

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877



DUOPOLY COMPLIANCE CERTIFICATION

Acquisition of 3 Radio Stations by Laurel Media, Inc. Non-Rated Market: Warren-Clarendon, PA February 2017

Licensee Certifies the Following

*Laurel Media, Inc., (“LMI”), currently owns 3 radio station (2 FM & 1 AM) at St. Marys, PA. It is now requesting authority to acquire 3 additional radio stations (2 FM & 1 AM) located some 65 km Northwest from St. Marys, PA. Only one of Laurel’s existing stations (WDDH FM) will create a duopoly overlap with these three stations to be acquired, creating a new duopoly overlap of 4 stations (3 FM & 1 AM). None of these stations are “home” to an Arbitron Radio Market. Using the contour overlap method of analysis, it was determined that these 4 stations create a single unique duopoly market and that market is served by a total of **33 radio stations** (including the 4 proposed for common ownership). Section 73.3555 indicates that ownership of 4 overlapping radio stations (3 FM & 1 AM) only requires the duopoly market to include **at least 8 stations** (including the 4 proposed for common ownership). Based upon this, **LMI herein certifies that its proposed ownership of these 3 additional stations is in full compliance with the FCC’s Radio Duopoly Rules.** Upon approval, LMI will own a total of 6 stations with two distinct duopoly radio markets, consisting of an existing 3 station duopoly made up of 2 FM & 1 AM and an additional new 4 station duopoly made up of 3 FM & 1 AM.*

Analysis of Compliance

The following figures are provided as documentation of compliance:

Figure A is a map showing the city grade contour of the 2 *FM* & 1 *AM* radio stations **currently owned** by LMI and of the 2 *FM* & 1 *AM* radio stations it proposes to acquire. **Figure A1** is a two page tabulation giving the technical details provided in CDBS on all 6 stations.

Figure B is a map showing that **29 other non-commonly owned** radio stations provide city grade service to this unique radio duopoly market, all of which are within 92 km of the common concentration of the 4 stations proposed to be commonly owned. Based upon this, it is herein certified that **33 stations** (including the 4 common) comprise this new radio duopoly market. **Figure B1** is a list of all stations making up this radio duopoly market.

All facts contained herein are true of my own knowledge, except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.



John J. Mullaney, Consulting Engineer
Executed on the 8th day of February 2017.

FIGURE A
MAP SHOWING COMMON STATIONS

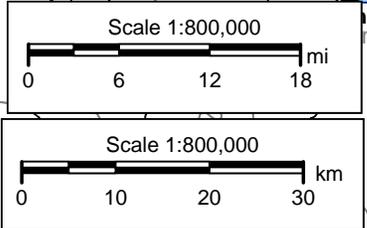
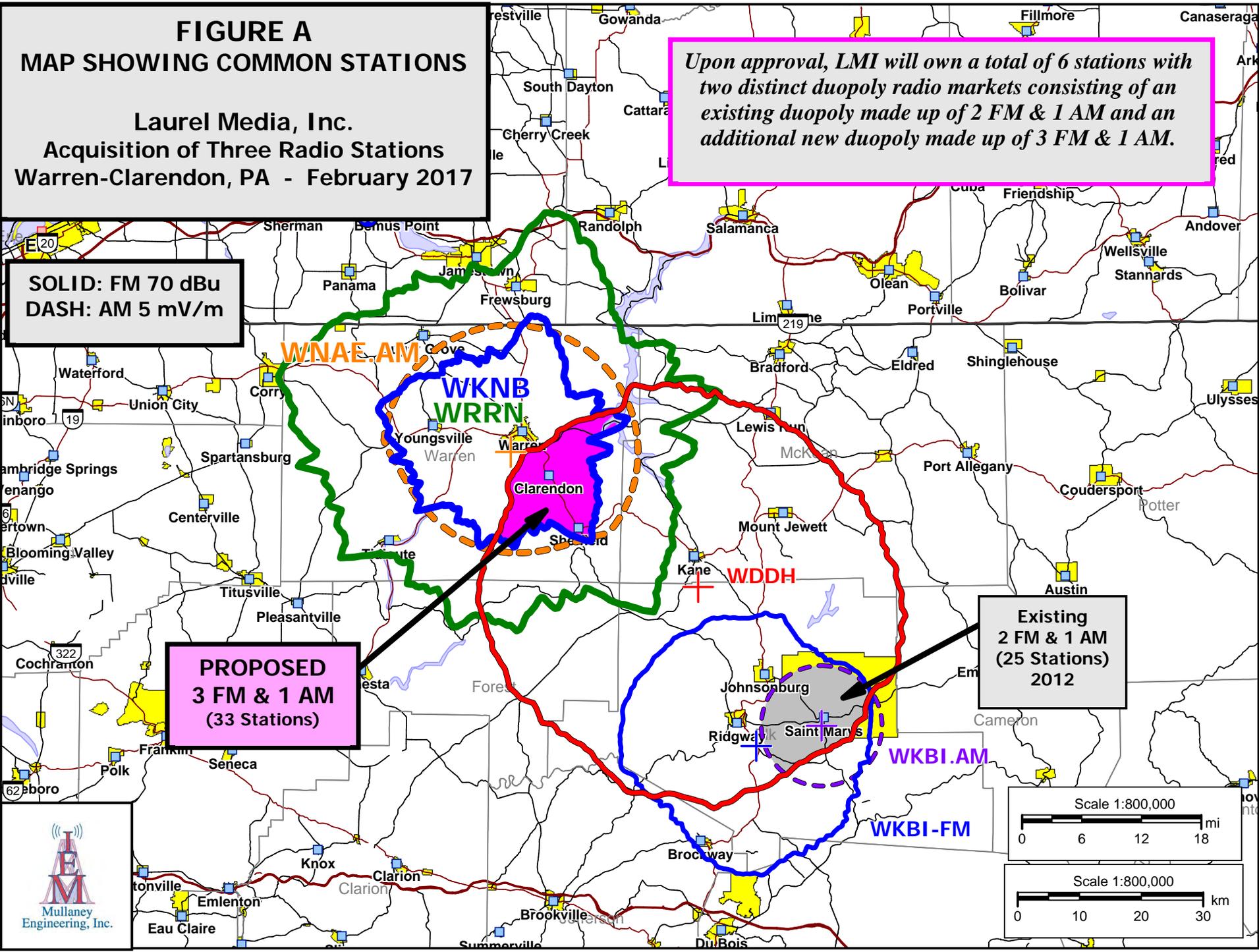
Laurel Media, Inc.
Acquisition of Three Radio Stations
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Upon approval, LMI will own a total of 6 stations with two distinct duopoly radio markets consisting of an existing duopoly made up of 2 FM & 1 AM and an additional new duopoly made up of 3 FM & 1 AM.

SOLID: FM 70 dBu
DASH: AM 5 mV/m

PROPOSED
3 FM & 1 AM
(33 Stations)

Existing
2 FM & 1 AM
(25 Stations)
2012



Current Owner

<u>Call Sign</u>	<u>Stat / Intl St</u>	<u>Country / State / City</u>			<u>File Number</u>			<u>Assoc ID</u>
<u>Freq</u>	<u>Service</u>	<u>Chan - Class - Intl</u>	<u>Border-Dist</u>	<u>Current/Archive</u>	<u>Docket</u>	<u>73 215</u>	<u>Last Update</u>	
<u>Owner</u>								
<u>Antenna ID</u>	<u>DA</u>	<u>Make / Model / Bays / Spacing</u>			<u>FRN</u>	<u>Facility ID</u>	<u>Fac. Status - Date</u>	
<u>Latitude</u>		<u>Longitude</u>	<u>Orientation</u>	<u>ASRN</u>	<u>Tip AG</u>	<u>Application ID</u>	<u>App Status - Date</u>	
<u>H / V :</u>	<u>ERP</u>	<u>ERP Max</u>	<u>HAAT</u>	<u>AMSL</u>		<u>AGL</u>	<u>Max HAAT</u>	

WDDH (wpkk) LIC OPER US PA ST. MARYS BLH 19950314KB
 97.5 MHz FM 248 B B C 126.0 C N 7/25/2014
 LAUREL MEDIA, INC. **OVERLAPS PROPOSED ACQUISITION**
 N - / - / - / - **0010370757** 6683 LICEN -
 N 41° 37' 04.0" W 78° 48' 14.0" 183.00 **207307** GRANT - 7/13/1995
 NAD-83: 41° 37' 04.2" 78° 48' 13.1"
 H/V: 19.5(kW) 244.0 m / 800 ft 810.0 m / 2,657 ft 174.0 m / 571 ft 295.0 m / 968 ft

WKBI-FM LIC OPER US PA ST. MARYS BLH 19960925KE
 93.9 MHz FM 230 B1 B1 C 153.0 C Y 7/25/2014
 LAUREL MEDIA, INC.
 N - / - / - / - **0006335525** 65604 LICEN -
 N 41° 23' 11.0" W 78° 41' 32.0" 123.00 **232731** GRANT - 6/23/1997
 NAD-83: 41° 23' 11.2" 78° 41' 31.1"
 H/V: 2.35(kW) 244.0 m / 800 ft 787.0 m / 2,582 ft 116.0 m / 381 ft 302.0 m / 991 ft

WKNB LIC OPER US PA CLARENDON BLH 19970112KA
 104.3 MHz FM 282 A B1 C 93.0 C N 7/25/2014
 RADIO PARTNERS, LLC **PROPOSED ACQUISITION**
 N - / - / - / - **0004978763** 34929 LICEN -
 N 41° 48' 50.0" W 79° 10' 04.0" 68.00 **239030** GRANT - 7/31/1997
 NAD-83: 41° 48' 50.2" 79° 10' 03.2"
 H/V: 4.70(kW) 113.0 m / 371 ft 617.0 m / 2,024 ft 44.0 m / 144 ft 215.0 m / 705 ft

WRRN LIC OPER US PA WARREN BLH 19820127AE
 92.3 MHz FM 222 B B C 93.0 C N 7/28/2014
 RADIO PARTNERS, LLC **PROPOSED ACQUISITION**
 N - / - / - / - **0004978763** 34927 LICEN -
 N 41° 48' 50.0" W 79° 10' 04.0" **38445** GRANT - 12/22/1982
 NAD-83: 41° 48' 50.2" 79° 10' 03.2"
 H/V: 50.0(kW) 125.0 m / 410 ft 628.0 m / 2,060 ft 60.0 m / 197 ft 226.0 m / 741 ft

FIGURE A1 - COMMONLY OWNED STATIONS - FM

(Page 1 of 2)



**Acquisition of 3 Radio Stations by
 Laurel Media, Inc.**

NON-RATED MARKET: Warren-Clarendon, PA

February 2017

AM Search Results

3 Records Found (2 Facilities)

DB Updated: 2/6/2017

Current Owner

Call Sign	Status	Country / State / City	Last Update	File Number
Frequency	Hours	Mode Schedule Class - Region 2	C/A	Antenna System ID
Owner	Longitude	FRN	CutOff Date	Facility ID
Latitude	Theoretical RMS -mV/m	Q Factor	Application ID	Fac. Status /Date
Power	IFRB List /Date	#Tower	Pat-Type	#Augs
Status: Canadian / Mexican / Region 2	Change List # / Date			

WKBI LIC US PA ST. MARYS 7/25/2014
 1400kHz U ND1 U C C C 21056
 LAUREL MEDIA, INC.
 N 41° 24' 56.0" W 78° 33' 56.0" **0006335525** 65603 LICEN -
 1.00(kW) 358.9 @1 km 223.0 @1 mi 313637 GRANT -
 1 1 T 0 02044 05/19/1986
 NAD-83: 41° 24' 56.2" 78° 33' 55.1"
[View Towers](#)

WNAE LIC US PA WARREN 7/28/2014
 1310kHz D ND1 U D B C 17838
 RADIO PARTNERS, LLC
 N 41° 48' 50.0" W 79° 10' 04.0" **0003174232** 34928 LICEN -
 5.00(kW) 315.4 @1 km 196.0 @1 mi 312249 GRANT -
 1 1 T 0 02191 06/16/1988
 NAD-83: 41° 48' 50.2" 79° 10' 03.2"
[View Towers](#)

PROPOSED ACQUISITION

WNAE LIC US PA WARREN 7/28/2014
 1310kHz N ND1 U D B C 17840
 RADIO PARTNERS, LLC
 N 41° 48' 50.0" W 79° 10' 04.0" **0003174232** 34928 LICEN -
 0.094(kW) 315.4 @1 km 196.0 @1 mi 312249 GRANT -
 1 1 T 0 02191 06/16/1988
 NAD-83: 41° 48' 50.2" 79° 10' 03.2"
[View Towers](#)

FIGURE A1 - COMMONLY OWNED STATIONS - AM
 (Page 2 of 2)



**Acquisition of 3 Radio Stations by
 Laurel Media, Inc.**

NON-RATED MARKET: Warren-Clarendon, PA

February 2017

**FIGURE B
MAP SHOWING OTHER STATIONS
SERVING NEW DUOPOLY AREA**

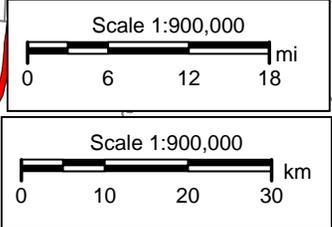
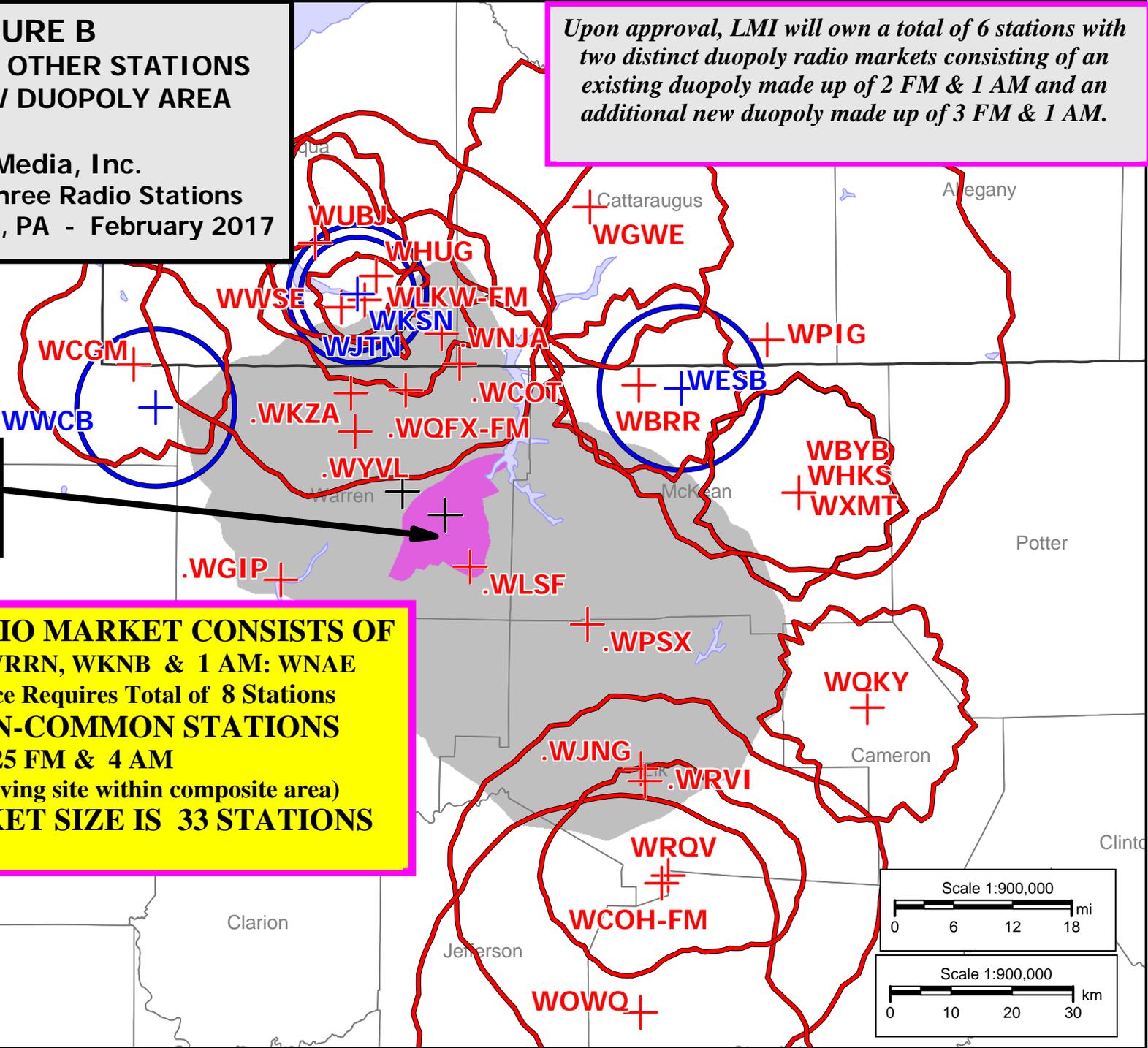
Upon approval, LMI will own a total of 6 stations with two distinct duopoly radio markets consisting of an existing duopoly made up of 2 FM & 1 AM and an additional new duopoly made up of 3 FM & 1 AM.

**Laurel Media, Inc.
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**FM 70 dBu
AM 5 mV/m**

**PROPOSED
3 FM & 1 AM
(34 Stations)**

**DUOPOLY RADIO MARKET CONSISTS OF
3 FM: WDDH, WRRN, WKNB & 1 AM: WNAE
FCC Compliance Requires Total of 8 Stations
OTHER NON-COMMON STATIONS
25 FM & 4 AM
(with 10 FMs having site within composite area)
TOTAL MARKET SIZE IS 33 STATIONS**



Total number of overlapping contours: 33

COMMONLY OWNED OVERLAPPING STATIONS

Distance and bearing calculations from 92 km reference: 41-46-45 N, 079-05-00 W

Callsign	Type	Chan City	St	File Number		Dist (km)	Azi (deg)
92 km ref						0.0	0.0
WRRN	FM	222B Warren	PA	BLH19820127AE	PROPOSED	8.0	298.8
WKNB	FM	282A Clarendon	PA	BLH19970112KA	PROPOSED	8.0	298.8
WNAE.AM	AM	1310 WARREN	PA	BL	PROPOSED	8.0	298.8
WDDH	FM	248B St. Marys	PA	BLH19950314KB	EXISTING	29.4	127.5

Overlapping Contours: 29 Non-Common Stations

Callsign	Type	Chan City	St	File Number		Dist (km)	Azi (deg)
10 TRANSMITTER SITE IS WITHIN DUOPOLY COMPOSITE CITY GRADE AREA							
.WNJA	FM	209B Jamestown	NY	BLED19910729KR		29.7	358.8
.WCOT	FM	215B Jamestown	NY	BLED20010529ABF		24.8	5.4
.WKZA	FM	295B1 Lakewood	NY	BLH20031117AAM		25.2	322.2
.WYVL	FM	203A Youngsville	PA	BLED20151202EYN		20.1	312.7
.WGIP	FM	206A Tidioute	PA	BLED20121214ABR		29.0	248.5
.WPSX	FM	211B Kane	PA	BLED19950313KB		29.4	127.5
.WRVI	FM	216A Ridgway	PA	BLED20140103ADV		52.5	142.4
.WJNG	FM	263A Johnsonburg	PA	BLH19980720KE		54.5	143.1
.WQFX-FM	FM	276A Russell	PA	BMLH20010727ABC		21.5	342.4
.WLSF	FM	286A Sheffield	PA	BMLH20161213ABZ		9.4	154.4

19 STATIONS PROVIDING CONTOUR OVERLAP TO COMPOSITE CITY GRADE AREA							
WUBJ	FM	201A Jamestown	NY	BLED20010308AAH		49.4	334.4
WWSE	FM	227B Jamestown	NY	BMLH20120411AAA		38.0	333.4
WLKW-FM	FM	237A Celoron	NY	BLH20111129DUV		37.6	339.4
WPIG	FM	239B Olean	NY	BLH4110		60.0	61.5
WHUG	FM	270A Jamestown	NY	BLH19970613KD		40.7	343.9
WGWE	FM	290B1 Little Valley	NY	BLH20100301ACS		55.7	25.2
WRQV	FM	201B1 Ridgway	PA	BLED20110914AAG		69.4	148.2
WHKS	FM	235A Port Allegany	PA	BMLH20020312AAF		58.1	86.4
WQKY	FM	255A Emporium	PA	BLH19960520KC		76.0	114.5
WBRR	FM	261A Bradford	PA	BMLH20110107AAF		38.2	56.1
WOWQ	FM	271B Du Bois	PA	BMLH20030609AFW		87.5	158.6
WCGM	FM	274A Wattsburg	PA	BLED20111011ADP		56.7	295.7
WBYB	FM	280A Eldred	PA	BLH20140225AAQ		58.1	86.4
WXMT	FM	292A Smethport	PA	BMLH20090202ACF		58.1	86.4
WCOH-FM	FM	297B Du Bois	PA	BLED20150715AAV		69.9	149.5
WESB	AM	1490 BRADFORD	PA	BL19890421AD		43.9	61.8
WWCB	AM	1370 CORRY	PA	BL		50.6	290.3
WJTN	AM	1240 JAMESTOWN	NY	BML20020823ABO		38.9	338.3
WKSN	AM	1340 JAMESTOWN	NY	BL20111101ALS		38.9	338.3

Duopoly Options:

FM: 3.16 mV/m (70 dBu); Include NCE AM: 5.0 mV/m
 Stations more than 92 km from the common area were excluded.

DUOPOLY MARKET CONSISTS OF 33 STATIONS

(3 FM + 1 AM Only Requires Market Consist of 8 Stations)

FIGURE B1 - OTHER STATIONS IN MARKET



**Acquisition of 3 Radio Stations by
 Laurel Media, Inc.**

NON-RATED MARKET: Warren-Clarendon, PA

February 2017