

MULTIPLE OWNERSHIP STUDY

The instant application seeks Commission consent to the assignment of licenses for Radio Station WROM(AM), Rome, Georgia (FCC Facility ID No. 66283), from **HEIRBORN MINISTRIES, INC.**, to **ROME RADIO PARTNERS, LLC** (“RRP”). This showing is to provide a demonstration of compliance by RRP, with the Commission’s multiple ownership rules.

Rome, Georgia, is located in the foothills of the Appalachian Mountains, and is the largest city and the county seat of Floyd County, Georgia. Rome is the principal city of the *Rome, Georgia Metropolitan Statistical Area* which encompasses all of Floyd County.

Subject to the approval of the instant application, RRP, or principals of RRP will have interests in the following broadcast/media facilities in the Rome area:

1. Radio Station WRBF(FM), Plainville, Georgia (Facility I.D. No. 171028), and FM Translator Station W258CH, Rome, GA (FCC Facility ID No. 147620);^{1/}
2. Radio Stations WRGA(AM), Rome, Georgia (FCC Facility ID No. 40856); WQTU(FM), Rome, Georgia (FCC Facility ID No. 40816), and WROM(AM), Rome, Georgia (FCC Facility ID No. 66283).
3. A Local Marketing Agreement (“LMA”) involving **COOSA BROADCASTING CORPORATION** pertaining to Radio Station WSRM(FM), Coosa, Georgia (FCC Facility ID No. 30623);^{2/} and
4. An LMA involving **WOMAN’S WORLD BROADCASTING, INC.**, pertaining to Radio Station WGJK(AM), Rome, Georgia (FCC Facility ID No. 7044).
5. An officer’s position with Cox Radio, Inc., and the broadcast stations shown on **Attachment A**, hereto

N.B.: The instant assignment application is part of an exchange transaction whereby RRP will exchange Radio Station WZOT(AM), Rockmart, Georgia (FCC Facility ID No. 7041) in return for Radio Station WROM(AM), Rome, Georgia (FCC Facility ID No.

^{1/} Plainville, Georgia, is located approximately 12.5 miles (20.2 km) north-north-east of Rome, Georgia. These stations are owned individually by Howard C. Toole.

^{2/} Coosa, Georgia, is situated approximately 15 miles (24.1 km) west-south-west of Rome, GA.

66283). Hence, for multiple ownership purposes, there will effectively be *no* increase in the number RRP's current station ownership interests.

Aside from the afore-referenced facilities, neither RRP, nor any of its other principals have any other broadcast or media interests. Thus, RRP, will have an attributable interest in a total of six radio broadcast stations – three (3) FM stations and three (3) AM stations in the defined market.

FM STATIONS	FCC FACILITY ID NOS.		AM STATIONS	FCC FACILITY ID NOS.
WQTU	40816		WGJK	7044
WRBF	171028		WRGA	40856
WSRM	30623		WROM	66283

As a result, compliance with the Commission's multiple ownership rule is to be determined under the interim contour overlap method as outlined in the June 2, 2003 Report & Order in MB Docket No. 02-277 *et al.* As reflected by the attached engineering analysis (**Attachment B**), the market for the six radio stations really is defined by the primary service contours for the six above-referenced stations. That market, which is determined by using the FM 70 dBu (3.16 mV/m) and the AM 5 mV/m contours, contains twenty-three (23) radio stations. That includes both commercial and non-commercial FM and AM stations.

Section 73.3555(a)(iii) of the Commission's Rules provides that in a radio market with between fifteen (15) and twenty-nine (29) full-power commercial and non-commercial radio stations, a single entity, or entities under common control, may have a cognizable interest in licenses for not more than six (6) commercial radio stations, in total, and not more than four (4) commercial stations in the same service. Given the fact that, optimally, RRP will have an interest in a total of six (6) commercial stations, three (3) of which are FM stations and three (3) of which are AM stations, RRP is in compliance with Section 73.3555(a) of the Rules.

Accordingly, it is respectfully submitted that the instant assignment application of RRP to acquire Radio Station WROM(AM), Rome, Georgia (FCC Facility ID No. 66283) – in exchange for Radio Station WZOT(AM), Rockmart, Georgia (FCC Facility ID No. 7041) – is in full compliance of Section 73.3555 of the Commission's rules and, therefore, ought to be granted.

COX RADIO, INC. STATIONS

ENGINEERING ANALYSIS

Duopoly Study

Center = 34 14 02 N, 85 13 50 W

10-31-2014

	Call	Coordinates	Dist	Bear	Chan	Pwr(kW)	City	State	File #
1	>*WQTU	341402.0 851350			272A	1.10	User Reference		
2	>WGJK.L	341615N 851100W			1360	000.5	User Reference		
3	>WQTU.L	341402N 851350W			272A	1.10	User Reference		
4	>WRBF.L	342035N 850220W			285A	0.95	User Reference		
5	>WRGA.L	341805N 850919W			1470	005.0	User Reference		
6	>WROM.L	341511N 850919W			710	001.0	User Reference		
7	>WSRM.L	341402N 851350W			228A	1.20	User Reference		
8	WATG.L	342810N 851748W	26.8	347	239A	1.3	Trion	GA	BLH19961009KB
9	WEBS.L	342925N 845504W	40.5	45	1030	5	CALHOUN	GA	BL20050324AJD
10	WGAA.L	340206N 851504W	22.1	184	1340	1	CEDARTOWN	GA	BL
11	WGJK-N.L	341615N 851100W	6	46	1360	0.047	ROME	GA	BL19850222AH
12	WGPB.L	341405N 851348W	0.1	28	249C3	4.2	Rome	GA	BMLED20080407ABR
13	WGTA.L	342753N 852112W	28	336	950	5	SUMMERVILLE	GA	BL9029
14	WGTA-N.L	342753N 852112W	28	336	950	0.11	SUMMERVILLE	GA	BL9029
15	WIPK.L	342818N 845308W	41.3	50	233A	6	Calhoun	GA	BLH20111207AHS
16	WJTH.L	342740N 845344W	39.8	50	900	1	CALHOUN	GA	BL
17	WJTH-N.L	342740N 845344W	39.8	50	900	0.266	CALHOUN	GA	BL
18	WLAQ.L	341536N 851219W	3.7	38	1410	1	ROME	GA	BL20080125AEL
19	WLAQ-N.L	341536N 851219W	3.7	38	1410	1	ROME	GA	BL20080125AEL
20	WQRX.L	343320N 853712W	50.6	315	870	10	VALLEY HEAD	AL	BML20090204AEI
21	WRGA-N.L	341805N 850919W	10.2	42	1470	5	ROME	GA	BL
22	WTSHFM.L	341503N 845905W	22.7	85	296C1	100	Aragon	GA	BLH20120522ADU
23	WZQZ.L	342822N 851931W	27.9	341	1180	5	TRION	GA	BL19850409AE

Number in list= 23