

MULTIPLE OWNERSHIP STUDY

The following engineering statement and attached exhibits have been prepared for **Jennings County Promotion Partners, LLC** ("Jennings"), proposed assignee of AM broadcast station WJCP at North Vernon, Indiana, and are in support of their multiple ownership study for the acquisition of that facility.¹

The principal in Jennings is Keith Reising, who is also a principal in Reising Radio Partners, Inc. ("Reising"), the licensee of three other broadcast facilities in the vicinity of WJCP. Specifically Reising is the licensee of FM broadcast stations WRZQ-FM at Greensburg, Indiana (Facility ID 74123), WYGB(FM) at Edinburgh, Indiana (Facility ID 18668), and WXCH(FM) at Columbus, Indiana (Facility ID 16255). These three stations, along with the proposed acquisition of WJCP by Jennings are illustrated in the map in Exhibit E-1.

Due to the proximity of these stations to the Indianapolis rated market, constituent counties shaded in yellow, this study is a hybrid between the rated market and contour methodologies. On the rated side, the only station in the cluster that is considered home to the Indianapolis market is WYGB. That station currently has overlap with WXCH and WRZQ-FM, but not with WJCP. The acquisition of WJCP does not affect the facility concentration in the Indianapolis market attributable to Reising.

In addition to the rated market situation discussed, the three Reising facilities also create a contour market. As illustrated in Exhibit E-1, the current Reising contour market is created by the

¹ The Facility ID for WCJP at North Vernon, Indiana is 61196.

JEREMY RUCK & ASSOCIATES, INC.

P.O. Box 415
221 S. 1st Avenue
Canton, IL 61520

Tel: 309.647.1200
Fax: 855.332.9537
jeremyruck.com

common overlap between WRZQ-FM, WYGB, and WXCH.² No change in this market results from the acquisition of WJCP.

The addition of WJCP creates a second contour market, which requires analysis. This market is comprised of the common overlap between WXCH, WRZQ-FM, and WJCP. This market is indicated by magenta shading in a very small area in the map in Exhibit E-1. It should be noted that none of the stations creating this market are considered home to any rated market, thus the contour methodology is applicable.

This market is comprised of three stations, two of which are in the same service. Thus, it is necessary and sufficient to demonstrate that Jennings and Reising would not have a cognizable interest in greater than fifty percent of the stations serving the market. Exhibit E-2 provides the analysis of the market, and demonstrates that there are at least four additional stations serving the market. Each of these four additional stations has a transmitter site located within 92 kilometers of the perimeter of the common overlap defining the market. The stations illustrated in Exhibit E-2 are summarized in the following table.

Callsign	Community	Facility ID	Contour Color	Service
WRZQ-FM	Greensburg, IN	74123	Blue	FM
WXCH	Columbus, IN	16255	Green	FM
WJCP	North Vernon, IN	61196	Red	AM
WINN	Columbus, IN	41891	Orange	FM
WKKG	Columbus, IN	72259	Magenta	FM
WTTS	Trafalgar, IN	59141	Yellow	FM
WWWY	North Vernon, IN	61195	Black	FM

The proposed acquisition of WCJP complies with the provisions of Section 73.3555 of the Commission's Rules. Compliance is demonstrated by the fact that the acquisition of WJCP does

² The contour market area resulting from this combination of facilities is shaded in cyan on Exhibit E-1.

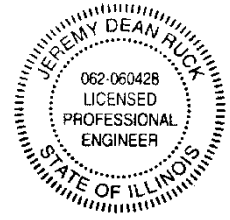
JEREMY RUCK & ASSOCIATES, INC.

P.O. Box 415
221 S. 1st Avenue
Canton, IL 61520

Tel: 309.647.1200
Fax: 855.332.9537
jeremyruck.com

not affect the cognizable interest concentration of the applicant within the rated Indianapolis market nor does it affect the existing contour market, and does comply with the provisions of Section 73.3555(a)(1)(iv) 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
September 17, 2018

JEREMY RUCK & ASSOCIATES, INC.

P.O. Box 415
221 S. 1st Avenue
Canton, IL 61520

Tel: 309.647.1200
Fax: 855.332.9537
jeremyruck.com

9.17.2018

