

MULTIPLE OWNERSHIP

WCLY-AM, LLC, the licensee of the subject station WCLY(AM), Raleigh, NC, is an indirect subsidiary of Capitol Broadcasting Company, Inc. (“CBC”). As demonstrated below, CBC complies with the Commission’s multiple ownership rules, 47 C.F.R. § 73.3555.

CBC holds an attributable interest in the following broadcast stations in the Raleigh market:

- 1) Two television stations in the Raleigh-Durham Designated Market Area (“DMA”): WRAL-TV, Raleigh, and WRAZ(TV), Raleigh; and
- 2) Four radio stations (2 AM, 2 FM) in the Raleigh Arbitron Metro market: WRAL-FM, Raleigh, NC; WCMC-FM, Holly Springs, NC; WCLY(AM), Raleigh, NC; and WDNC(AM), Durham, NC.¹

Pursuant to Section 73.3555(c)(2)(i)(A) of the FCC’s rules, an entity may own up to 2 television stations (if permitted under Section 73.3555(b)) and 6 commercial radio stations (if permitted under Section 73.3555(a)) in the same market if at least 20 independently owned media voices would remain in the market post-merger. CBC lawfully owns the 2 television stations in Raleigh as permitted under Section 73.3555(b).

Compliance with Section 73.3555(a) (the Local Radio Ownership Rule)

In a radio market with 45 or more radio stations in the market (as is the case in Raleigh), an entity may own up to 8 commercial radio stations. CBC holds an attributable interest in 4 radio stations in the Raleigh Arbitron Metro market – WCLY(AM), Raleigh, WDNC(AM), Durham, WRAL-FM, Raleigh, and WCMC-FM, Holly Springs. Thus, CBC complies with the local radio ownership rule with respect to the Raleigh Arbitron Metro Market.

Compliance with Section 73.3555(c)(2)(i)(A) (the Radio/TV Cross-ownership Rule)

The TV/radio cross-ownership rule restricts an entity that holds 2 television stations in the market to holding no more than 6 commercial radio stations in the market, provided that more than 20 independently owned media voices will remain in the Raleigh market.

There are more than 20 independently owned media voices in the Raleigh market, as shown below, and therefore CBC complies with the Commission’s multiple ownership and cross-ownership rules.

[chart follows on next page]

¹ CBC also holds an attributable interest in five radio stations in the Wilmington, North Carolina market that are not at issue here, because the noise limited service contours of WRAL-TV and WRAZ(TV) do not overlap the communities of any of those radio stations.

Independently Owned Television Stations,²
Radio Stations,³ Newspapers⁴ and Cable Systems⁵
Located in the Raleigh-Durham, NC Market

- | | |
|---|---|
| 1. ABC/Disney | WTVD(TV) |
| 2. Capitol Broadcasting Company, Inc. (not to be counted) | WRAL-TV, WRAZ(TV), WRAL(FM), WCMC-FM, WDNC(AM), WCLY(AM) |
| 3. Media General | WNCN(TV) |
| 4. Sinclair Broadcast Group | WLFL(TV), WRDC(TV) |
| 5. Multicultural Capital Trust | WRAY-TV |
| 6. Univision | WUVC-DT |
| 7. ION Media Networks | WRPX(TV), WFPX(TV) |
| 8. North Carolina university system | WUNC-TV, WUNP-TV, WUNC(FM), WKNC-FM, WNCU(FM) |
| 9. Radio One Inc. | WFXK(FM), WNNL(FM), WFXC(FM), WQOK(FM) |
| 10. Lamm Media Group LLC | WTSB(AM) |
| 11. Vilkom Interactive Media LLC | WCHL(AM) |
| 12. Clear Channel Communications Inc. | WDCG(FM), WRVA(FM), WRDU(FM), WKSL(FM) |
| 13. Curtis Media Group | WPTF(AM), WQDR(FM), WBBB(FM), WQDR(AM) (Dark), WPLW(FM), WYMY(FM), WKIX(AM) |
| 14. WRBZ, LLC (McClatchey) | WKIX-FM |
| 15. Estuardo Rodriguez | WGSB(AM) (Dark), WRTG(AM), WLLQ(AM) |
| 16. Fellowship Baptist Church Inc. | WHPY(AM) |
| 17. Family Media Group LLC | WMPM(AM) |
| 18. Chatham Broadcasting Co. Inc. | WNCA(AM) |
| 19. WPJL Inc. (William Suttles) | WPJL(AM) |
| 20. Benson Broadcasting Inc. | WPYB(AM) |
| 21. Davidson Media Group LLC | WRJD(AM), WTIK(AM) |
| 22. Truth Broadcasting Corporation | WDRU(AM) |
| 23. St. Augustine's College | WAUG(AM) |
| 24. Liberty University | WVRD(FM) |
| 25. Educational Information Corporation | WCPE-FM |
| 26. Shaw University | WSHA(FM) |
| 27. Duke University | WXDU(FM) |
| 28. Student Educational Broadcasting Inc. | WXYC(FM) |
| 29. Johnson Broadcast Ventures Ltd. | WYRN(AM) |
| 30. Prieto Broadcasting Inc. | WDUR(AM), WETC(AM) |
| 31. Radio Training Network, Inc. | WRTP(FM) |
| 32. The News & Observer Publishing Co. | <i>The News & Observer (7-days/week daily newspaper)</i> |
| 33. Fayetteville Publishing Company | <i>The Fayetteville Observer (7-days/week daily newspaper)</i> |
| 34. Time Warner Cable | Time Warner Cable |

² Included are TV stations located and operating within the Raleigh DMA.

³ Included are radio stations in the Raleigh Arbitron Metro Market.

⁴ Included are daily English language newspapers that are published at least 4 days a week and that have a circulation exceeding 5% of the households in the market.

⁵ Included is one cable service.



FCC Geographic Market Definition for Raleigh-Durham, NC

Call Letters	AM/FM	Freq	Station Type	Format	Home Market	Market Home		City & State of License	County of License	
						Designn Date	Mkt Rank			
WAUG	AM	750	C	Talk	Raleigh-Durham, NC	07/02/2003	42	St Augustine's College	New Hope, NC	Franklin
WBBB	FM	96.1	C	Rock	Raleigh-Durham, NC	07/02/2003	42	Curtis Media Group	Raleigh, NC	Wake
WCHL	AM	1360	C	Nws/TK/Spt	Raleigh-Durham, NC	07/02/2003	42	Vikonn Interactive Media LLC	Chapel Hill, NC	Orange
WCLY	AM	1550	C	Span/Spts	Raleigh-Durham, NC	07/02/2003	42	Capitol Broadcasting Company Inc	Raleigh, NC	Wake
WCNC	FM	99.9	C	Sports	Raleigh-Durham, NC	12/06/2005	42	Capitol Broadcasting Company Inc	Holly Springs, NC	Wake
WCPE	FM	89.7	NC	Classical	Raleigh-Durham, NC	07/02/2003	42	Educational Information Corporation	Raleigh, NC	Wake
WDCG	FM	105.1	C	CHR	Raleigh-Durham, NC	07/02/2003	42	Clear Channel Communications Inc	Durham, NC	Durham
WDNC	AM	620	C	Spts/Talk	Raleigh-Durham, NC	07/02/2003	42	Capitol Broadcasting Company Inc	Durham, NC	Durham
WDRU	AM	1030	C	Christian	Raleigh-Durham, NC	07/02/2003	42	Truth Broadcasting Corporation	Creedmoor, NC	Granville
WDUR	AM	1490	C	Span/Relgn	Raleigh-Durham, NC	07/02/2003	42	Prieto Broadcasting Inc	Durham, NC	Durham
WETC	AM	540	C	Span/Varty	Raleigh-Durham, NC	07/02/2003	42	Prieto Broadcasting Inc	Wendell-Zebulon, NC	Wake
WFXC	FM	107.1	C	Urban AC	Raleigh-Durham, NC	07/02/2003	42	Radio One Inc	Durham, NC	Durham
WFXX	FM	104.3	C	Urban AC	Raleigh-Durham, NC	07/02/2003	42	Radio One Inc	Tarboro, NC	Edgecombe
WGSS	AM	1060	C	DARK	Raleigh-Durham, NC	07/02/2003	42	Rodriguez, Estuardo	Mebane, NC	Alamance
WHPY	AM	1590	C	Christian	Raleigh-Durham, NC	07/02/2003	42	Fellowship Baptist Church, Inc	Clayton, NC	Johnston
WKIX	AM	850	C	Oldies	Raleigh-Durham, NC	07/02/2003	42	Curtis Media Group	Raleigh, NC	Wake
WKIX	FM	102.9	C	Oldies	Raleigh-Durham, NC	07/02/2003	42	McClatchey Broadcasting Company LLC	Raleigh, NC	Wake
WKNC	FM	88.1	NC	Variety	Raleigh-Durham, NC	07/02/2003	42	North Carolina State University	Raleigh, NC	Wake
WKSJ	FM	93.9	C	Rhythmic/AC	Raleigh-Durham, NC	07/02/2003	42	Clear Channel Communications Inc	Cary, NC	Wake
WLLQ	AM	1530	C	Spanish AC	Raleigh-Durham, NC	07/02/2003	42	Rodriguez, Estuardo	Chapel Hill, NC	Orange
WMPM	AM	1270	C	Cty/Gsp/BG	Raleigh-Durham, NC	07/02/2003	42	Family Media Group LLC	Smithfield, NC	Johnston
WVCA	AM	1570	C	AC/Nws/Inf	Raleigh-Durham, NC	07/02/2003	42	Chatham Broadcasting Co Inc	Siler City, NC	Chatham
WNCU	FM	90.7	NC	Jazz	Raleigh-Durham, NC	07/02/2003	42	North Carolina Central University	Durham, NC	Durham
WNNL	FM	103.9	C	Urban/Inspr	Raleigh-Durham, NC	07/02/2003	42	Radio One Inc	Fuquay-Varina, NC	Wake
WPJL	AM	1240	C	Religion	Raleigh-Durham, NC	07/02/2003	42	WPJL Inc	Raleigh, NC	Wake
WPLW	FM	102.5	C	Top 40	Raleigh-Durham, NC	07/02/2003	42	Curtis Media Group	Hillsborough, NC	Orange
WPTF	AM	680	C	News/Talk	Raleigh-Durham, NC	07/02/2003	42	Curtis Media Group	Raleigh, NC	Wake
WPYB	AM	1130	C	Cty/Gsp/BG	Raleigh-Durham, NC	07/02/2003	42	Benson Broadcasting Inc	Benson, NC	Johnston
WQDR	FM	94.7	C	Country	Raleigh-Durham, NC	07/02/2003	42	Curtis Media Group	Raleigh, NC	Wake
WQDR	AM	570	C	DARK	Raleigh-Durham, NC	07/02/2003	42	Curtis Media Group	Raleigh, NC	Wake
WQOK	FM	97.5	C	Urban	Raleigh-Durham, NC	07/02/2003	42	Radio One Inc	Carboro, NC	Orange
WRAL	FM	101.5	C	AC	Raleigh-Durham, NC	07/02/2003	42	Capitol Broadcasting Company Inc	Raleigh, NC	Wake
WRDU	FM	106.1	C	Talk	Raleigh-Durham, NC	07/02/2003	42	Clear Channel Communications Inc	Knightsdale, NC	Wake
WRJD	AM	1410	C	Gosp/ITalk	Raleigh-Durham, NC	07/02/2003	42	Davidson Media Group LLC	Durham, NC	Durham

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

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Raleigh-Durham, NC

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market			City & State of License	County of License
							Designn Date	Home Mkt Rank	Owner		
WRTG	AM	1000	C	Spanish AC	Raleigh-Durham, NC		07/02/2003	42	Rodriguez, Estuardo	Garner, NC	Wake
WRTP	FM	88.5	NC	ChrisContem	Raleigh-Durham, NC		06/22/2009	42	Radio Training Network Inc	Franklinton, NC	Franklin
WRVA	FM	100.7	C	Cisc Hits	Raleigh-Durham, NC		07/02/2003	42	Clear Channel Communications Inc	Wake Forest, NC	Wake
WSHA	FM	88.9	NC	Jazz	Raleigh-Durham, NC		07/02/2003	42	Shaw University	Raleigh, NC	Wake
WTKL	AM	1310	C	Mexican	Raleigh-Durham, NC		07/02/2003	42	Davidson Media Group LLC	Durham, NC	Durham
WTSB	AM	1090	C	News/Talk	Raleigh-Durham, NC		07/02/2003	42	Lamm Media Group LLC	Selma, NC	Johnston
WLUNC	FM	91.5	NC	Nws/TK/Inf	Raleigh-Durham, NC		07/02/2003	42	University of North Carolina	Chapel Hill, NC	Orange
WVRD	FM	90.5	NC	Religion	Raleigh-Durham, NC		01/25/2008	42	Liberty University Inc	Zebulon, NC	Wake
WWPL	FM	102.3	C	Top 40	Raleigh-Durham, NC		10/26/2006	42	Curtis Media Group	Smithfield, NC	Johnston
WXDU	FM	88.7	NC	Variety	Raleigh-Durham, NC		07/02/2003	42	Duke University	Durham, NC	Durham
WXYY	FM	89.3	NC	Educal/Varty	Raleigh-Durham, NC		07/02/2003	42	Student Educational Broadcasting Inc	Chapel Hill, NC	Orange
WWMY	FM	96.9	C	Mexican	Raleigh-Durham, NC		07/02/2003	42	Curtis Media Group	Goldsboro, NC	Wayne
WVRN	AM	1480	C	Gosp/Rel/Bi	Raleigh-Durham, NC		07/02/2003	42	Johnson Broadcast Ventures Ltd	Louisburg, NC	Franklin

Number of Stations in Geographic Market 47

Previous Stations in Geographic Market

WZTK	FM	101.1	C	News/Talk	Greensboro-Winston Salem-High Point,		11/03/2004	45	Curtis Media Group	Burlington, NC	Alamance
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