

Multiple Ownership Statement

This assignment application is one of five related assignment applications seeking FCC approval for assignment of licenses of seven full-power radio stations from various licensees to Long Point Communications, LLC.¹ The stations and present licensees are as follows:

Auburn Broadcasting, Inc.

WAUB(AM), Auburn, New York, Facility Id. No. 43791

WLLW(FM), Seneca Falls, New York, Facility Id. No. 5392

The Fingerlakes Radio Group, Inc.

WFLR(AM), Dundee, New York, Facility Id. No. 36407

WCGR(AM), Canandaigua, New York, Facility Id. No. 8504

RSK Communications, Inc.

WFLK(FM), Geneva, New York, Facility Id. No. 40804

Geneva Broadcasting, Inc.

WGVA(AM), Geneva, New York, Facility Id. No. 36290

Lake Country Broadcasting, Inc.

WNYR-FM, Waterloo, New York, Facility Id. No. 36288

Four of the stations (WCGR, WGVA, WFLK and WNYR) are located in a rated market (Rochester, New York). Compliance with the Commission's media ownership rules therefore is demonstrated as determined by BIA and the contour overlap methodology.

The attached BIA study shows that there are 50 full-power radio stations in the Rochester, New York market. Section 73.3555(a)(1)(i) allows a single person or entity to hold an attributable interest in up to 8 commercial radio stations and not more than 5 commercial stations in the same service. Upon consummation of the proposed transactions, Long Point Communications will hold an attributable interest in 4 radio stations, two in the same service. The proposed transaction therefore complies with the Commission's media ownership rules with regard to the rated market.

The enclosed engineering statement of Robert M. Smith² shows the overlapping contours of the seven radio stations for purposes of the contour methodology. The overlapping contours

¹ The assignment applications also seek FCC approval for assignment of licenses of 5 FM translator stations. For purposes of this multiple ownership statement, the FM translator stations are not considered.

² The size of the radio markets defined in Mr. Smith's engineering statement may be larger, but for purposes of the this multiple ownership statement only the minimum number of radio stations necessary to demonstrate compliance with Section 73.3555 are shown.

create three relevant markets. The first market is defined by the overlapping contours of WLLW(FM), WFLK(FM), WGVA(AM) and WNYR-FM. The second market is defined by the overlapping contours of WAUB(AM), WLLW(FM) and WNYR-FM. The third market is defined by the overlapping contours of WGVA(AM) and WCGR(AM). As Mr. Smith's engineering statement shows there are at least: (1) 10 radio stations in the first market, including the 4 affiliated stations; (2) 7 radio stations in the second market, including the 3 affiliated radio stations; and (3) 5 radio stations in the third market, including the 2 affiliated radio stations.

Section 73.3555(a)(1)(iv) allows a single person or entity to hold an attributable interest in up to 5 radio stations in a market with 14 or fewer radio stations, provided that no more than 3 radio stations are in the same service. A single person or entity cannot hold an attributable interest in more than 50% of the full power commercial and noncommercial radio stations in the market unless the combination of stations comprises not more than one AM and one FM station.

In the first market, Long Point Communications will hold an attributable interest in 4 radio stations, 3 in the same service. In the second market, Long Point Communications will hold an attributable interest in 3 radio stations, 2 in the same service. In the third market Long Point Communications will hold an attributable interest in 2 radio stations, 2 in the same service. In none of the markets will Long Point Communications hold an attributable interest in more than 50% of the full power commercial and noncommercial radio stations. The proposed assignment therefore complies with the Commission's rules for all three markets.