

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
WEST VIRGINIA RADIO CORPORATION
OF THE ALLEGHENIES
MIDLAND, MARYLAND**

NOVEMBER 2006

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This engineering statement and supporting tabulations and figures have been prepared on behalf of **West Virginia Radio Corporation of the Alleghenies (“WVRCOA”)**. The purpose of this statement is to demonstrate **WVRCOA** compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of AM and FM broadcast facilities.

WVRCOA proposes common ownership in the following four stations in the Midland, Maryland market and currently owns one AM and two FM stations in West Virginia in near proximity. All four stations are listed below:

NEW (FM)	Midland, MD	99.5 MHz	0.92 kW	ID 166026
WDYK(FM)	Ridgley, WV	100.5 MHz	4.60 kW	ID 164255
WQZK-FM	Keyser, WV	94.1 MHz	21.0 kW	ID 62339
WKLP(AM)	Keyser, WV	1390 kHz	1 kW LD-D	ID 62340

The four stations are considered as one market since the principal community contours of each station have an area of common overlap. *Figure 1* depicts all current commonly owned West Virginia Radio Corporation stations, while *Figure 2* depicts the four station Midland market as described above which make up a market distinct and separate from the other owned facilities.

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). Counties in the Midland, Maryland market are Allegheny, Mineral, Garrett, Grant, Hardy and Hampshire. None of the communities of license are located in an Arbitron defined survey area. 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.

Table I lists all AM stations whose 5 mV/m contour duplicates some portion of the market. The contours for these additional stations are plotted on *Figure 3* in salmon along with the Midland, Maryland market.

Table II lists all FM stations whose 70 dBu contour duplicates some portion of the market. The contours for these additional stations are plotted on *Figure 4* in blue along with the Midland, Maryland 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 18 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.

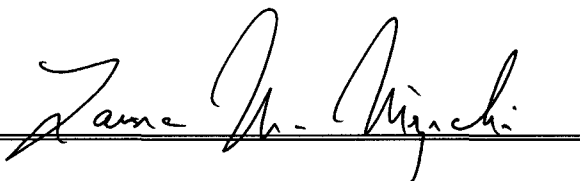
Stations in the market are:

Market 1: Attributable Stations - 4 Stations (1 AM & 3 FM)
NEW(FM), Midland,MD, WDYK(FM), WQZK-FM and WKLP(AM)

Non Attributable Stations in Market = 21

It is noted that licensed facilities holding a construction permit have been counted as only one station for market purposes.

The foregoing was prepared on behalf of **West Virginia Radio Corporation of the Alleghenies** 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 

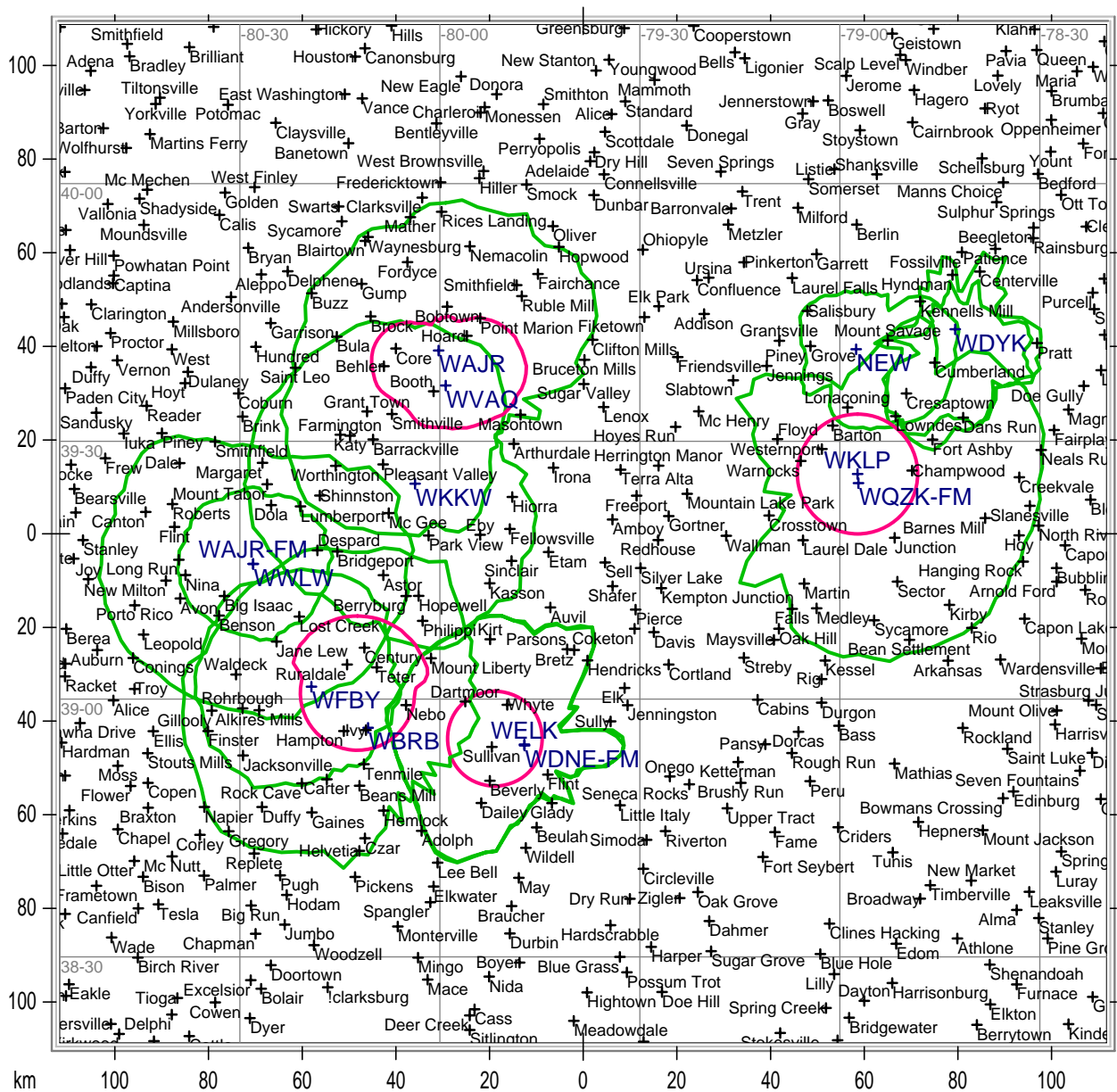
Laura M. Mizrahi

for Communications Technologies, Inc.

Marlton, New Jersey

November 29, 2006

WV Radio Corp. owned AM & FM stations in the states of West Virginia and Maryland



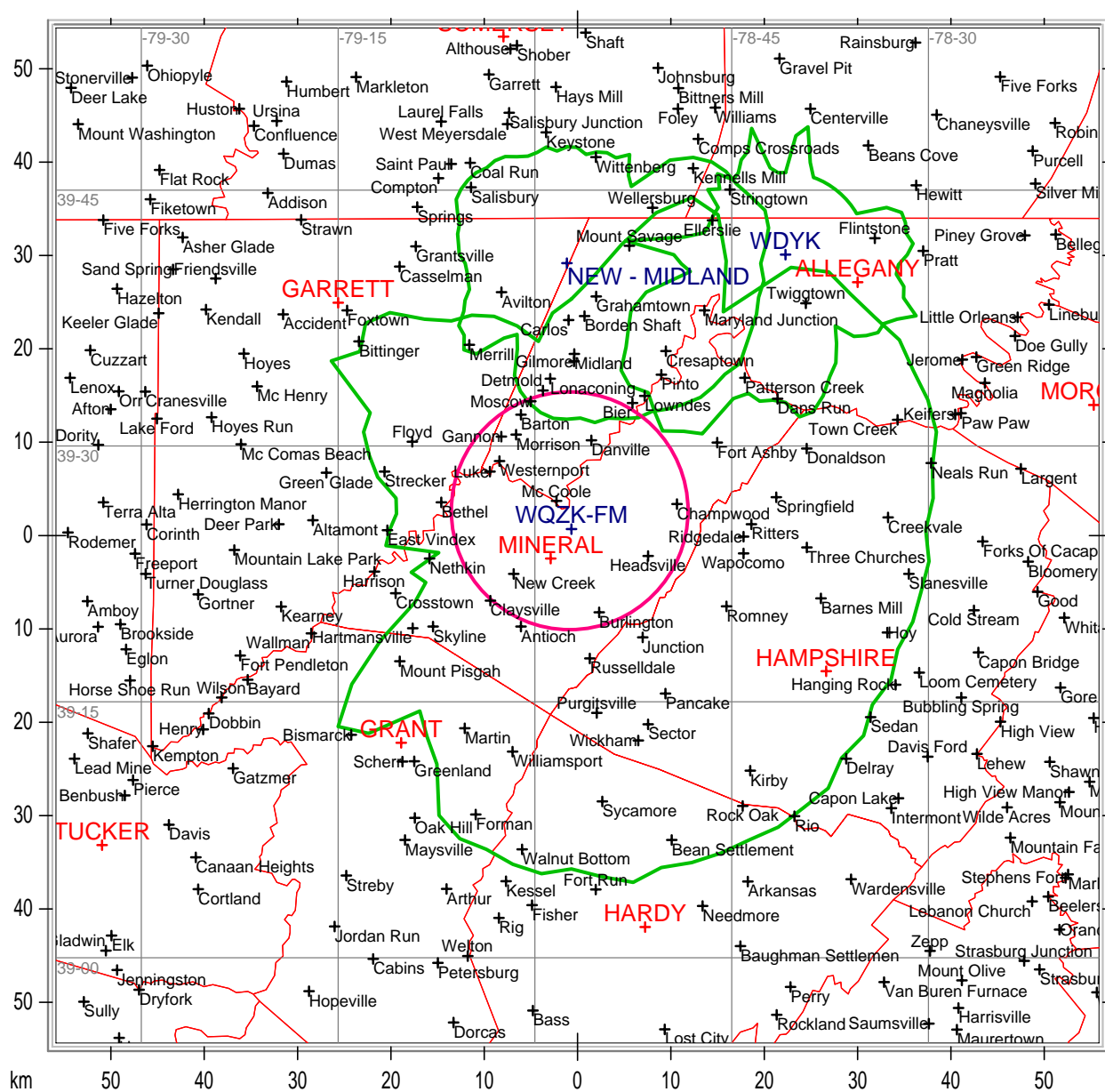
Communications Technologies, Inc. Marlton, New Jersey

Lat/Lon Grid

Map Scale: 1:1440000 1 cm = 14.40 km V/H Size: 217.42 x 223.50 km

Figure 1

Proposed WV Radio Corp. of the Alleghenies owned stations, Midland, WV Green = FM, Pink = AM



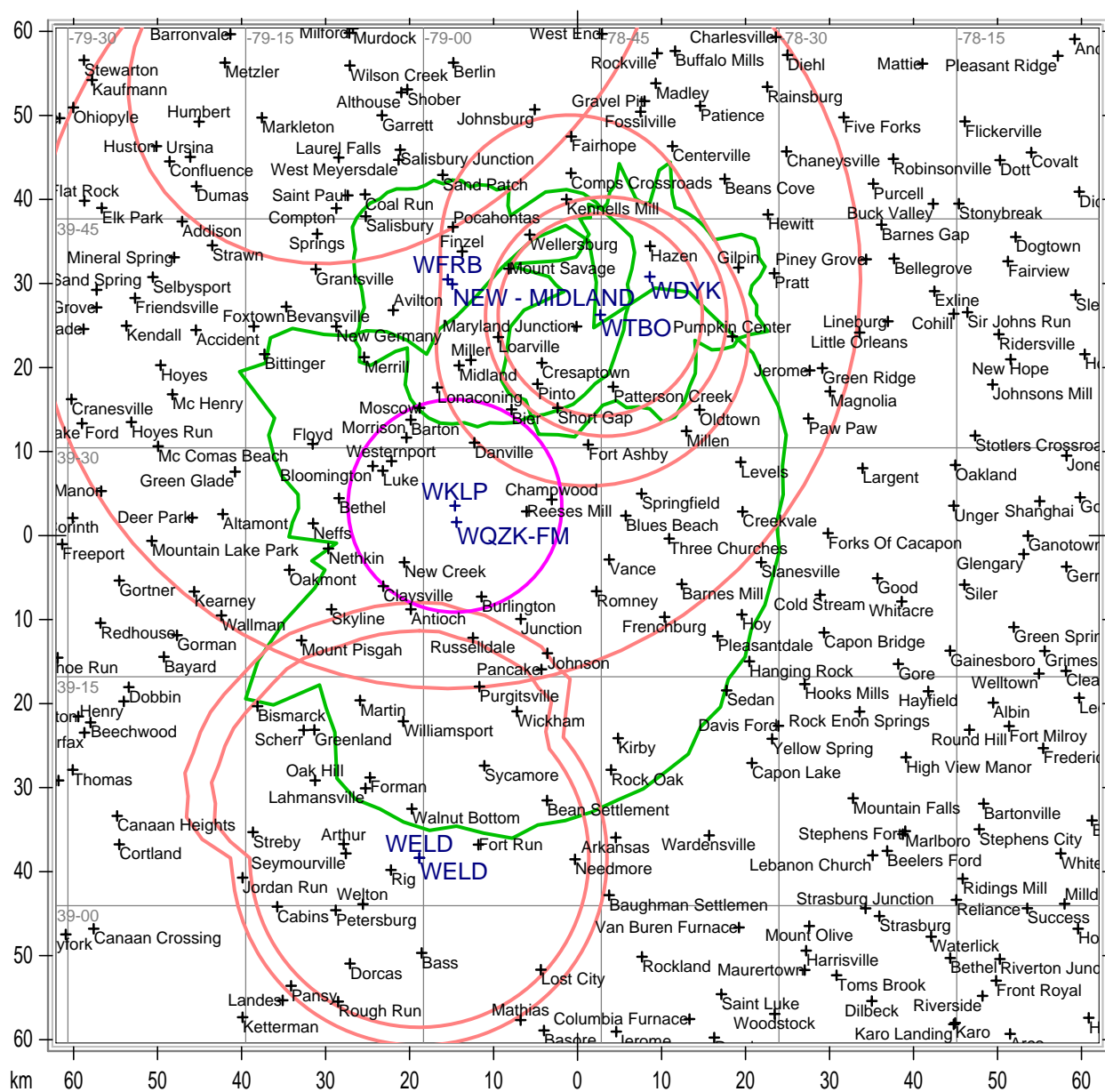
Communications Technologies, Inc. Marlton, New Jersey

County Borders Lat/Lon Grid

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

Figure 2

Prop. WV Radio Corp. owned stations, Midland, WV Green = FM, Pink = AM, Other AM = Salmon



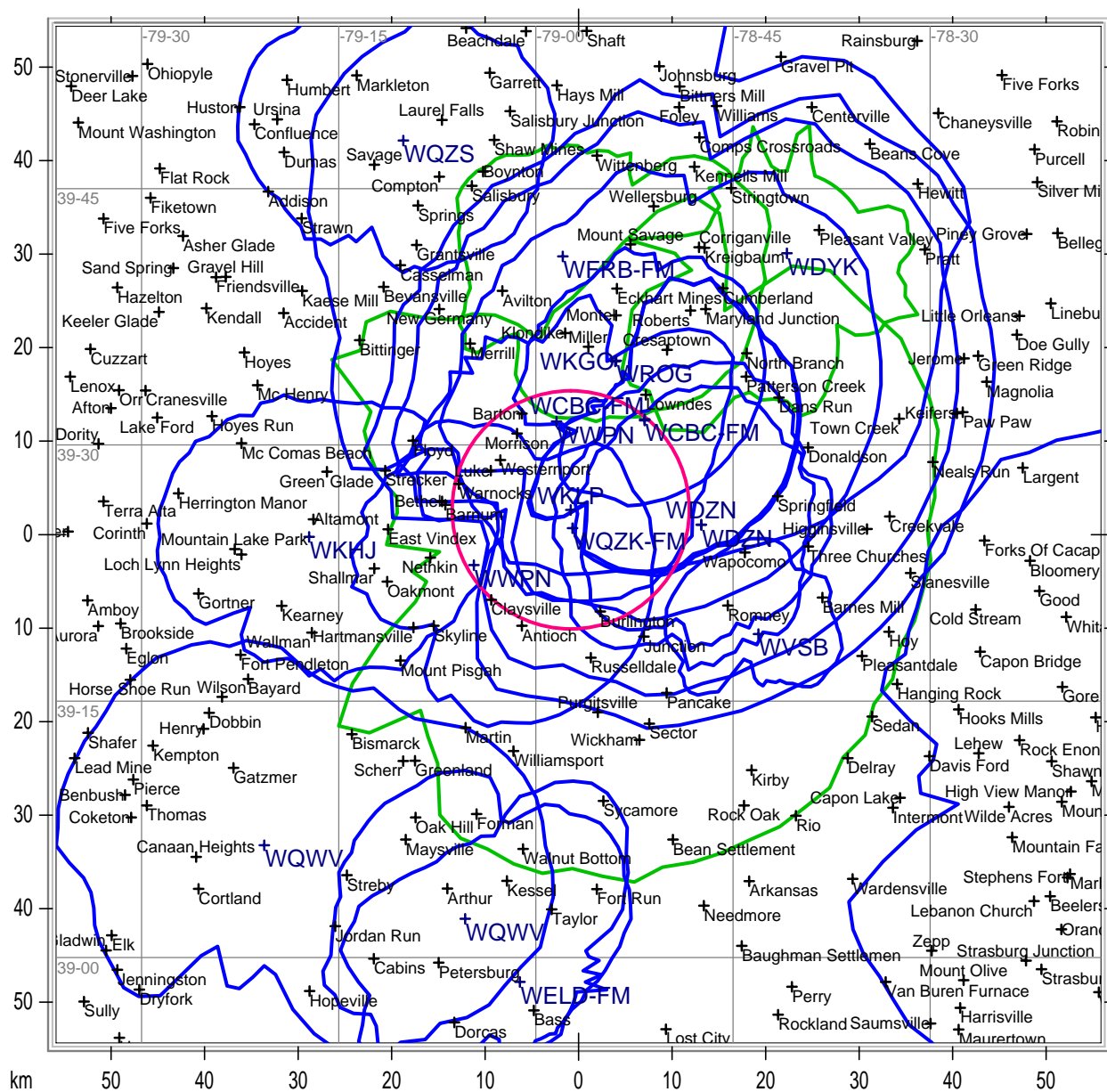
Communications Technologies, Inc. Marlton, New Jersey

Lat/Lon Grid

Map Scale: 1:800000 1 cm = 8.00 km V/H Size: 120.79 x 124.17 km

Figure 3

Prop. WV Radio Corp. owned stations, Midland, WV Green = FM, Pink = AM, Other FM = Blue



Communications Technologies, Inc. Marlton, New Jersey

Lat/Lon Grid

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

Figure 4