

**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:<sup>1</sup>

**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              |
| <b>WQNS-Prp</b> | <b>41008</b> | <b>FM</b> | <b>Waynesville to Woodfin</b> | <b>Haywood to Buncombe</b> | <b>Asheville, NC</b>       | <b>Asheville, NC</b>       |
| 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.<sup>3</sup>

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 Metro<sup>4</sup> 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

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

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

<sup>3</sup> See 47 C.F.R. § 73.3555(a).

<sup>4</sup> 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 METRO<sup>5</sup>**

| 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.

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<sup>5</sup> 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 01 - Market-Defining Principal Community Contours

The map displays the Charlotte, NC area with latitude and longitude coordinates. The latitude ranges from 34-00 to 37-00, and the longitude ranges from -84-00 to -81-30. A scale bar at the bottom indicates distances in km, ranging from 0 to 120. The map shows the principal community contours for the Charlotte radio market, defined by the 2-AM and 5-FM service areas. The contours are color-coded: black for the 2-AM service area, red for the 5-FM service area, and blue for the combined service area. The map also includes labels for various radio stations and their formats:

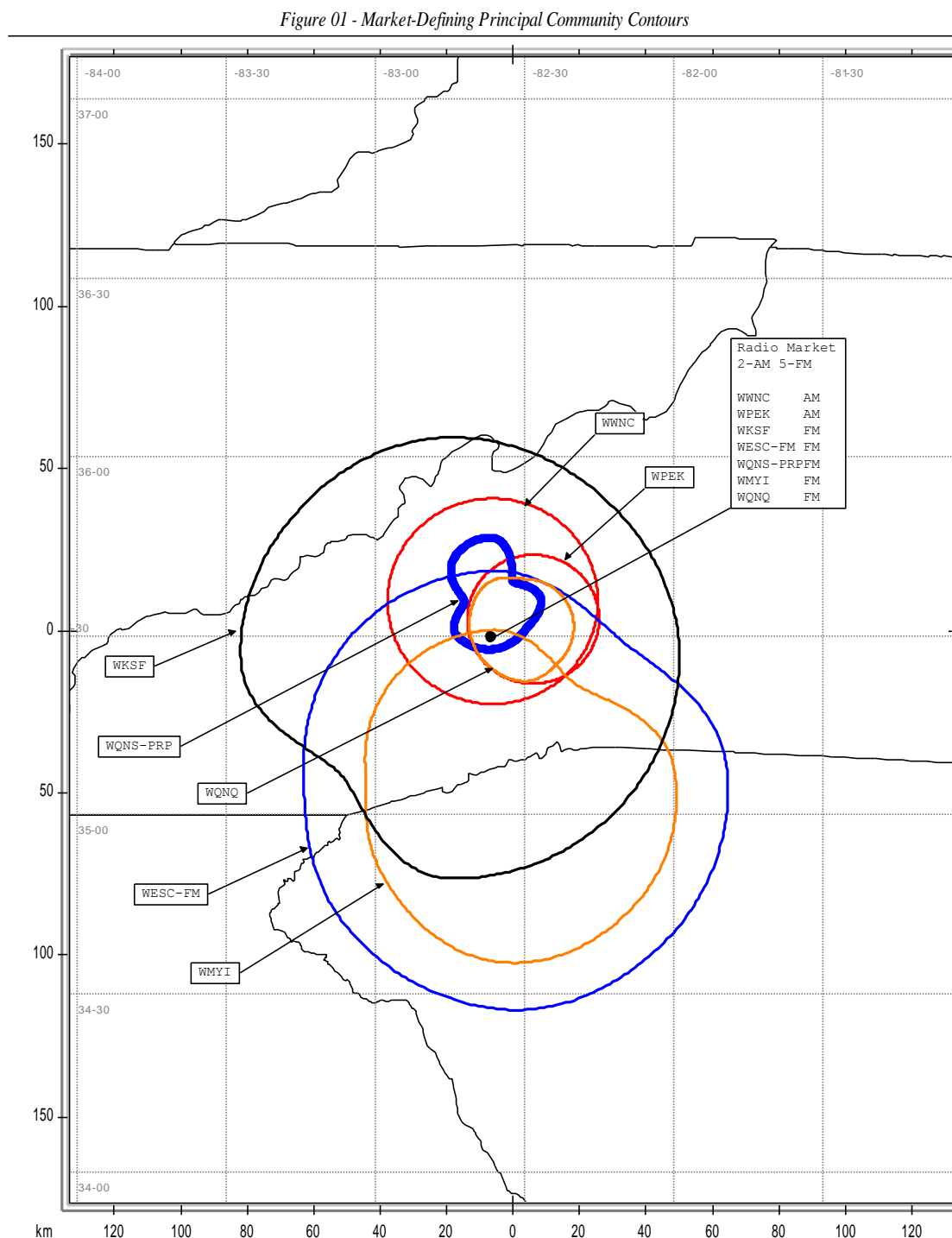
| Radio Market |    |
|--------------|----|
| 2-AM 5-FM    |    |
| WWNC         | AM |
| WPEK         | AM |
| WKSF         | FM |
| WESC-FM      | FM |
| WQNS-PRPFM   | FM |
| WMYI         | FM |
| WQNQ         | FM |

The map shows the following stations and their formats:

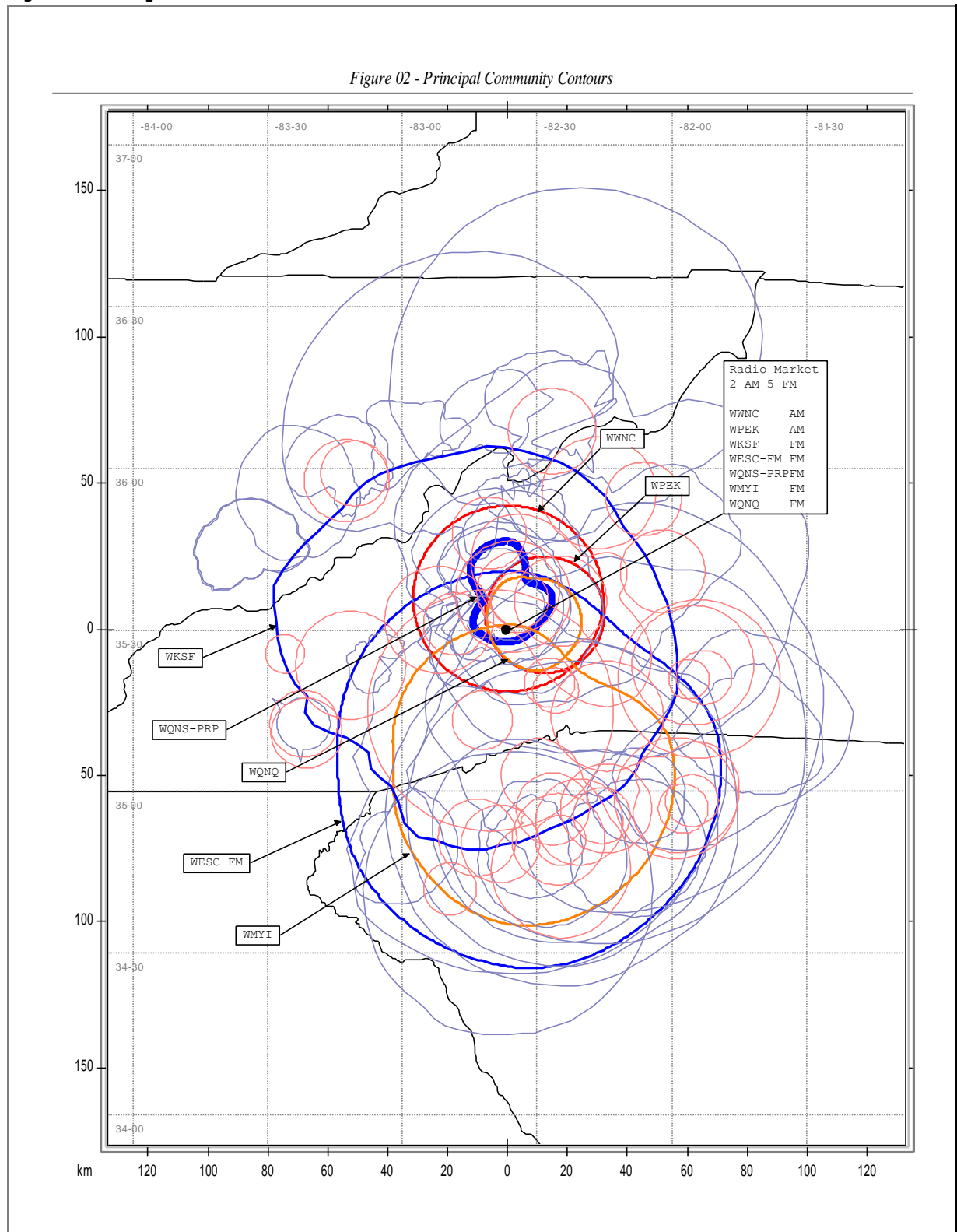
- WWNC: AM
- WPEK: AM
- WKSF: FM
- WESC-FM: FM
- WQNS-PRPFM: FM
- WMYI: FM
- WQNQ: FM

The map also shows the following stations and their formats:

- WQNS-PRP
- WQNQ
- WESC-FM
- WMYI



**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    |