

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS

DAVIS BROADCASTING, INC. OF COLUMBUS

This radio multiple ownership analysis was prepared on behalf of Davis Broadcasting, Inc. of Columbus, (herein "Davis"). Davis proposes to modify the construction permit for radio station WIOL(FM) at Waverly Hall, Georgia.\* A review of the stations that Davis or its affiliates have interest was completed. Therefore, the following stations are considered under proposed ownership or control:

Call Sign / Facility ID	Location	Facilities
WIOL/50534 <i>BPH-20060501ANO (amended)</i>	Waverly Hall, GA	CH 239A 2.9 kW 145 m
WFXE(FM) <i>BMLH-19900409KJ</i>	Columbus, GA	CH 285A 6 kW 88 M
WKZJ(FM)/36307 <i>BLH-20001103AAC</i>	Eufaula, AL	CH 224C2 39 kW 168 M
WEAM-FM/89045 <i>BLH-20030514ACF</i>	Buena Vista, GA	CH 264A 2.6 kW 153 M
WOKS(AM) /15846 <i>Licensed Facility</i>	Columbus, GA	1340 kHz 1 kW-U ND-1
WEAM(AM)/47088 <i>BL-19890525AC</i>	Columbus, GA	1580 kHz 2.3 kW-D 1 kW-N DA-N

The principal community contours of the stations are depicted on a map included herein as Figure 1. Since some of these stations have overlapping principal community contours (3.16 mV/m for FM stations), an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

\* See WIOL(FM) application for construction permit, FCC File Number: BPH-20060501ANO.

Radio Market

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned.<sup>†</sup> There are two new “radio markets” defined for analysis under the Commission’s Rules. The table below lists the defined markets:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	--	WEAM-FM, WIOL (Proposed)
Market 2	WOKS(AM)	WFXE(FM), WIOL (Proposed)

Count of Stations in Defined Market

The number of other radio stations in a “radio market” is determined by counting the operating stations having principal community contours that intersect the principal community contours which define the radio market. Only those stations located within 92 kilometers of the perimeter of the mutual overlap area of the respective defined market area were employed in the count of the stations. The results of the analysis are tabulated below:

Defined Radio Market	Minimum Number of Stations in Radio Market
Markets 1 & 2	4 AM, 5 FM; 9 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio market tabulated above. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission’s AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 10 degrees of azimuth.

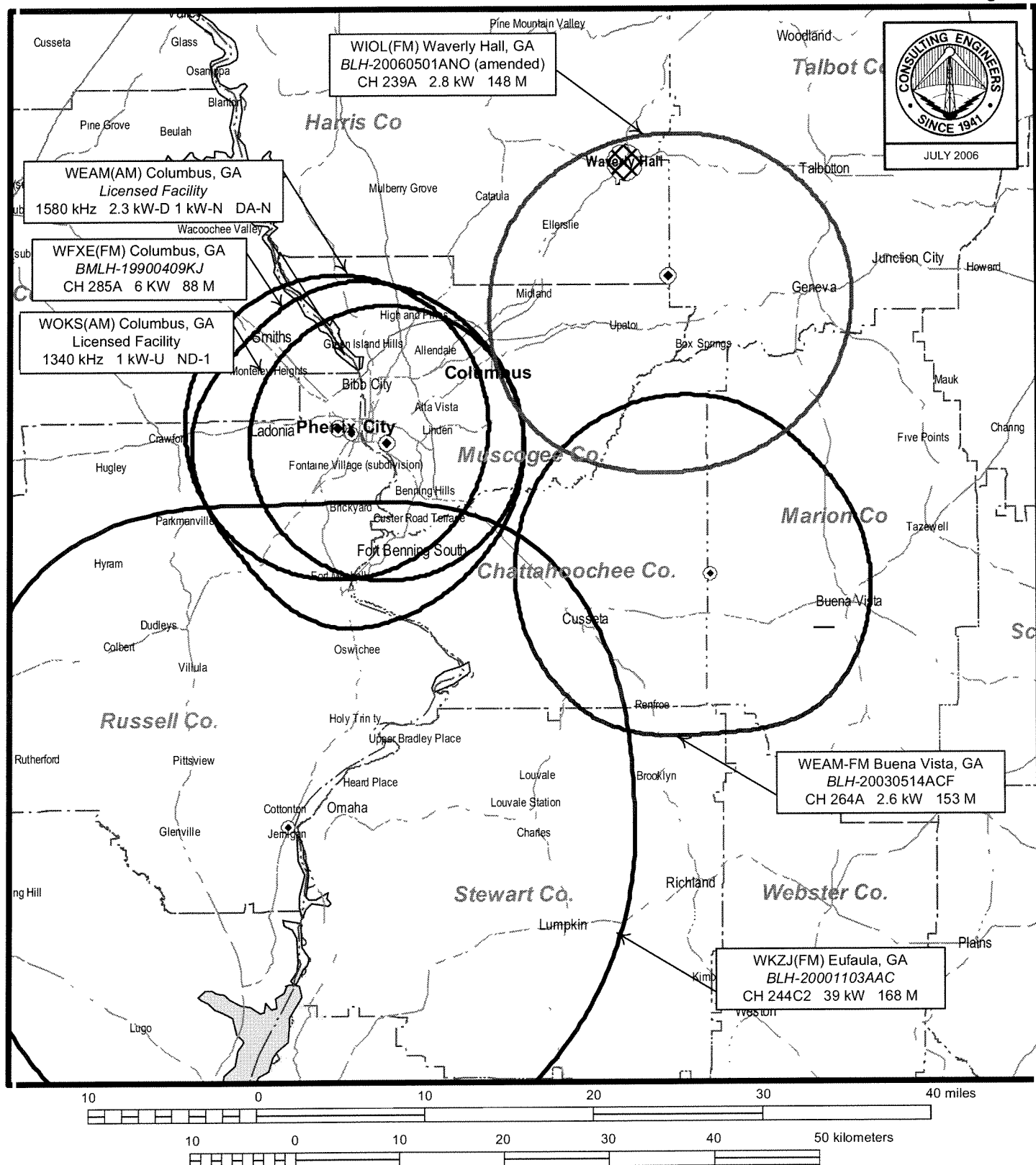
<sup>†</sup> See Order in Implementation of Section 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

Based on the above, it is concluded that the applicant will not own more than 50% of the stations in the new markets, and therefore the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules using the interim contour method.

Charles A. Cooper

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Ave.  
Sarasota, Florida 34237  
(941)329-6000

August 17, 2006



## PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

DAVIS BROADCASTING, INC. OF COLUMBUS

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Tabulation of Other Stations Defined in Radio Markets 1 & 2

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
WDAK	Columbus	GA	540
WSHE	Columbus	GA	1270
WRCG	Columbus	GA	1420
WHAL	Phoenix City/Columbus	AL	1460
WFRC	Columbus	GA	90.5
WKCNC	Lumpkin	GA	99.3
WGSY	Phoenix City	AL	100.1
WVRK	Columbus	GA	102.9
WCGQ	Columbus	GA	107.3