

EXHIBIT 5

By this application, Cox Radio, Inc. ("Cox") seeks Commission consent to implement the change in community of license for WALR-FM from Greenville, Georgia to Palmetto, Georgia. This exhibit demonstrates that the proposed modification complies with the Commission's local radio ownership rules.

Local Radio Ownership Rule

Under Section 73.3555(a) (1) of the Commission's rules, the FCC uses a tiered approach, as described below, to determine whether a combination of commonly-owned radio stations comply with the local radio ownership limits for any particular market.¹

Full-Power Commercial and NonCommercial Stations in the Market	Maximum Number of Stations in Which a Single Entity May Have an Attributable Interest	Maximum Number of Stations in the Same Service
45 or More Stations	8 Radio Stations	5
Between 30 and 44 Stations	7 Radio Stations	4
Between 15 and 29 Stations	6 Radio Stations	4
14 or Fewer Stations	5 Radio Stations (provided that no entity may have an interest in more than 50% of the stations in the market)	3

To determine the number of stations in a market, the Commission relies on one of three methodologies:

1. Arbitron Methodology: When more than one commonly owned radio station is licensed to a community within an Arbitron Metro Market, the FCC counts the number of commercial and noncommercial radio stations that are either "home" to the Arbitron market or are licensed to a community within that market (the "Arbitron Methodology").²

2. Contour Methodology: For combinations that are licensed to communities outside an Arbitron market, the Commission defines the market as the area where the principal community contours for the commonly-owned stations overlap. To determine the number of stations in that market, the Commission counts all stations whose principal

¹ See 47 C.F.R. 73.3555(a) (1) (2006).

² See *Biennial Review*, 18 FCC Rcd at ¶ 280.

community contours overlap that of at least one of the commonly-owned stations. The Commission, however, excludes all stations whose transmitters are greater than 92 kilometers from the mutual overlap area and any commonly owned stations that are not included already in the market (the “Contour Methodology”).³

3. Arbitron-Contour Hybrid Methodology: The FCC requires an analysis under both the Arbitron Methodology and the Contour Methodology in two situations: (i) if at least one of the commonly-owned stations is “home” to an Arbitron market but it is licensed to a community outside that market or (ii) if a station is licensed to a community within an Arbitron market but its principal community contour overlaps that of another commonly-owned station that is not licensed to a community within any Arbitron market (the “Arbitron-Contour Hybrid Methodology”).⁴

Atlanta, Georgia

WALR’s community of license, Palmetto, Georgia, is located inside the Atlanta Arbitron Metro market, and BIA classifies WALR-FM as “home” to the Atlanta Arbitron metro. Upon grant of the instant application, Cox will be the licensee of the following radio stations that are licensed to communities located within or otherwise “home” to the Atlanta, Georgia Arbitron Metro market:

Station	Arbitron Market of Community of License	“Home” Arbitron Market	Licensee
WALR-FM Palmetto, GA	Atlanta	Atlanta	Cox Radio, Inc.
WSB(AM), Atlanta, GA	Atlanta	Atlanta	Cox Radio, Inc.
WSB-FM, Atlanta, GA	Atlanta	Atlanta	Cox Radio, Inc.
WSBB(FM), Doraville, GA	Atlanta	Atlanta	Cox Radio, Inc.
WSRV(FM), Gainesville, GA	None	Atlanta	Cox Radio, Inc.

Arbitron Methodology: The Arbitron methodology is appropriate for this combination because, with the exception of WSRV(FM), all of the commonly owned radio stations are licensed to a community within the Atlanta Arbitron Metro Market. With respect to WSRV(FM), the principal community contour for WSRV(FM) does not overlap the proposed principal community contour for WALR-FM. The principal community contour for WALR-FM does not overlap any other commonly-owned station.

³ See *id.* At ¶ 285.

⁴ See *id.* At ¶ 286 n.606.

The BIA “FCC Geographic Market Definition for Atlanta, GA” identifies 87 full-power radio stations as “home” to or licensed within the Atlanta, Georgia market.⁵ Therefore, at a minimum, Cox may hold an attributable interest in eight full-power, commercial station stations, of which five may be in the same service (AM or FM). As shown above, Cox owns five radio stations in the Atlanta Metro market (four FMs). As such, its ownership interests comply with respect to this market.

Accordingly, based on the foregoing, Cox respectfully submits that its proposed modification for WALR-FM fully complies with the Commission’s local radio ownership rules.

⁵ See Attachment 1; BIA Financial Network “FCC Geographic Market Definition for Atlanta, GA”, *BIA Investing in Radio 2013 Market Report*.

ATTACHMENT 1

Atlanta, GA Market Overview

Printout from BIA's "FCC Geographic Market Definition for Atlanta, GA"



FCC Geographic Market Definition for Atlanta, GA

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market		Owner	City & State of License	County of License
							Designtn	Home Mkt Rank			
WABE	FM	90.1	NC	Nws/Tlk/Cls	Atlanta, GA	Atlanta, GA	07/02/2003	9	City of Atlanta, Board of Education	Atlanta, GA	Fulton
WAEC	AM	860	C	Christian	Atlanta, GA	Atlanta, GA	07/02/2003	9	Beasley Broadcast Group	Atlanta, GA	Fulton
WAFS	AM	1190	C	Nws/Tlk/Inf	Atlanta, GA	Atlanta, GA	07/02/2003	9	Salem Communications Corporation	Atlanta, GA	Fulton
WALR	FM	104.1	C	Rhythm/Blue	Atlanta, GA	Atlanta, GA	07/02/2003	9	Cox Media Group	Greenville, GA	Meriwether
WAMJ	FM	107.5	C	Urban AC	Atlanta, GA	Atlanta, GA	07/02/2003	9	Radio One Inc	Roswell, GA	Fulton
WAOK	AM	1380	C	News/Talk	Atlanta, GA	Atlanta, GA	07/02/2003	9	CBS Radio	Atlanta, GA	Fulton
WAOS	AM	1600	C	Mexican	Atlanta, GA	Atlanta, GA	07/02/2003	9	La Favorita Inc	Austell, GA	Cobb
WATB	AM	1420	C	Internat'l	Atlanta, GA	Atlanta, GA	07/02/2003	9	Multicultural Radio Broadcasting Inc	Decatur, GA	De Kalb
WAZX	AM	1550	C	Span/Chrst	Atlanta, GA	Atlanta, GA	07/02/2003	9	DTS Broadcasting Inc	Smyrna, GA	Cobb
WBHF	AM	1450	C	Oldies	Atlanta, GA	Atlanta, GA	07/02/2003	9	Anverse Inc	Cartersville, GA	Bartow
WBTR	FM	92.1	C	Country	Atlanta, GA	Atlanta, GA	07/02/2003	9	Gradick, Steven	Carrollton, GA	Carroll
WBZY	FM	105.3	C	Mexican	Atlanta, GA	Atlanta, GA	07/02/2003	9	Clear Channel Communications Inc	Bowdon, GA	Carroll
WCCV	FM	91.7	NC	Religion	Atlanta, GA	Atlanta, GA	07/02/2003	9	Immanuel Broadcasting Network Inc	Cartersville, GA	Bartow
WCFO	AM	1160	C	Nws/Tlk/Inf	Atlanta, GA	Atlanta, GA	07/02/2003	9	JW Broadcasting Inc	East Point, GA	Fulton
WCHK	AM	1290	C	Span/Trpd	Atlanta, GA	Atlanta, GA	07/02/2003	9	Davis Broadcasting Inc	Canton, GA	Cherokee
WCKS	FM	102.7	C	Hot AC	Atlanta, GA	Atlanta, GA	11/01/2010	9	Gradick, Steven	Fruitthurst, AL	Cleburne
WCLK	FM	91.9	NC	Jazz	Atlanta, GA	Atlanta, GA	07/02/2003	9	Clark Atlanta University	Atlanta, GA	Fulton
WCNN	AM	680	C	Sports	Atlanta, GA	Atlanta, GA	07/02/2003	9	Dickey Broadcasting Company	North Atlanta, GA	Fulton
WCOH	AM	1400	C	Sports	Atlanta, GA	Atlanta, GA	07/02/2003	9	Clear Channel Communications Inc	Newnan, GA	Coweta
WDCY	AM	1520	C	Christian	Atlanta, GA	Atlanta, GA	07/02/2003	9	Word Christian Broadcasting	Douglasville, GA	Douglas
WDGR	AM	1210	C	DARK	Atlanta, GA	Atlanta, GA	04/15/2010	9	Word Christian Broadcasting	Dahlonega, GA	Lumpkin
WDPC	AM	1500	C	Christian	Atlanta, GA	Atlanta, GA	07/02/2003	9	Word Christian Broadcasting	Dallas, GA	Paulding
WDWD	AM	590	C	Family Hits	Atlanta, GA	Atlanta, GA	07/02/2003	9	ABC/Disney	Atlanta, GA	Fulton
WFOM	AM	1230	C	Sports	Atlanta, GA	Atlanta, GA	07/02/2003	9	Dickey Broadcasting Company	Marietta, GA	Cobb
WFSH	FM	104.7	C	ChrsContem	Atlanta, GA	Atlanta, GA	07/02/2003	9	Salem Communications Corporation	Athens, GA	Clarke
WFTD	AM	1080	C	Span/Varty	Atlanta, GA	Atlanta, GA	07/02/2003	9	Prieto Broadcasting Inc	Marietta, GA	Cobb
WGFS	AM	1430	C	Ethnic	Atlanta, GA	Atlanta, GA	07/02/2003	9	Multicultural Radio Broadcasting Inc	Covington, GA	Newton
WGKA	AM	920	C	Talk/News	Atlanta, GA	Atlanta, GA	07/02/2003	9	Salem Communications Corporation	Atlanta, GA	Fulton
WGST	AM	640	C	Span/Sprts	Atlanta, GA	Atlanta, GA	07/02/2003	9	Clear Channel Communications Inc	Atlanta, GA	Fulton
WHIE	AM	1320	C	Cty/Tlk/Spt	Atlanta, GA	Atlanta, GA	07/02/2003	9	Chappell Communications LLC	Griffin, GA	Spalding
WHTA	FM	107.9	C	Hip Hop	Atlanta, GA	Atlanta, GA	07/02/2003	9	Radio One Inc	Hampton, GA	Henry
WIFN	AM	1340	C	Talk/Sprts	Atlanta, GA	Atlanta, GA	07/02/2003	9	Dickey Broadcasting Company	Atlanta, GA	Fulton
WIGO	AM	1570	C	Gospel	Atlanta, GA	Atlanta, GA	07/02/2003	9	Sheridan Broadcasting Corp	Morrow, GA	Clayton
WIMO	AM	1300	C	Talk	Atlanta, GA	Atlanta, GA	07/02/2003	9	Country Road Productions	Winder, GA	Barrow

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

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Atlanta, GA

Call Letters	AM/ FM	Freq	Type	Station	Format	Home Market	Market		Owner	City & State of License	County of License
							Designm	Home Mkt			
							Date	Rank			
WISK	AM	990	C	Oldies	Atlanta, GA		02/14/2008	9	Sumter Broadcasting Co Inc	Lawrenceville, GA	Gwinnett
WIVL	FM	88.3	NC	DARK	Atlanta, GA		10/27/2003	9	p Hellinger Foundation Inc	Jasper, GA	Pickens
WJTP	AM	890	C	News/Asian	Atlanta, GA		03/10/2006	9	National Broadcasting Inc	Lithia Springs, GA	Douglas
WKEU	AM	1450	C	Oldies/Sprts	Atlanta, GA		07/02/2003	9	WLT Associates LP	Griffin, GA	Spalding
WKHX	FM	101.5	C	Country	Atlanta, GA		07/02/2003	9	Cumulus Media Holdings Inc	Marietta, GA	Cobb
WKKP	AM	1410	C	Country	Atlanta, GA		07/02/2003	9	Henry County Radio Co	McDonough, GA	Henry
WKUN	AM	1490	C	Gospel	Atlanta, GA		07/02/2003	9	Bostwick Broadcasting Group	Monroe, GA	Walton
WLBA	AM	1130	C	Mexican	Atlanta, GA		07/02/2003	9	La Favorita Inc	Gainesville, GA	Cobb
WLBW	AM	1330	C	News/Talk	Atlanta, GA		07/02/2003	9	Gradick, Steven	Carrollton, GA	Carroll
WLKQ	FM	102.3	C	Mexican	Atlanta, GA		07/02/2003	9	Davis Broadcasting Inc	Buiford, GA	Gwinnett
WLTA	AM	1400	C	Chrst/Talk	Atlanta, GA		07/02/2003	9	Salem Communications Corporation	Alpharetta, GA	Fulton
WMLB	AM	1690	C	Variety	Atlanta, GA		10/08/2004	9	JW Broadcasting Inc	Avondale Estates, GA	De Kalb
WMAV	FM	90.7	NC	Relgn/Inspr	Atlanta, GA		07/02/2003	9	Life Radio Ministries	Griffin, GA	Spalding
WMAV	FM	91.7	NC	Relgn/Inspr	Atlanta, GA		05/14/2010	9	Life Radio Ministries	Peachtree City, GA	Fayette
WNEA	AM	1300	C	Christian	Atlanta, GA		07/02/2003	9	Word Christian Broadcasting	Newnan, GA	Coweta
WNIV	AM	970	C	Chrst/Talk	Atlanta, GA		07/02/2003	9	Salem Communications Corporation	Atlanta, GA	Fulton
WNINX	FM	100.5	C	Rock	Atlanta, GA		07/02/2003	9	Cumulus Media Holdings Inc	College Park, GA	Fulton
WNSY	FM	100.1	C	Mexican	Atlanta, GA		07/02/2003	9	Davis Broadcasting Inc	Talking Rock, GA	Pickens
WPBC	AM	1310	C	DARK	Atlanta, GA		07/02/2003	9	Hanni Broadcasting Inc	Decatur, GA	De Kalb
WPBS	AM	1040	C	Korean	Atlanta, GA		07/02/2003	9	PacificStar Media Corporation	Conyers, GA	Rockdale
WPLO	AM	610	C	Span/Oldies	Atlanta, GA		07/02/2003	9	Esquivel, Teresa	Grayson, GA	Gwinnett
WPZE	FM	102.5	C	Inspiration	Atlanta, GA		07/02/2003	9	Radio One Inc	Mableton, GA	Cobb
WQXI	AM	790	C	Sports	Atlanta, GA		07/02/2003	9	Lincoln Financial Media Company	Atlanta, GA	Fulton
WRAS	FM	88.5	NC	Variety	Atlanta, GA		07/02/2003	9	Georgia State University	Atlanta, GA	Fulton
WRDA	FM	105.7	C	Alternative	Atlanta, GA		07/02/2003	9	Clear Channel Communications Inc	Canton, GA	Cherokee
WRDG	FM	96.7	C	Alternative	Atlanta, GA		07/02/2003	9	Clear Channel Communications Inc	Peachtree City, GA	Fayette
WREK	FM	91.1	NC	Variety	Atlanta, GA		07/02/2003	9	Georgia Institute of Technology, Communications	Atlanta, GA	Fulton
WRFG	FM	89.3	NC	Variety	Atlanta, GA		07/02/2003	9	Radio Free Georgia Broadcasting Foundation	Atlanta, GA	Fulton
WSB	AM	750	C	News/Talk	Atlanta, GA		07/02/2003	9	Cox Media Group	Atlanta, GA	Fulton
WSB	FM	98.5	C	AC	Atlanta, GA		07/02/2003	9	Cox Media Group	Atlanta, GA	Fulton
WSBB	FM	95.5	C	News/Talk	Atlanta, GA		07/02/2003	9	Cox Media Group	Doraville, GA	De Kalb
WSRV	FM	97.1	C	Cisc Hits	Atlanta, GA		07/02/2003	9	Cox Media Group	Gainesville, GA	Hall
WSTR	FM	94.1	C	Top 40	Atlanta, GA		07/02/2003	9	Lincoln Financial Media Company	Smyrna, GA	Cobb
WTJH	AM	1260	C	DARK	Atlanta, GA		07/02/2003	9	Willis Broadcasting Corporation	East Point, GA	Fulton

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

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Atlanta, GA

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market		Owner	City & State of License	County of License
							Designn	Home Mkt			
							Date	Rank			
WTSH	FM	107.1	C	Country	Atlanta, GA		07/02/2003	9	Woman's World Broadcasting Inc	Aragon, GA	Polk
WTZA	AM	1010	C	R&B Oldies	Atlanta, GA		07/02/2003	9	Rivers Radio Group	Atlanta, GA	Fulton
WUJBL	FM	94.9	C	Country	Atlanta, GA		07/02/2003	9	Clear Channel Communications Inc	Atlanta, GA	Fulton
WUMJ	FM	97.5	C	Urban AC	Atlanta, GA		07/02/2003	9	Radio One Inc	Fayetteville, GA	Fayette
WJWG	FM	90.7	NC	CHR	Atlanta, GA		07/02/2003	9	Georgia Public Telecommunications Commission	Carrollton, GA	Carroll
WVEE	FM	103.3	C	Urban	Atlanta, GA		07/02/2003	9	CBS Radio	Atlanta, GA	Fulton
WVFJ	FM	93.3	C	ChrsContem	Atlanta, GA		07/02/2003	9	Radio Training Network Inc	Manchester, GA	Mentwether
WWEV	FM	91.5	NC	ChrsContem	Atlanta, GA		07/02/2003	9	War Hill Christian Fellowship Inc	Cumming, GA	Forsyth
WWPW	FM	96.1	C	Top 40	Atlanta, GA		07/02/2003	9	Clear Channel Communications Inc	Atlanta, GA	Fulton
WWWE	AM	1100	C	Sports	Atlanta, GA		07/02/2003	9	Beasley Broadcast Group	Hapeville, GA	Carroll
WWWQ	FM	99.7	C	CHR	Atlanta, GA		07/02/2003	9	Cumulus Media Holdings Inc	Atlanta, GA	Fulton
WXEM	AM	1460	C	Mexican	Atlanta, GA		07/02/2003	9	La Favorita Inc	Buford, GA	Gwinnett
WXJO	AM	1120	C	Oldies/Vary	Atlanta, GA		07/03/2006	9	Monte Sinai Inc	Douglasville, GA	Douglas
WYAY	FM	106.7	C	News	Atlanta, GA		07/02/2003	9	Cumulus Media Holdings Inc	Gainesville, GA	Hall
WYFW	FM	89.5	NC	Chrs/Talk	Atlanta, GA		07/02/2003	9	Bible Broadcasting Network Inc	Winder, GA	Barrow
WYXC	AM	1270	C	Nws/Trk/Spt	Atlanta, GA		07/02/2003	9	Clarion Communications Inc	Cartersville, GA	Bartow
WYZ	AM	1490	C	Variety	Atlanta, GA		07/02/2003	9	p KRMA Media Group LLC	Jasper, GA	Pickens
WYZE	AM	1480	C	Gospel	Atlanta, GA		07/02/2003	9	GHB Broadcasting	Atlanta, GA	Fulton
WZGC	FM	92.9	C	Sports	Atlanta, GA		07/02/2003	9	CBS Radio	Atlanta, GA	Fulton

Number of Stations in Geographic Market 87

Previous Stations in Geographic Market

WNGA	FM	105.1	C	DARK			08/03/2005	0	Georgia-Carolina Radiocasting Co LLC	Clermont, GA	Hall
------	----	-------	---	------	--	--	------------	---	--------------------------------------	--------------	------

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

"p" indicates pending sale to owner listed