations serving the market. Exhibit E-3 demonstrates that at least six other stations serve the market. Contour market #1 is therefore in compliance with the provisions of Section 73.3555 of the Commission's Rules. The following table summarizes the facilities analyzed for this market.

Callsign	City of License	Facility ID	Service	Contour Color
WRJO(FM)	Eagle River, WI	4908	FM	Blue
WCYE(FM) ²	Three Rivers, WI	49802	FM	Green
WERL	Eagle River, WI	4907	AM	Red
KSPF(FM)	Rhineland, WI	171922	FM	Orange
WHDG(FM)	Rhineland, WI	55211	FM	Magenta
WHSF(FM)	Rhineland, WI	172402	FM	Yellow
WMQA-FM	Rhineland, WI	55209	FM	Black
WRHN(FM)	Rhineland, WI	49800	FM	Gold
WXPR(FM) ²	Rhineland, WI	72220	FM	Grey

The second contour market is analyzed under Exhibit E-4. This market is defined by the overlap between WVYE(FM) at Three Rivers, WHOH(FM) at Rhineland, and WERL at Eagle River. As was the case with the first market, this market is also defined by the common overlap between three facilities, two of which are in the same service. It is necessary and sufficient to demonstrate that Heartland would not control greater than fifty percent of the stations serving the market. Exhibit E-4 also demonstrates that at least six other stations serve the market. Contour market #2 is therefore also in compliance with the provisions of Section 73.3555 of the Commission's Rules. The following table summarizes the facilities analyzed for contour market #2.

² The technical parameters for WCYE(FM) and WXPR(FM) are similar, resulting in similar contours.

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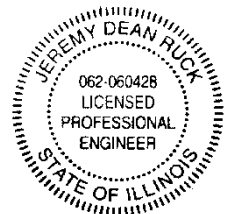
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Callsign	City of License	Facility ID	Service	Contour Color
WCYE(FM) ²	Three Rivers, WI	49802	FM	Blue
WERL	Eagle River, WI	4907	FM	Red
WHOH(FM)	Rhineland, WI	190431	AM	Green
KSPF(FM)	Rhineland, WI	171922	FM	Orange
WHDG(FM)	Rhineland, WI	55211	FM	Magenta
WHSF(FM)	Rhineland, WI	172402	FM	Black
WMQA-FM	Minocqua, WI	55209	FM	Cyan
WRHN(FM)	Rhineland, WI	49800	FM	Gold
WXPR(FM) ²	Rhineland, WI	72220	FM	Grey

Since both of the markets under consideration comply with Section 73.3555 of the Commission's Rules, the proposed acquisition of WCYE(FM) and WHOH(FM) would comply with the provisions of Section 73.3555 of the Commission's Rules.

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.

Above signature is digitized copy of actual signature
License Expires November 30, 2019

Jeremy D. Ruck, PE
August 2, 2018

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