

**TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CLEAR CHANNEL BROADCAST LICENSES, INC.**

This statement and the attached figures were prepared on behalf of Clear Channel Broadcast Licenses, Inc ("CCBL"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCBL proposes to modify the facilities of WQNS(FM), Waynesville, North Carolina to Woodfin, North Carolina, and to change the station's antenna location. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership, time brokerage or joint sales:¹

TABLE 1: PROPOSED COMMONLY OWNED, BROKERED OR JOINTLY-SOLD STATIONS STUDIED AND ASSOCIATED ARBITRON METRO2 INFORMATION

Calls	Fac ID	Band	Community	County	Geographic Arbitron Market	Declared Arbitron Market
WKSF	2947	FM	Old Fort	McDowell	Non-Metro	Asheville, NC
WMXF	40979	AM	Waynesville	Haywood	Asheville, NC	Asheville, NC
WPEK	41565	AM	Fairview	Buncombe	Asheville, NC	Asheville, NC
WQNQ	71341	FM	Fletcher	Henderson	Non-Metro	Asheville, NC
WQNS-Prp	41008	FM	Waynesville to Woodfin	Haywood to Buncombe	Asheville, NC	Asheville, NC
WWNC	2946	AM	Asheville	Buncombe	Asheville, NC	Asheville, NC
WESC-FM	4679	FM	Greenville	Greenville	Greenville-Spartanburg, SC	Greenville-Spartanburg, SC
WMYI	59818	FM	Hendersonville	Henderson	Non-Metro	Greenville-Spartanburg, SC

Since certain of these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), or are located in, or home to, the same Arbitron Metro market, an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.³

CCC does not have an attributable interest in any other station with a principal community contour that overlaps or intersects the principal community contour of WQNS(FM), as proposed, which is not located in an Arbitron market, or regardless of contour overlap, which is located in the same Arbitron Metro⁴ as WQNS(FM). The community of license of WQNS(FM) is, and will continue to be, located within Asheville, NC Arbitron Metro. WQNS(FM) is reported by BIA as being "Home" to the Asheville, NC Metro. Contour overlap of the station to be modified, as depicted in *Figure 1*, also occurs with commonly-owned stations whose communities of license are located in the Greenville-Spartanburg, SC Arbitron Metro market, and commonly owned

¹ None of the following stations are attributable by virtue of a time brokerage agreement or joint sales agreement.

² Arbitron data presented herein is obtained from BIA's "Media Access Pro."

³ See 47 C.F.R. § 73.3555(a).

⁴ A station is considered to be "located in an Arbitron Metro" if the station's community of license is located within the boundaries of that Metro, or, the station is listed as "Home" to that Metro by BIA.

stations whose communities of license are located outside any Arbitron Metro market.

Arbitron Market Study

WQNS (FM) is reported by BIA as being "Home" to the Asheville, NC Metro. This proposal is in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by *Table 2* below:

**TABLE 2 - STATIONS CONSIDERED TO BE IN THE
ASHEVILLE, NC ARBITRON METRO⁵**

Count	Call	Band	Owner	Mkt Join Date
1	WLFA	FM	Asheville Educational Association Inc	02-Jul-03
2	WMIT	FM	Blue Ridge Broadcasting	02-Jul-03
3	WKSF	FM	Clear Channel Communications Inc	02-Jul-03
4	WMXF	AM	Clear Channel Communications Inc	02-Jul-03
5	WPEK	AM	Clear Channel Communications Inc	02-Jul-03
6	WQNQ	FM	Clear Channel Communications Inc	02-Jul-03
7	WQNS	FM	Clear Channel Communications Inc	02-Jul-03
8	WWNC	AM	Clear Channel Communications Inc	02-Jul-03
9	WZGM	AM	HRN Broadcasting Inc	02-Jul-03
10	WKJV	AM	International Baptist Outreach Mission	02-Jul-03
11	WFGW	AM	Martinez, Humberto & Toth, Margarita Del Rosario	02-Jul-03
12	WISE	AM	Saga Communications Inc	02-Jul-03
13	WOXL-FM	FM	Saga Communications Inc	02-Jul-03
14	WTMT	FM	Saga Communications Inc	21-Jun-07
15	WYSE	AM	Saga Communications Inc	02-Jul-03
16	WHBK	AM	Seay Broadcasting Inc	02-Jul-03
17	WPTL	AM	Skycountry Broadcasting Inc	02-Jul-03
18	WCQS	FM	Western North Carolina Public Radio	02-Jul-03
19	WYQS	FM	Western North Carolina Public Radio	02-Jul-03
20	WSKY	AM	Wilkins Communications Network Inc	17-Mar-04

Interim Contour-Overlap Analysis Required

Because one or more commonly-owned or attributable contour overlapping stations have a community of license which is located outside any Arbitron Metro, an interim contour-overlap analysis is also set forth in this statement.

⁵ Source: BIA.

Interim Contour-Based Radio Markets

A "radio market" under the interim contour-overlap method is the area encompassed by the mutually overlapping principal community contours of the stations under common-ownership or attribution. Here, such mutually overlapping contours form one "radio market" for interim contour-overlap analysis under the Commission's rules as shown below in *Table 3*.

TABLE 3, TABLE OF CONTOUR MARKET

Radio Market	
2-AM 5-FM	
WWNC	AM
WPEK	AM
WKSF	FM
WESC-FM	FM
WQNS- PRP	FM
WMYI	FM
WQNQ	FM

Count of Stations in Defined Market(s)

The number of radio stations in a contour-overlap "radio market" is determined by counting the operating stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject commonly owned or attributable stations, excluding any stations whose transmitter sites are further than 92 kilometers from the perimeter of mutual overlap, and excluding any commonly owned or attributable stations that do not serve to define the market. For simplicity of analysis only stations which overlap WQNS(FM) as proposed have been considered, as depicted in *Figure 2*.

In the interim contour-overlap "radio market" studied herein, there are the required count of radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure 3* is a tabulation of the radio stations identified in the contour-overlap "radio market", and *Table 4* is a summary of that data.

TABLE 4, TABLE OF MARKET STATION COUNT

Market 1	
Count	73

Only known licensed, operating radio stations were included in this tabulation. Distances to contours for AM stations 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 C.F.R. § 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 C.F.R. § 73.313.

Terrain data was derived from the N.G.D.C. 30 second computer database for each of the FM stations using radials spaced every 45 degrees of azimuth.

Conclusions

In the Arbitron Metro market studied herein, there are at least 20 radio stations, including the subject commonly-owned 3-AM / 3-FM stations, which are home to the Asheville, NC Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

In each interim contour-overlap "radio market" studied herein, there is at least the minimum required count, including the commonly-owned stations.

Based on the above, it is concluded that the proposed modification complies with Section 73.3555(a) of the FCC Rules.

Respectfully submitted,

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FCC Engineering Supervisor
August 7, 2012

Figure 2- Map of Market Contours

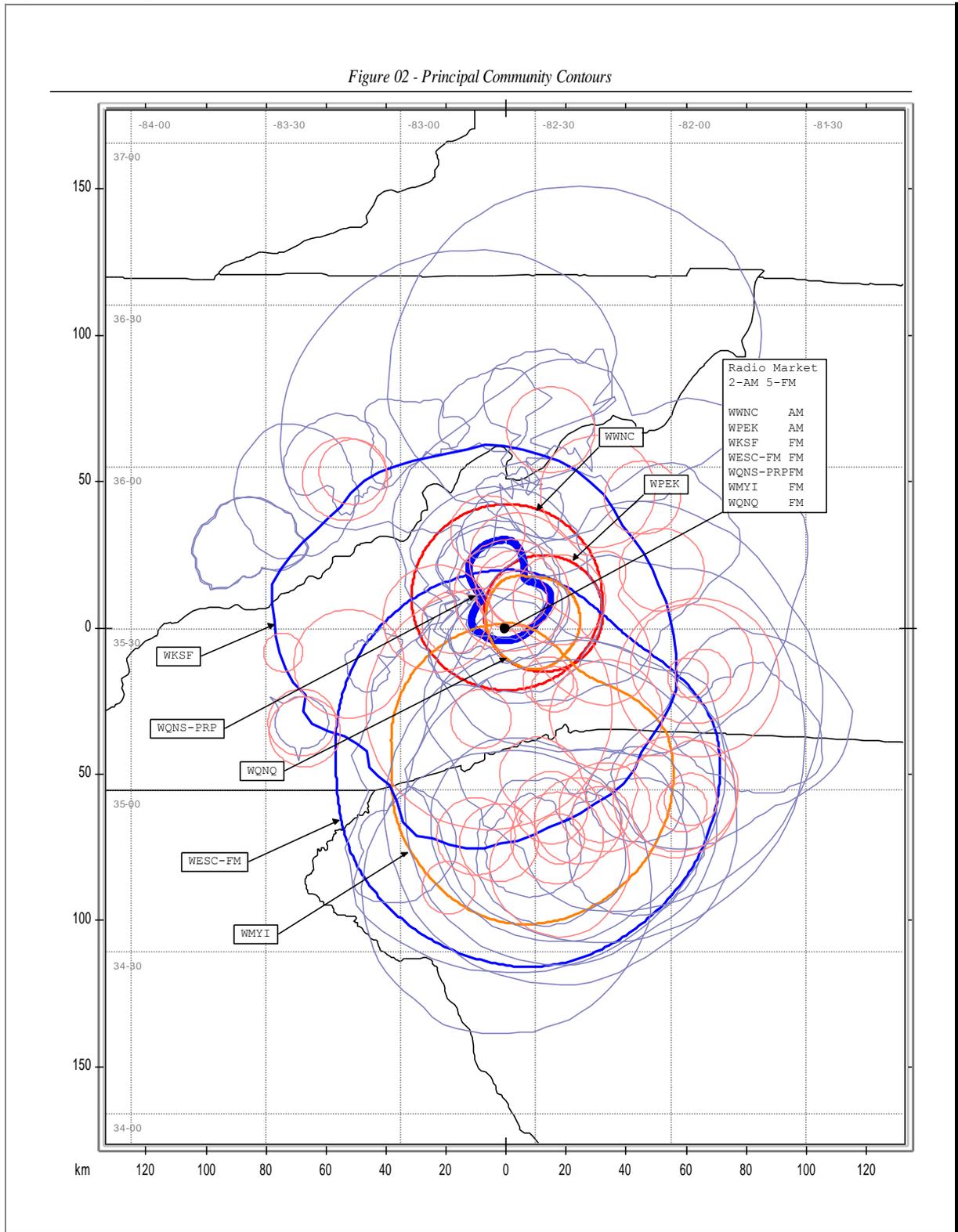


Figure 3 - Tabulation of Stations in Radio Market

Count	Call Sign	Facility_id	Licensee	Distance
1	WGCR	2198	ANCHOR BAPTIST BROADCASTING ASSOCIATION	29.03
2	WGOG	2462	APPALACHIAN BROADCASTING COMPANY, INC.	82.68
3	WLFA	2922	ASHEVILLE EDUCATIONAL ASSOCIATION, INC.	10.53
4	WGSN	84765	BIBLE BELIEVERS NETWORK INC	75.58
5	WYFG	5132	BIBLE BROADCASTING NETWORK, INC.	87.9
6	WFGW	5972	BLUE RIDGE BROADCASTING CORP.	26.38
7	WMIT	5970	BLUE RIDGE BROADCASTING CORPORATION	38.97
8	WAEZ	54601	BRISTOL BROADCASTING COMPANY, INC.	63.16
9	WNPC	70636	BRISTOL BROADCASTING COMPANY, INC.	73.35
10	WLNQ	73346	BRISTOL BROADCASTING COMPANY, INC.	76.88
11	WPJF	73297	CHESAPEAKE-PORTSMOUTH BROADCASTING CORPORATION	71.21
12	WJFJ	54614	COLUMBUS BROADCAST CORPORATION, INC.	45.78
13	WJMZ-FM	1303	COX RADIO, INC.	89.67
14	WDAB	15237	DABNEY-ADAMSON BROADCASTING, INC.	64.25
15	WOLI-FM	73239	DAVIDSON MEDIA STATION WOLI LICENSEE, LLC	74.88
16	WOLT	73241	DAVIDSON MEDIA STATION WOLT LICENSEE, LLC	71.56
17	WOLI	34388	DAVIDSON MEDIA STATION WSPA LICENSEE, LLC	77.53
18	WSEV-FM	17059	EAST TENNESSEE RADIO GROUP, L.P.	88.65
19	WPFT	170936	EAST TENNESSEE RADIO GROUP, L.P.	88.65
20	WSPG	3026	EKO MEDIA GROUP, INC.	86.49
21	WTPT	4677	ENTERCOM GREENVILLE LICENSE, LLC	43.72
22	WYRD	34389	ENTERCOM GREENVILLE LICENSE, LLC	74.78
23	WFBC-FM	34390	ENTERCOM GREENVILLE LICENSE, LLC	44.19
24	WYRD-FM	53623	ENTERCOM GREENVILLE LICENSE, LLC	84.67
25	WORD	66390	ENTERCOM GREENVILLE LICENSE, LLC	81.99
26	WSPA-FM	66400	ENTERCOM GREENVILLE LICENSE, LLC	47.98
27	WPJM	2319	FULL GOSPEL WPJM 800 AM RADIO, INC.	70.77
28	WGWG	23156	GARDNER-WEBB JUNIOR COLLEGE, INC.	87.52
29	WRGC	73286	GEORGIA-CAROLINA RADIOCASTING COMPANY, LLC	53.99
30	WAHT	24482	GOLDEN CORNERS BROADCASTING, INC.	91.74
31	WSQL	54616	GONUTS MEDIA LLC	32.86
32	WWOL	27479	HOLLY SPRINGS BAPTIST BROADCASTING CO., INC.	67.35
33	WZGM	40654	HRN BROADCASTING, INC.	20.41
34	WKJV	2921	INTERNATIONAL BAPTIST OUTREACH MISSIONS	10.79
35	WCAB	29261	ISOTHERMAL BROADCASTING COMPANY, INC	64.29
36	WNCW	29262	ISOTHERMAL COMMUNITY COLLEGE	38.96
37	WBHN	62338	LIGHTHOUSE BROADCASTING, INC.	75.14
38	WSKY	56521	MACON MEDIA, INC.	10.51
39	WKYK	40247	MARK MEDIA, INC.	55.64
40	WCKI	60503	MEDIATRIX SC, INC.	72.27
41	WGMA	43713	MOONGLOW BROADCASTING, INC.	64.11
42	WTOE	46322	MOUNTAIN VALLEY MEDIA, INC.	63.82
43	WASC	48629	NEW SOUTH BROADCASTING CORPORATION	86.32
44	WPCI	51487	PAPER CUTTERS, INC.	75.29

Count	Call Sign	Facility_id	Licensee	Distance
45	WIKQ	15518	RADIO GREENEVILLE, INC.	68.54
46	WHKP	54615	RADIO HENDERSONVILLE, INC.	23.98
47	WQUT	67673	RADIO LICENSE HOLDING CBC, LLC	87.81
48	WLFJ-FM	54856	RADIO TRAINING NETWORK, INC.	65.87
49	WCSZ	25235	REDEMPITIVE STRATEGIES BROADCASTING, LLC	67.3
50	WOXL-FM	37242	SAGA COMMUNICATIONS OF NORTH CAROLINA, LLC	10.59
51	WYSE	51155	SAGA COMMUNICATIONS OF NORTH CAROLINA, LLC	22.77
52	WISE	68835	SAGA COMMUNICATIONS OF NORTH CAROLINA, LLC	12.74
53	WTMT	72070	SAGA COMMUNICATIONS OF NORTH CAROLINA, LLC	10.59
54	WHBK	61264	SEAY BROADCASTING, INC.	32.79
55	WPTL	60572	SKYCOUNTRY BROADCASTING, INC.	17.28
56	WZTH	172987	SOLID FOUNDATION BROADCASTING CORPORATION	71.61
57	WEPR	60926	SOUTH CAROLINA EDUCATIONAL TV COMMISSION	65.83
58	WNCC-FM	14551	SUTTON RADIOCASTING CORPORATION	75.97
59	WFSC	14554	SUTTON RADIOCASTING CORPORATION	75.94
60	WTBI-FM	64496	TABERNACLE BAPTIST BIBLE COLLEGE	76.9
61	WTBI	64497	TABERNACLE CHRISTIAN SCHOOLS	72.75
62	WTZQ	68831	TIMELESS MEDIA INC	27.37
63	WPFJ	17566	TOCCOA FALLS COLLEGE	76.52
64	WELP	27423	UPSTATE RADIO, INC	74.41
65	WAGY	70700	WAGY, INC.	68.97
66	WBRM	71233	WBRM, INC.	56.05
67	WEMB	70509	WEMB, INCORPORATED	68.96
68	WXIS	71481	WEMB, INCORPORATED	72.78
69	WWCU	71766	WESTERN CAROLINA UNIVERSITY	46.32
70	WCQS	71923	WESTERN NORTH CAROLINA PUBLIC RADIO	10.24
71	WYQS	40436	WESTERN NORTH CAROLINA PUBLIC RADIO, INC.	42.13
72	WLIK	73208	WLIK, INC	73.48
73	WMUU-FM	73296	WMUU, INC.	65.81