

Engineering Statement
RADIO MULTIPLE OWNERSHIP STUDY
prepared for
Boston Broadcasting II, LLC

Introduction

Nassau Broadcasting I, L.L.C., through wholly owned subsidiaries *Nassau Broadcasting II, LLC*; and *Nassau Broadcasting III, LLC* (collectively “*Nassau*”), owns and operates radio stations throughout the United States. As detailed in the instant application, it is proposed that the licenses of one *Nassau* FM station will be assigned to Boston Broadcasting II, LLC (herein “*Boston Company*”). Parties with an attributable interest in *Boston Company* also will have an attributable interest in *Nassau*, which will continue to own one FM station that is located within the same market as that of the proposed *Boston Company* station.

This statement has been prepared on behalf of *Nassau* using information provided by *Nassau* and their representatives to demonstrate compliance with the Rules of the Federal Communications Commission as it governs common ownership of multiple radio stations serving the same market. This Study demonstrates that the *Boston Company's* proposed holdings fully complies with radio multiple-ownership provisions of §73.3555 of the Commission’s Rules.

Radio Multiple Ownership

The Commission issued a *Report and Order* and *Notice of Proposed Rulemaking* (“*R&O*”)¹ for various multiple ownership and cross ownership issues. The *R&O* establishes a means of evaluating radio station multiple ownership issues utilizing existing *Arbitron*®² and *BIA*® MEDIA Access Pro™³ market data for analysis of markets with established geographic boundaries⁴.

Boston Company proposes to own or have a cognizable interest in radio station WCRB(FM), Lowell, Massachusetts (Facility ID 23441), which is “home” to the Boston

- 1 Report and Order in MB Docket No. 02-277 and MM Docket Nos. 01-235, 01-317, and 00-244, and Notice of Proposed Rulemaking for MB Docket 03-130 FCC-03-127, (adopted June 2, 2003)(released July 2, 2003).
- 2 Arbitron® is a registered mark of Arbitron Inc.
- 3 MEDIA Access Pro™ is a trademark of BIA® Financial Network Inc.
- 4 As an initial matter, the geographical boundaries of a market are established by reference to the boundaries of the markets established by Arbitron®. Within that market, the FCC requires that the BIA® count of stations operating in the market be employed.

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Arbitron® radio market. In addition, *Nassau* is the licensee of WFNQ(FM), Nashua, New Hampshire (Facility ID 23329), which is “home” to the Boston market. Because WFNQ(FM) and WCRB(FM) are both home to the same radio market and certain parties will have an attributable interest in the licensees of both stations, the multiple ownership Rule is triggered.

As shown in **Attachment 1**, there are 98 radio stations in the Boston *Arbitron®* market. Pursuant to §73.3555 of the Commission’s Rules, a licensee may own or have cognizable interest in no more than eight stations, of which no more than five can be in any one service, in a market containing 45 or more stations. Thus, the attributable ownership of two radio stations in the Boston market would comply with this Rule.

As shown herein, *Boston Company* is in compliance with §73.3555 of the Commission’s Rules regarding the multiple ownership of radio stations in a single market. This conclusion was based on the *BIA®* definition for the *Arbitron®* Boston radio market.

Certification

Under the penalty of perjury, the undersigned hereby certifies that the foregoing statement was prepared by him or under his direction on behalf of *Nassau* and that it is true and correct to the best of his knowledge and belief. Mr. Ryson is a senior engineer in the firm of *Cavell, Mertz & Associates, Inc.* and has submitted numerous engineering exhibits to the Federal Communications Commission. His qualifications are a matter of record with the Commission.



Daniel G. Ryson
April 24, 2009

Cavell, Mertz & Associates, Inc.
7839 Ashton Avenue
Manassas, Virginia 20109
(703) 392-9090



FCC Geographic Market Definition for Boston, MA

Attachment 1

Call Letters	AM/FM	Freq	Station	Type	Market			Home Market	Designntn Date	Home Mkt Rank	Owner	City & State of License	County of License
WAAF	FM	107.3	C	Rock	Boston, MA			Boston, MA	07/02/2003	10	Entercom	Westborough, MA	Worcester
WMSX	AM	1410	C	DARK	Boston, MA			Boston, MA	07/02/2003	10	p Kingdom Church	Brockton, MA	Plymouth
WATD	FM	95.9	C	AC/Oldies	Boston, MA			Boston, MA	07/02/2003	10	Marshfield Broadcasting Co	Marshfield, MA	Plymouth
WBCN	FM	104.1	C	Alternative	Boston, MA			Boston, MA	07/02/2003	10	CBS Radio	Boston, MA	Suffolk
WXBR	AM	1460	C	News/Talk	Boston, MA			Boston, MA	07/02/2003	10	BusinessTalkRadio.net Inc	Brockton, MA	Plymouth
WJMN	FM	94.5	C	UrCHR/Rhy	Boston, MA			Boston, MA	07/02/2003	10	Clear Channel Communications Inc	Boston, MA	Suffolk
WBRS	FM	100.1	NC	Variety	Boston, MA			Boston, MA	07/02/2003	10	Brandeis University	Waltham, MA	Middlesex
WNSH	AM	1570	C	News/Talk	Boston, MA			Boston, MA	07/02/2003	10	Willow Farm Incorporated	Beverly, MA	Essex
WBZ	AM	1030	C	Nws/TKl/Spt	Boston, MA			Boston, MA	07/02/2003	10	CBS Radio	Boston, MA	Suffolk
WCAP	AM	980	C	Nws/TKl/Spt	Boston, MA			Boston, MA	07/02/2003	10	Merrimack Valley Radio LLC	Lowell, MA	Middlesex
WJIB	AM	740	C	Adlt Stdnd	Boston, MA			Boston, MA	07/02/2003	10	Bob Bittner Broadcasting Inc	Cambridge, MA	Norfolk
WJOE	AM	700	C	Sports	Boston, MA			Boston, MA	12/16/2004	10	Northeast Broadcasting Company	Athol, MA	Worcester
WKAF	FM	97.7	C	Rock	Boston, MA			Boston, MA	07/02/2003	10	Entercom	Brockton, MA	Plymouth
WCCM	AM	1110	C	News/Talk	Boston, MA			Boston, MA	09/10/2007	10	Costa Eagle Broadcasting Inc	Salem, NH	Rockingham
WNBZ	AM	1450	C	Adlt Stdnd	Boston, MA			Boston, MA	07/02/2003	10	p Port Broadcasting LLC	Newburyport, MA	Essex
WVBF	AM	1530	C	Information	Boston, MA			Boston, MA	07/02/2003	10	Callahan, Steven J	Middleborough Center, MA	Plymouth
WMKK	FM	93.7	C	Rock AC	Boston, MA			Boston, MA	07/02/2003	10	Entercom	Lawrence, MA	Essex
WCMX	AM	1000	NC	Christian	Boston, MA			Boston, MA	07/02/2003	10	Twin City Baptist Temple	Leominster, MA	Worcester
WBOS	FM	92.9	C	Modern	Boston, MA			Boston, MA	07/02/2003	10	Greater Media Inc	Brookline, MA	Norfolk
WCRB	FM	99.5	C	Classical	Boston, MA			Boston, MA	07/02/2003	10	Nassau Broadcasting Partners LP	Lowell, MA	Suffolk
WRCA	AM	1330	C	Ethnic	Boston, MA			Boston, MA	07/02/2003	10	Beasley Broadcast Group	Waltham, MA	Middlesex
WEZE	AM	590	C	Chrst/Talk	Boston, MA			Boston, MA	07/02/2003	10	Salem Communications Corporation	Boston, MA	Suffolk
WEIM	AM	1280	C	FullService	Boston, MA			Boston, MA	07/02/2003	10	Central Broadcasting Co	Fitchburg, MA	Worcester
WESX	AM	1230	C	Ethnc/Chrst	Boston, MA			Boston, MA	07/02/2003	10	Principle Broadcasting Network LLC	Nahant, MA	Essex
WMKI	AM	1260	C	Family Hits	Boston, MA			Boston, MA	07/02/2003	10	ABC/Disney	Boston, MA	Suffolk
WFGL	AM	960	NC	Chrst/Info	Boston, MA			Boston, MA	07/02/2003	10	p Calvary Chapel of Costa Mesa	Fitchburg, MA	Worcester
WFNX	FM	101.7	C	Alternative	Boston, MA			Boston, MA	07/02/2003	10	Phoenix Media Communications	Lynn, MA	Essex
WGAW	AM	1340	C	Talk/News	Boston, MA			Boston, MA	07/02/2003	10	Northeast Broadcasting Company	Gardner, MA	Worcester
WCEC	AM	1490	C	Spn/TKl/Nws	Boston, MA			Boston, MA	07/02/2003	10	Costa Eagle Broadcasting Inc	Haverhill, MA	Essex
WEEL	AM	850	C	Sports	Boston, MA			Boston, MA	07/02/2003	10	Entercom	Boston, MA	Suffolk
WHRB	FM	95.3	C	Diverse	Boston, MA			Boston, MA	07/02/2003	10	Harvard Radio Broadcasting	Cambridge, MA	Suffolk
WODS	FM	103.3	C	Oldies	Boston, MA			Boston, MA	07/02/2003	10	CBS Radio	Boston, MA	Suffolk

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

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Boston, MA

Call Letters	AM/FM	Type		Home Market	Market		City & State of License	County of License
		Freq	Station	Format	Designtn Date	Home Mkt Rank		
WILD	AM	1090	C	Talk	07/02/2003	10	Boston, MA	Suffolk
WDIS	AM	1170	C	Talk	07/02/2003	10	Boston, MA	Norfolk
WJDA	AM	1300	C	Ethnc/Chrst	07/02/2003	10	Quincy, MA	Norfolk
WKLX	FM	102.5	C	Country	07/02/2003	10	Waltham, MA	Middlesex
WZLX	FM	100.7	C	Clsc Rock	07/02/2003	10	Boston, MA	Suffolk
WKOX	AM	1200	C	Tropical	07/02/2003	10	Framingham, MA	Middlesex
WLLH	AM	1400	C	Sports	07/02/2003	10	Lowell, MA	Middlesex
WLYN	AM	1360	C	Ethnc/Varty	07/02/2003	10	Lynn, MA	Essex
WXRVR	FM	92.5	C	AAA	07/02/2003	10	Andover, MA	Essex
WFEX	FM	92.1	C	Alternative	07/02/2003	10	Peterborough, NH	Hillsborough
WWDJ	AM	1150	C	Spann/Chrst	07/02/2003	10	Boston, MA	Suffolk
WMJX	FM	106.7	C	AC	07/02/2003	10	Boston, MA	Suffolk
WMRC	AM	1490	C	AC	07/02/2003	10	Millford MA	Worcester
WWZN	AM	1510	C	Sprts/Talk	07/02/2003	10	Boston, MA	Suffolk
WNTN	AM	1550	C	Variety	07/02/2003	10	Newton, MA	Middlesex
WGHI	AM	900	C	Sports	11/05/2007	10	Nashua, NH	Hillsborough
WPLM	AM	1390	C	BNw/Tlk/AC	07/02/2003	10	Plymouth, MA	Plymouth
WPLM	FM	99.1	C	Easy/AdStd	07/02/2003	10	Plymouth, MA	Plymouth
WRKO	AM	680	C	News/Talk	07/02/2003	10	Boston, MA	Suffolk
WROL	AM	950	C	Chrst/Talk	07/02/2003	10	Boston, MA	Suffolk
WBMX	FM	98.5	C	AC	07/02/2003	10	Boston, MA	Suffolk
WSRO	AM	650	C	Portg/Chrst	07/02/2003	10	Ashland, MA	Middlesex
WSMN	AM	1590	C	News/Talk	07/30/2003	10	Nashua, NH	Hillsborough
WAZN	AM	1470	C	Ethnc/Varty	07/02/2003	10	Watertown, MA	Middlesex
WTKK	FM	96.9	C	Talk	07/02/2003	10	Boston, MA	Middlesex
WBIX	AM	1060	C	Bus News	07/02/2003	10	Natick, MA	Middlesex
WUNR	AM	1600	C	Ethnc/News	07/02/2003	10	Brookline, MA	Norfolk
WROR	FM	105.7	C	Clsc Hills	07/02/2003	10	Framingham, MA	Middlesex
WBOQ	FM	104.9	C	Oldies	07/02/2003	10	Gloucester, MA	Essex
WNNW	AM	800	C	Tropical	07/02/2003	10	Lawrence, MA	Essex
WXKS	AM	1430	C	Tropical	07/02/2003	10	Everett, MA	Middlesex
WXKS	FM	107.9	C	CHR	07/02/2003	10	Medford, MA	Middlesex

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Market					City & State of License	County of License				
Call Letters	AM/ FM	Freq	Type Station	Format			Home Market	Designtn Date	Home Mkt Rank	Owner
WXLO	FM	104.5	C	Hot AC	Worcester, MA	07/02/2003	114	Citadel Communications	Fitchburg, MA	Worcester
WFNQ	FM	106.3	C	Clsc Hils	Manchester, NH	07/02/2003	191	Nassau Broadcasting Partners LP	Nashua, NH	Hillsborough
WBNW	AM	1120	C	BusNw/Talk	Boston, MA	07/02/2003	10	Money Matters Radio Inc	Concord, MA	Middlesex
WTPL	FM	107.7	C	Nws/Tlk/Spt	Manchester, NH	07/02/2003	191	Great Eastern Radio LLC	Hillsboro, NH	Hillsborough
WXRQ	FM	99.9	C	AAA	Boston, MA	07/02/2003	10	Northeast Broadcasting Company	Athol, MA	Worcester
WAMG	AM	890	C	Sports	Boston, MA	07/02/2003	10	J Sports Boston LLC	Dedham, MA	Norfolk
WAVM	FM	91.7	NC	Variety	Boston, MA	07/02/2003	10	Maynard School Committee	Maynard, MA	Middlesex
WBIM	FM	91.5	NC	Variety	Boston, MA	07/02/2003	10	Bridgewater State College	Bridgewater, MA	Plymouth
WBMT	FM	88.3	NC	AOR	Boston, MA	07/02/2003	10	Masconomet Regional School District	Boxford, MA	Essex
WBUR	FM	90.9	NC	NPR/Nws/TI	Boston, MA	07/02/2003	10	Boston University	Boston, MA	Suffolk
WDJM	FM	91.3	NC	Variety	Boston, MA	07/02/2003	10	Framingham State College	Framingham, MA	Middlesex
WERS	FM	88.9	NC	Variety	Boston, MA	07/02/2003	10	Emerson College	Boston, MA	Suffolk
WGAO	FM	88.3	NC	AOR	Boston, MA	07/02/2003	10	Dean College	Franklin, MA	Norfolk
WGBH	FM	89.7	NC	Clc/Jaz/Nws	Boston, MA	07/02/2003	10	WGBH Educational Foundation	Boston, MA	Suffolk
WHAB	FM	89.1	NC	Varty/Info	Boston, MA	07/02/2003	10	Acton/Boxborough Regional School District	Acton, MA	Middlesex
WHHB	FM	99.9	NC	Variety	Boston, MA	07/02/2003	10	Holliston High School	Holliston, MA	Middlesex
WIQH	FM	88.3	NC	AOR	Boston, MA	07/02/2003	10	Concord Carlisle Reg School District	Concord, MA	Middlesex
WUML	FM	91.5	NC	Variety	Boston, MA	07/02/2003	10	University of Massachusetts	Lowell, MA	Middlesex
WMBR	FM	88.1	NC	Variety	Boston, MA	07/02/2003	10	Technology Broadcasting Corp	Cambridge, MA	Middlesex
WMFO	FM	91.5	NC	Variety	Boston, MA	07/02/2003	10	Tufts College	Medford, MA	Middlesex
WMLN	FM	91.5	NC	Variety	Boston, MA	07/02/2003	10	Curry College	Milton, MA	Norfolk
WMWM	FM	91.7	NC	Alt/Pgv/Var	Boston, MA	07/02/2003	10	Salem State College	Salem, MA	Essex
WRBB	FM	104.9	NC	Variety	Boston, MA	07/02/2003	10	Northeastern University	Boston, MA	Suffolk
WRPS	FM	88.3	NC	Educational	Boston, MA	07/02/2003	10	Rockland Public Schools	Rockland, MA	Plymouth
WUMB	FM	91.9	NC	Folk	Boston, MA	07/02/2003	10	University of Massachusetts	Boston, MA	Suffolk
WXPL	FM	91.3	NC	Alternative	Boston, MA	07/02/2003	10	Fitchburg State College	Fitchburg, MA	Worcester
WYAJ	FM	97.7	NC	Variety	Boston, MA	07/02/2003	10	Sudbury Valley Broadcasting Foundation	Sudbury, MA	Middlesex
WZBC	FM	90.3	NC	Alternative	Boston, MA	07/02/2003	10	Boston College	Newton, MA	Middlesex
WZLY	FM	91.5	NC	Educational	Boston, MA	07/02/2003	10	Wellesley College	Wellesley, MA	Norfolk
WNEF	FM	91.7	NC	Folk	Boston, MA	07/02/2003	10	University of Massachusetts	Newburyport, MA	Essex
WKMY	FM	91.1	NC	ChrsContem	Boston, MA	07/02/2003	10	Educational Media Foundation	Winchendon, MA	Worcester
WEVS	FM	88.3	NC	Nws/Tlk/Inf	Boston, MA	07/01/2005	10	New Hampshire Public Radio	Nashua, NH	Hillsborough

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WSMA	FM	90.5	NC	ChrsContem	Boston, MA			05/01/2006	10	Calvary Chapel of Twin Falls Inc	Scituate, MA	Plymouth
WWTA	FM	88.5	NC	Variety	Boston, MA			07/02/2003	10	Tabor Academy	Marion, MA	Plymouth

Number of Stations in Geographic Market 98

Previous Stations in Geographic Market

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

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