

RADIO MARKET ANALYSIS
COMMONWEALTH BROADCASTING, LLC
WUSH (FM) RADIO STATION
POQUOSON, VIRGINIA
January 2008

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Commonwealth Broadcasting, LLC ("CBL"), licensee of station WUSH, Channel 291A, Poquoson, Virginia.¹ CBL is submitting an amendment to a pending modification of construction permit application for WUSH. As such, An updated radio market analysis is necessary. WUSH is licensed to a community located in a metro county in the Norfolk-Virginia Beach-Newport News, Virginia Arbitron Market (Market #40). Principals of CBL have an attributable interest in WNIS, 790 kHz, and WTAR, 850 kHz, Norfolk, Virginia; WPYA, Channel 229C1, Chesapeake, Virginia; and WROX-FM, Channel 241B Exmore, Virginia. WNIS, WTAR, and WPYA are also licensed to communities in metro counties located in the Norfolk-Virginia Beach-Newport News, Virginia Arbitron Market. WROX-FM is designated "home" to the Norfolk-Virginia Beach-Newport News, Virginia market. As such, a hybrid analysis for both rated and non-rated markets is needed.

ARBITRON/BIA MARKET REVIEW

2. As shown on Exhibit #1, there are forty-six AM and FM (commercial and non-commercial) stations listed in the Norfolk-Virginia Beach-Newport News, Virginia Arbitron Market. CBL would be in control of three FM stations and two AM stations in the market. The

1) There is also an outstanding permit to upgrade WUSH to Channel 291B1 at Poquoson, Virginia.

number of stations indicated falls in the 45 or more stations tier of §73.3555(a)(1)(I) of the Commission's rules. At this level, common ownership or control of up to eight stations, with no more than five in the same service, is permissible. Therefore, control of WUSH, along with the four other stations, in the Norfolk-Virginia Beach-Newport News, Virginia market is believed to be in compliance with the Commission's radio ownership rules for rated markets.

REVISED CONTOUR OVERLAP ANALYSIS

3. Since WROX-FM is considered "home" to the Arbitron market, and this facility has contour overlap with the other two FM stations, as well as the AM stations, a revised contour overlap analysis must also be conducted. Attached as Exhibit #2 is map showing the 70 dBu (3.16 mV/m) contours of the FM stations and the 5.0 mV/m contours of the AM stations. As a result of the overlap, a single distinct radio market is created. The city grade contours of the five stations will be considered the Radio Market Boundary and will be used to determine the number of other contributing stations in the market. No stations with transmitters located more than 92.0 kilometers from the boundary of the common overlap of subject stations will be considered; nor will any CBL station be considered as a contributing station, unless it is a subject station in the market under review.

4. Exhibit #3 is a depiction of the AM and FM stations (commercial and non-commercial) providing service to the defined Radio Market, a total of twelve are shown, including the five subject stations. Exhibit #4 is a tabulation of the stations in the Radio Market.

The number of stations depicted falls in the 14 or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules.² At this level, common ownership or control of up to five stations, with no more than three in the same service, provided the number of stations to be commonly held does not exceed 50% of the stations in the market, is permissible. Based on this number of facilities and on the contour overlap rules, it has been herein demonstrated that the Radio Market is in compliance.

5. As a result of the compliance shown above, in both rated and non-rated markets, the amendment to the minor change application for WUSH is in compliance with the Commission's rules.

6. The foregoing technical statement was prepared on behalf of Commonwealth Broadcasting, LLC, by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.2. BIA database. All other data was extracted from the CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

2) There are other stations providing service to the market; however, the ones indicated were sufficient to demonstrate compliance based on the number of stations to be commonly held.



FCC Geographic Market Definition for Norfolk-Virginia

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WJCD	FM	107.7	C	Smooth	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	p Clear Channel	Windsor, VA	Isle of Wight
WVXX	AM	1050	C	Span/Varty	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Davidson Media Group LLC	Norfolk, VA	Norfolk (City)
WXMM	FM	100.5	C	Rock	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Max Media LLC	Norfolk, VA	Norfolk (City)
WCPK	AM	1600	C	Black Gospl	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Willis Broadcasting Corporation	Chesapeake, VA	Chesapeake City (City)
WXGM	AM	1420	C	Adlt Stndrd	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	WXGM Inc	Gloucester, VA	Gloucester
WVBW	FM	92.9	C	Clsc Hits	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Max Media LLC	Suffolk, VA	Suffolk (City)
WXEZ	FM	94.1	C	Inspr/Gospl	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Max Media LLC	Yorktown, VA	York
WVKL	FM	95.7	C	Urban AC	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Entercom	Norfolk, VA	Norfolk (City)
WUFH	FM	106.1	C	Country	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Sinclair Telecable Inc	Poquoson, VA	Poquoson
WTAR	AM	850	C	Talk	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Sinclair Telecable Inc	Norfolk, VA	Norfolk (City)
WJOI	AM	1230	C	Adlt Stndrd	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Saga Communications Inc	Norfolk, VA	Norfolk (City)
WNOR	FM	98.7	C	AOR	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Saga Communications Inc	Norfolk, VA	Norfolk (City)
WPTE	FM	94.9	C	Modern AC	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Entercom	Virginia Beach, VA	Virginia Beach (City)
WGH	AM	1310	C	Sports	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Max Media LLC	Newport News, VA	Newport News (City)
WGH	FM	97.3	C	Country	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Max Media LLC	Newport News, VA	Newport News (City)
WNVZ	FM	104.5	C	CHR/UrCtp	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Entercom	Norfolk, VA	Norfolk (City)
WCDG	FM	92.1	C	Christmas	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	p Clear Channel	Moyock, NC	Currituck
WOWI	FM	102.9	C	Urban	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	p Clear Channel	Norfolk, VA	Norfolk (City)
WPCE	AM	1400	C	Black Gospl	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Willis Family Broadcasting	Portsmouth, VA	Portsmouth (City)
WXTG	AM	1490	C	Sports	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Red Zebra Broadcasting	Hampton, VA	Hampton (City)
WMBG	AM	740	C	Clsc Hits	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Granger, Gregory	Williamsburg, VA	York
WGPL	AM	1350	C	Black Gospl	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Willis Family Broadcasting	Portsmouth, VA	Portsmouth (City)
WNIS	AM	790	C	News/Talk	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Sinclair Telecable Inc	Norfolk, VA	Norfolk (City)
WAFX	FM	106.9	C	Clsc Rock	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Saga Communications Inc	Suffolk, VA	Suffolk (City)
WTJZ	AM	1270	C	Gospel	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Chesapeake-Portsmouth Broadcasting	Newport News, VA	Newport News (City)
WVAB	AM	1550	C	Gospel	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	p Birach Broadcasting Corporation	Virginia Beach, VA	Virginia Beach (City)
WWDE	FM	101.3	C	AC	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Entercom	Hampton, VA	Hampton (City)
WROX	FM	96.1	C	Modern	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Sinclair Telecable Inc	Exmore, VA	Northampton
WYFI	FM	99.7	NC	Christian	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Bible Broadcasting Network	Norfolk, VA	Norfolk (City)
WYRM	AM	1110	C	Chrst/Talk	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Word Broadcasting	Norfolk, VA	Norfolk (City)
WBQK	FM	107.9	C	Classical	Norfolk-Virginia Beach-Newport News,	01/24/2007	41	Davis Media LLC	West Point, VA	King William
WKUS	FM	105.3	C	Urban AC	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	p Clear Channel	Norfolk, VA	Norfolk (City)
WXGM	FM	99.1	C	AC	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	WXGM Inc	Gloucester, VA	Gloucester

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

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Norfolk-Virginia

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market		Owner	City & State of License	County of License
							Designtn	Home Mkt			
							Date	Rank			
WPYA	FM	93.7	C	Adult Hits	Norfolk-Virginia Beach-Newport News,	Norfolk-Virginia Beach-Newport News,	05/11/2004	41	Sinclair Telecable Inc	Chesapeake, VA	Chesapeake City (City)
WRJR	AM	1010	C	Span/Chrst	Norfolk-Virginia Beach-Newport News,	Norfolk-Virginia Beach-Newport News,	08/07/2003	41	ABC/Disney	Portsmouth, VA	Portsmouth (City)
WHKT	AM	1650	C	Family Hits	Norfolk-Virginia Beach-Newport News,	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	ABC/Disney	Portsmouth, VA	Portsmouth (City)
WCWM	FM	90.9	NC	Variety	Norfolk-Virginia Beach-Newport News,	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	College of William & Mary	Williamsburg, VA	Williamsburg (City)
WFOS	FM	88.7	NC	Cls/BBd/Old	Norfolk-Virginia Beach-Newport News,	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Chesapeake Public Schools	Chesapeake, VA	Chesapeake (City)
WHOV	FM	88.1	NC	Variety	Norfolk-Virginia Beach-Newport News,	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Hampton University	Hampton, VA	Hampton (City)
WHRO	FM	90.3	NC	Classical	Norfolk-Virginia Beach-Newport News,	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Hampton Roads Educational Telecomm	Norfolk, VA	Norfolk (City)
WHRV	FM	89.5	NC	Nws/Tlk/Inf	Norfolk-Virginia Beach-Newport News,	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Hampton Roads Educational Telecomm	Norfolk, VA	Norfolk (City)
WXTG	FM	102.1	C	Sports	Norfolk-Virginia Beach-Newport News,	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Red Zebra Broadcasting	Virginia Beach, VA	Virginia Beach (City)
WNSB	FM	91.1	NC	Urban	Norfolk-Virginia Beach-Newport News,	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Norfolk State University	Norfolk, VA	Norfolk (City)
WJLZ	FM	88.5	NC	Christian	Norfolk-Virginia Beach-Newport News,	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Virginia Beach Educational Broadcasting	Virginia Beach, VA	Virginia Beach (City)
WYCS	FM	91.5	NC	Gospel	Norfolk-Virginia Beach-Newport News,	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	Creative Educational Media Corp Inc	Yorktown, VA	York
WBVA	AM	1450	C	ChrsContem	Norfolk-Virginia Beach-Newport News,	Norfolk-Virginia Beach-Newport News,	07/02/2003	41	p Birach Broadcasting Corporation	Bayside, VA	Virginia Beach (City)

Number of Stations in Geographic Market 46

Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed

Graham Brock, Inc. - Broadcast Technical Consultants

WUSH Proposed

Latitude: 36-51-39 N
Longitude: 076-21-13 W
ERP: 11.00 kW
Channel: 291B1
Frequency: 106.1 MHz

WPYA

BLH-20031015ADL
Latitude: 36-32-55 N
Longitude: 076-11-16 W
ERP: 100.00 kW
Channel: 229C1
Frequency: 93.7 MHz

WROX-FM

BLH-20040317ABS
Latitude: 37-15-45 N
Longitude: 076-00-45 W
ERP: 23.00 kW
Channel: 241B
Frequency: 96.1 MHz

WNIS

Latitude: 37-04-25 N
Longitude: 076-17-31 W
ERP: 5.00 kW
Frequency: 790.0 kHz

WTAR

Latitude: 37-03-36 N
Longitude: 076-41-26 W
ERP: 50.00 kW
Frequency: 850.0 kHz

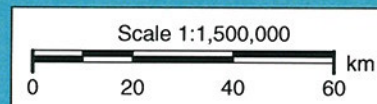
WROX-FM 3.16 mV/m

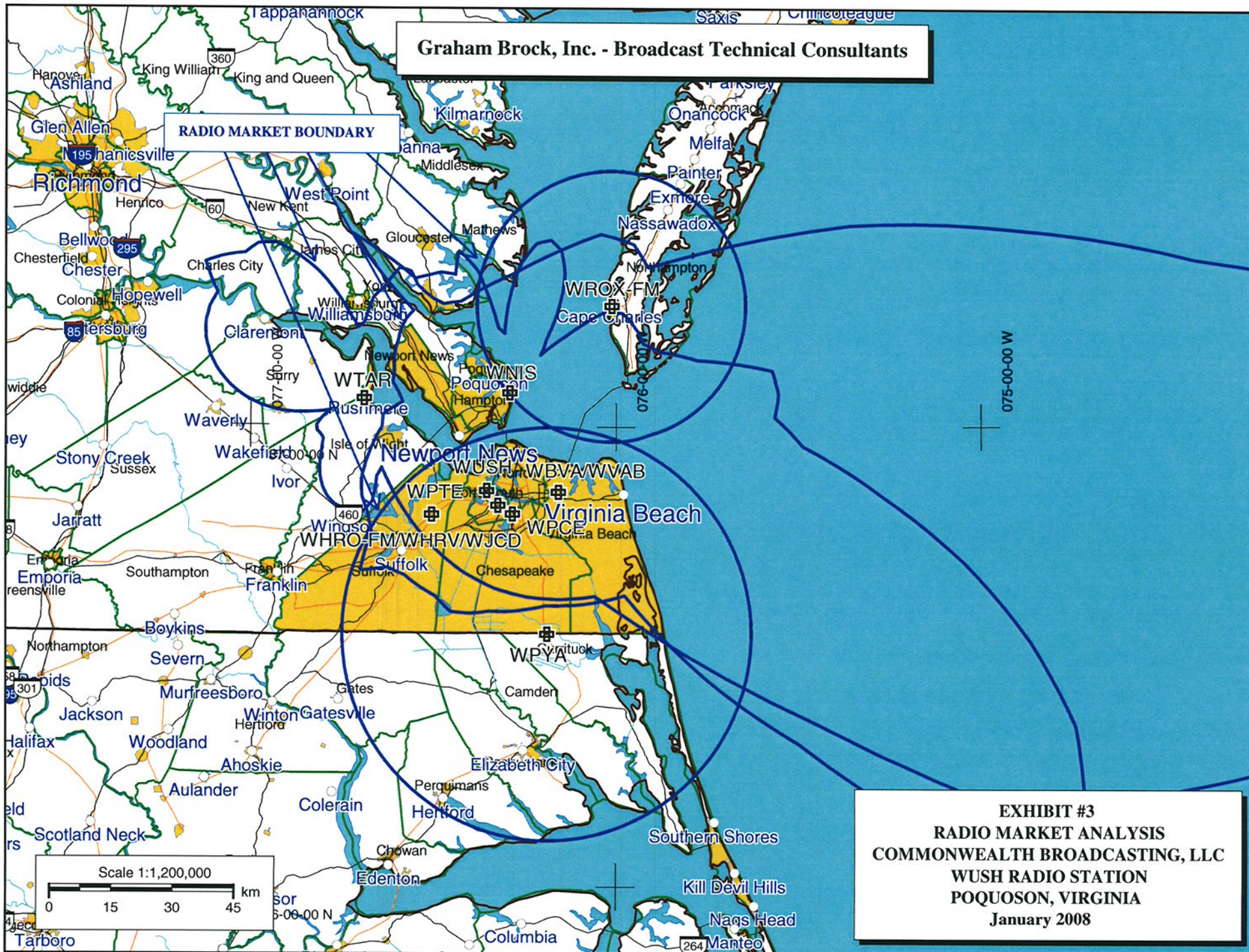
WTAR 5.0 mV/m

WNIS 5.0 mV/m

WPYA 3.16 mV/m

EXHIBIT #2
RADIO MARKET ANALYSIS
COMMONWEALTH BROADCASTING, LLC
WUSH RADIO STATION
POQUOSON, VIRGINIA
January 2008





RADIO MARKET ANALYSIS
COMMONWEALTH BROADCASTING, LLC
WUSH (FM) RADIO STATION
POQUOSON, VIRGINIA
January 2008

EXHIBIT #4

Tabulation of Stations in Radio Market

AM Stations

* WNIS	790 kHz	Norfolk, Virginia
* WTAR	850 kHz	Norfolk, Virginia
WPCE	1400 kHz	Portsmouth, Virginia
WBVA	1450 kHz	Bayside, Virginia
WVAB	1550 kHz	Virginia Beach, Virginia

Total AM Stations - 5

FM Stations

WHRV	Ch 208B	Norfolk, Virginia
WHRO-FM	Ch 212B	Norfolk, Virginia
* WPYA	Ch 229C1	Chesapeake, Virginia
WPTE	Ch 235B	Virginia Beach, Virginia
* WROX-FM	Ch 241B	Exmore, Virginia
* WUSH	Ch 291B1	Poquoson, Virginia
WJCD	Ch 299A	Windsor, Virginia

Total FM Stations - 7

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 12

* Subject station.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT


State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Commonwealth Broadcasting, LLC to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.


The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 14th day of January 2008.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 14th day of January 2008*



Notary Public, State of Georgia
My Commission Expires: March 18, 2011