

**MULLANEY ENGINEERING, INC.**  
4937-G GREEN VALLEY ROAD  
MONROVIA, MD 21770



## **Compliance With Radio Duopoly Rules**

*Broadcast Communications, Inc., (BCI) is filing an application to acquire Radio Station WRIJ FM at Masontown, PA (Facility ID: 26522). WRIJ is located within the Pittsburgh Radio Market which currently consists of 60 stations. In addition, BCI currently has controlling interest in 3 other FMs and 4 AMs all within 66 km of WRIJ.*

### **Compliance With Duopoly Rules**

**Figure 1** is a map showing the city grade (FM 70 dBu & AM 5 mV/m) contours of the 8 stations (4 FMs and 4 AMs) that BCI would control. In addition, the map highlights the Pittsburgh Radio Market which will have 4 commonly owned stations and the Morgantown-Clarksburg Radio Market that has no commonly owned stations. This map also shows that WRIJ will have contour overlap with WKVE FM and WANB AM.

**Figure 1A** is a 3 page tabulation of the technical specifications of the 4 FMs and 4 AMs that will be commonly owned.

### **Pittsburgh Radio Market - WRIJ**

WRIJ is located within the Pittsburgh Radio Market which currently consists of **60 stations** (see **Appendix A** - BIA Report). In addition, BCI controls WKVE FM, WKFB AM & WKHB AM which are also in the Pittsburgh Radio Market. Acquisition of WRIJ will bring BCI's total ownership in the Pittsburgh Radio Market to **4 stations** (2 FMs + 4 AMs). The FCC ownership rules (Section 73.3555) permits the common ownership of **up to 8 stations** (5 in the same service) in markets with 45 or more stations.

November 2014

## Contour Overlap Evaluation - WRIJ

WRIJ has city grade contour overlap with commonly owned WANB AM which is not part of the Pittsburgh Radio Market so a contour overlap study is required. There will be a 3 commonly owned station overlap (WRIJ FM, WANB AM & WKVE FM).

**Figure 2** is a map showing this 3 station city grade contour overlap (FM 70 dBu & AM 5 mV/m). It also illustrates the transmitter sites of 10 FM and 5 AM all of which are not owned by BCI. Thus, by the contour overlap method **this 3 station duopoly market** consists of **at least 18 Stations** while the minimum number of required stations in such a market is just **6 stations**.

## Summary

The proposed acquisition of WRIJ FM by Broadcast Communications, Inc., is in full compliance with the FCC multiple ownership rules.

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 14th day of November 2014.



**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>	

<b>WRIJ</b>	LIC	US PA	MASONTOWN		BLED	20021001ACE		
106.9 MHz	FM	*295 A	C 298.0	C		N	7/25/2014	
HE'S ALIVE, INCORPORATED								
	N	SHI / 6813-2R / 2 / 1.00		<b>0002151611-S</b>	26522	LICEN -		
N 39° 42' 17.0"		W 79° 46' 30.0"		X	18.00	<b>613999</b>	GRANT - 2/20/2003	
NAD-83: 39° 42' 17.3"		79° 46' 29.2"						
H/V: 0.98(kW)			247.0 m / 810 ft	716.0 m / 2,349 ft	15.0 m / 49 ft		424.0 m / 1,391 ft	

<b>WKVE</b>	LIC	US PA	MOUNT PLEASANT		BLH	20100309AAS		
103.1 MHz	FM	276 B1	C 278.0	C		N	7/25/2014	
BROADCAST COMMUNICATIONS, INC.								
	N	ERI / LPX-3E HW / 3 / 0.50		<b>0005816822</b>	32210	LICEN - 5/4/2010		
N 39° 54' 49.6"		W 79° 37' 57.4"		<b>1259288</b>	31.40	<b>1347673</b>	GRANT - 3/23/2010	
NAD-83: 39° 54' 49.9"		79° 37' 56.5"						
H/V: 4.40(kW)			244.0 m / 800 ft	708.7 m / 2,325 ft	25.9 m / 85 ft		386.0 m / 1,266 ft	

<b>WWHQ (wwhc)</b>	LIC	US MD	OAKLAND		BMLH	19910318KH		
92.3 MHz	FM	222 A		C		N	9/26/2013	
BROADCAST COMMUNICATIONS II, INC.								
	N	- / - / - / -		<b>0022811111</b>	49936	LICEN -		
N 39° 26' 41.0"		W 79° 31' 42.0"			24.00	<b>158263</b>	GRANT - 8/7/1991	
NAD-83: 39° 26' 41.3"		79° 31' 41.2"						
H/V: 1.40(kW)			210.0 m / 689 ft	936.0 m / 3,071 ft	22.0 m / 72 ft		371.0 m / 1,217 ft	

<b>WKHJ</b>	LIC	US MD	MOUNTAIN LAKE PARK		BMLH	19980304KF		
104.5 MHz	FM	283 A		C		N	2/21/2013	
BROADCAST COMMUNICATIONS II, INC.								
	N	- / - / - / -		<b>0022811111</b>	61304	LICEN -		
N 39° 24' 37.0"		W 79° 17' 15.0"			37.00	<b>263123</b>	GRANT - 4/8/1998	
NAD-83: 39° 24' 37.3"		79° 17' 14.1"						
H/V: 1.50(kW)			202.0 m / 663 ft	966.0 m / 3,169 ft	27.0 m / 89 ft		341.0 m / 1,119 ft	



**Figure 1A - Commonly Owned Stations**  
(page 1 of 3)

**Acquisition of WRIJ (FM) - Ch. 295A - Masontown, PA  
by Broadcast Communications - November 2014**

# AM Search Results

7 Records Found (4 Facilities)

DB Updated: 11/10/2014

## Current Owner

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

**WKHB** LIC US PA IRWIN 7/25/2014 BL20010416ABD  
 620 kHz D ND2 U D B C 72893  
 BROADCAST COMMUNICATIONS, INC.  
 N 40° 17' 20.0" W 79° 42' 04.0" 0005851688 72297 LICEN - 6/20/2001  
 5.50(kW) 286.9 @1 km 178.3 @1 mi 562307 GRANT - 6/20/2001  
 1 T 0 3013 08/12/2002  
 NAD-83: 40° 17' 20.3" 79° 42' 03.2"  
[View Towers](#)

**WKHB** LIC US PA IRWIN 7/25/2014 BL20010416ABD  
 620 kHz N ND2 U D B C 72894  
 BROADCAST COMMUNICATIONS, INC.  
 N 40° 17' 20.0" W 79° 42' 04.0" 0005851688 72297 LICEN - 6/20/2001  
 0.050(kW) 286.9 @1 km 178.3 @1 mi 562307 GRANT - 6/20/2001  
 1 T 0 3013 08/12/2002  
 NAD-83: 40° 17' 20.3" 79° 42' 03.2"  
[View Towers](#)

**WKFB (wktw)** LIC US PA JEANNETTE 7/25/2014 BL20031124ATQ  
 770 kHz D NDD D D B C 80685  
 BROADCAST COMMUNICATIONS, INC.  
 N 40° 17' 20.0" W 79° 42' 04.0" 0005851688-S 10026 LICEN -  
 0.750(kW) 317.2 @1 km 197.1 @1 mi 710546 GRANT - 3/26/2004  
 1 T 0 3030 04/19/2004  
 NAD-83: 40° 17' 20.3" 79° 42' 03.2"  
[View Towers](#)

**WMSG** LIC US MD OAKLAND 2/21/2013 BL19971124KC  
 1050kHz D ND1 U D B C 517  
 BROADCAST COMMUNICATIONS II, INC.  
 N 39° 23' 32.0" W 79° 23' 54.0" 0022811111 49935 LICEN - 9/22/2013  
 1.00(kW) 295.4 @1 km 183.6 @1 mi 257372 GRANT - 2/24/1998  
 U U U 1 T 0 02849 02/22/1998  
 NAD-83: 39° 23' 32.4" 79° 23' 53.2"  
[View Towers](#)



**Figure 1A - Commonly Owned Stations**  
(page 2 of 3)

**Acquisition of WRIJ (FM) - Ch. 295A - Masontown, PA  
by Broadcast Communications - November 2014**

**Current Owner**

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

**WMSG** LIC US MD OAKLAND 2/21/2013 BL19971124KC  
 1050kHz N ND1 U D B C 1566  
 BROADCAST COMMUNICATIONS II, INC.  
 N 39° 23' 32.0" W 79° 23' 54.0" 0022811111 49935 LICEN - 9/22/2013  
 0.075(kW) 295.4 @1 km 183.6 @1 mi 257372 GRANT - 2/24/1998  
 U U U 1 T 0 02849 02/22/1998  
 NAD-83: 39° 23' 32.4" 79° 23' 53.2"  
[View Towers](#)

**WANB** LIC US PA WAYNESBURG 7/25/2014 BL20100111AII  
 1210kHz D ND2 D D B C 110487  
 BROADCAST COMMUNICATIONS, INC.  
 N 39° 52' 12.0" W 80° 08' 01.0" 0003776127-S 32211 LICEN - 10/16/2002  
 5.00(kW) 334.1 @1 km 207.6 @1 mi 1357041 GRANT - 3/16/2010  
 1 T 0 3124 05/10/2010  
 NAD-83: 39° 52' 12.3" 80° 08' 00.2"  
[View Towers](#)

**WANB** LIC US PA WAYNESBURG 7/25/2014 BL20100111AII  
 1210kHz C ND2 D D B C 110488  
 BROADCAST COMMUNICATIONS, INC.  
 N 39° 52' 12.0" W 80° 08' 01.0" 0003776127-S 32211 LICEN - 10/16/2002  
 0.710(kW) 334.1 @1 km 207.6 @1 mi 1357041 GRANT - 3/16/2010  
 1 T 0  
 NAD-83: 39° 52' 12.3" 80° 08' 00.2"  
[View Towers](#)



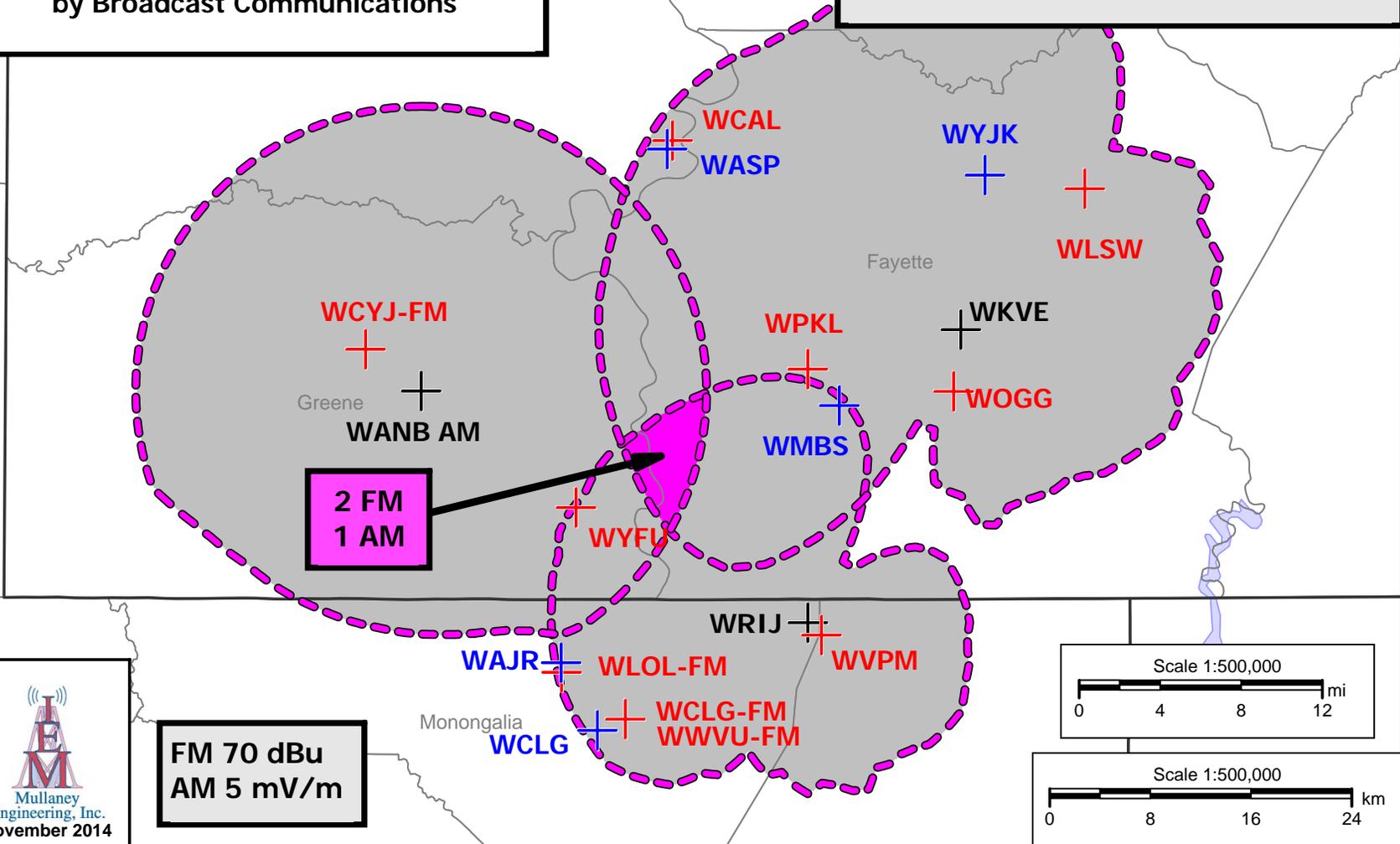
**Figure 1A - Commonly Owned Stations**  
(page 3 of 3)

**Acquisition of WRIJ (FM) - Ch. 295A - Masontown, PA  
by Broadcast Communications - November 2014**

**Figure 2 - Contour Overlap Analysis**  
**3 Station Overlap**

**Acquisition of WRIJ (FM)**  
**Ch. 295A - Masontown, PA**  
**by Broadcast Communications**

**Minimum Required: 6 Stations**  
**Non-Common Stations with**  
**transmitter sites within footprint**  
**10 FM + 5 AM**  
**Market is at least 18 Stations**





## FCC Geographic Market Definition for Pittsburgh, PA

### Appendix A

#### Broadcast Communications, Inc. Acquire WRIJ FM - November 2014

Call Letters	AM/FM	Type Freq	Station	Format	Home Market	Market Designn Date	Home Mkt Rank	Owner	City & State of License	County of License
KDKA	AM	1020	C	News/Talk	Pittsburgh, PA	07/02/2003	25	CBS Radio	Pittsburgh, PA	Allegheny
KDKA	FM	93.7	C	Sports	Pittsburgh, PA	07/02/2003	25	CBS Radio	Pittsburgh, PA	Allegheny
KQV	AM	1410	C	News	Pittsburgh, PA	07/02/2003	25	Calvary Inc	Pittsburgh, PA	Allegheny
WAMO	AM	660	C	Urban	Pittsburgh, PA	07/15/2004	25	Radio Power Inc	Wilkesburg, PA	Allegheny
WAOB	AM	860	NC	Religion	Pittsburgh, PA	07/02/2003	25	Saint Joseph Missions	Millvale, PA	Allegheny
WAOB	FM	106.7	NC	Religion	Pittsburgh, PA	07/02/2003	25	Saint Joseph Missions	Beaver Falls, PA	Allegheny
WBGJ	AM	970	C	Sports	Pittsburgh, PA	07/02/2003	25	iHeartMedia	Pittsburgh, PA	Allegheny
WBUT	AM	1050	C	Country	Pittsburgh, PA	07/02/2003	25	Butler County Media Group Inc	Butler, PA	Butler
WBVP	AM	1230	C	Nws/Tlk/Spt	Pittsburgh, PA	07/02/2003	25	Sound Ideas Media	Beaver Falls, PA	Beaver
WBZZ	FM	100.7	C	Alternative	Pittsburgh, PA	07/02/2003	25	CBS Radio	New Kensington, PA	Westmoreland
WCAL	FM	91.9	NC	Rock	Pittsburgh, PA	07/02/2003	25	Student Association, Inc.	California, PA	Washington
WCNS	AM	1480	C	ASt/Spt/Nws	Pittsburgh, PA	07/02/2003	25	LHTC Media Incorporated	Latrobe, PA	Westmoreland
WDDZ	AM	1250	C	Family Hits	Pittsburgh, PA	07/02/2003	25	ABC/Disney	Pittsburgh, PA	Allegheny
WDSY	FM	107.9	C	Country	Pittsburgh, PA	07/02/2003	25	CBS Radio	Pittsburgh, PA	Allegheny
WDVE	FM	102.5	C	Rock	Pittsburgh, PA	07/02/2003	25	iHeartMedia	Pittsburgh, PA	Allegheny
WEDO	AM	810	C	Variety	Pittsburgh, PA	07/02/2003	25	810 Inc Broadcasting	McKeesport, PA	Allegheny
WESA	FM	90.5	NC	Nws/Tlk/Inf	Pittsburgh, PA	07/02/2003	25	Pittsburgh EPM Inc	Pittsburgh, PA	Allegheny
WGBN	AM	1360	C	DARK	Pittsburgh, PA	07/02/2003	25	p Pentecostal Temple Development Corp	McKeesport, PA	Allegheny
WHJB	FM	107.1	C	Clsc Hits	Pittsburgh, PA	07/02/2003	25	Renda Broadcasting Corporation	Greensburg, PA	Westmoreland
WISR	AM	680	C	Nws/Tlk/Old	Pittsburgh, PA	07/02/2003	25	Butler County Media Group Inc	Butler, PA	Butler
WJAS	AM	1320	C	Talk	Pittsburgh, PA	07/02/2003	25	Iorio, Frank	Pittsburgh, PA	Allegheny
WJPA	AM	1450	C	Oldies	Pittsburgh, PA	07/02/2003	25	p Washington Broadcasting Co	Washington, PA	Washington
WJPA	FM	95.3	C	Oldies	Pittsburgh, PA	07/02/2003	25	p Washington Broadcasting Co	Washington, PA	Washington
WKFB	AM	770	C	Talk/Oldes	Pittsburgh, PA	07/02/2003	25	Broadcast Communications Incorporated	Jeannette, PA	Westmoreland
WKHB	AM	620	C	Tlk/Old/Var	Pittsburgh, PA	07/02/2003	25	Broadcast Communications Incorporated	Irwin, PA	Westmoreland
WKST	FM	96.1	C	CHR	Pittsburgh, PA	07/02/2003	25	iHeartMedia	Pittsburgh, PA	Allegheny
WKVE	FM	103.1	C	AOR	Pittsburgh, PA	08/07/2007	25	Broadcast Communications Incorporated	Mount Pleasant, PA	Westmoreland
WLER	FM	97.7	C	Rock	Pittsburgh, PA	07/02/2003	25	Butler County Media Group Inc	Butler, PA	Butler
WLOG	FM	89.1	NC	Christian	Pittsburgh, PA	04/05/2005	25	Edgewater Broadcasting Incorporated	Markleysburg, PA	Fayette
WLSW	FM	103.9	C	Oldies	Pittsburgh, PA	07/02/2003	25	Wall, Stanley L	Scottdale, PA	Westmoreland
WLTJ	FM	92.9	C	Hot AC	Pittsburgh, PA	07/02/2003	25	Frischling, Saul	Pittsburgh, PA	Allegheny
WMBA	AM	1460	C	Nws/Tlk/Spt	Pittsburgh, PA	07/02/2003	25	Sound Ideas Media	Ambridge, PA	Beaver
WMBS	AM	590	C	Adlt Stndrd	Pittsburgh, PA	07/02/2003	25	Fayette Broadcasting	Uniontown, PA	Fayette

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

"p" indicates pending sale to owner listed



## FCC Geographic Market Definition for Pittsburgh, PA

### Appendix A Broadcast Communications, Inc. Acquire WRIJ FM - November 2014

Call Letters	AM/FM	Type Freq	Station	Format	Home Market	Market Designn Date	Home Mkt Rank	Owner	City & State of License	County of License
WMNY	AM	1150	C	Gospel	Pittsburgh, PA	07/02/2003	25	Pentecostal Temple Development Corp	New Kensington, PA	Westmoreland
WNJR	FM	91.7	NC	Alternative	Pittsburgh, PA	07/02/2003	25	Washington & Jefferson College	Washington, PA	Washington
WOGG	FM	94.9	C	Country	Pittsburgh, PA	07/02/2003	25	Keymarket Communications	Oliver, PA	Fayette
WOGH	FM	103.5	C	Country	Wheeling, WV	05/11/2012	247	Keymarket Communications	Burgettstown, PA	Washington
WOGI	FM	104.3	C	Country	Pittsburgh, PA	07/02/2003	25	Keymarket Communications	Moon Township, PA	Allegheny
WORD	FM	101.5	C	Chrst/Talk	Pittsburgh, PA	07/02/2003	25	Salem Communications Corporation	Pittsburgh, PA	Allegheny
WPGB	FM	104.7	C	Country	Pittsburgh, PA	07/02/2003	25	iHeartMedia	Pittsburgh, PA	Allegheny
WPGR	AM	1510	NC	Religion	Pittsburgh, PA	07/02/2003	25	Saint Joseph Missions	Monroeville, PA	Allegheny
WPIT	AM	730	C	Chrst/Talk	Pittsburgh, PA	07/02/2003	25	Salem Communications Corporation	Pittsburgh, PA	Allegheny
WPKL	FM	99.3	C	Clsc Hits	Pittsburgh, PA	07/02/2003	25	Keymarket Communications	Uniontown, PA	Fayette
WPKV	FM	98.3	NC	ChrsContem	Pittsburgh, PA	07/02/2003	25	Keymarket Communications	Duquesne, PA	Allegheny
WPTS	FM	92.1	NC	Progressive	Pittsburgh, PA	07/02/2003	25	University of Pittsburgh Commonwealth	Pittsburgh, PA	Allegheny
WQED	FM	89.3	NC	Classical	Pittsburgh, PA	07/02/2003	25	WQED Multimedia	Pittsburgh, PA	Allegheny
WQTW	AM	1570	C	Oldies	Pittsburgh, PA	07/02/2003	25	Wall, Stanley L	Latrobe, PA	Westmoreland
WRCT	FM	88.3	NC	Eclectic	Pittsburgh, PA	07/02/2003	25	Carnegie-Mellon Student Government	Pittsburgh, PA	Allegheny
WRIJ	FM	106.9	NC	Christian	Pittsburgh, PA	07/02/2003	25	He's Alive Inc	Masontown, PA	Fayette
WRRK	FM	96.9	C	Bob	Pittsburgh, PA	07/02/2003	25	Frischling, Saul	Braddock, PA	Allegheny
WRWJ	FM	88.1	NC	Christian	Pittsburgh, PA	07/02/2003	25	He's Alive Inc	Murrysville, PA	Westmoreland
WSHH	FM	99.7	C	AC	Pittsburgh, PA	07/02/2003	25	Renda Broadcasting Corporation	Pittsburgh, PA	Allegheny
WSRU	FM	88.1	NC	Alternative	Pittsburgh, PA	07/02/2003	25	Slippery Rock University	Slippery Rock, PA	Butler
WWCS	AM	540	C	Sports	Pittsburgh, PA	07/02/2003	25	Birach Broadcasting Corporation	Canonsburg, PA	Washington
WWNL	AM	1080	C	Chrst/Talk	Pittsburgh, PA	07/02/2003	25	Wilkins Communications Network Inc	Pittsburgh, PA	Allegheny
WWSW	FM	94.5	C	Oldies	Pittsburgh, PA	07/02/2003	25	iHeartMedia	Pittsburgh, PA	Allegheny
WXDX	FM	105.9	C	Alternative	Pittsburgh, PA	07/02/2003	25	iHeartMedia	Pittsburgh, PA	Beaver
WYEP	FM	91.3	NC	AAA	Pittsburgh, PA	07/02/2003	25	Pittsburgh Community Broadcasting Corp	Pittsburgh, PA	Allegheny
WYFU	FM	88.5	NC	Chrst/Talk	Pittsburgh, PA	07/02/2003	25	Bible Broadcasting Network Inc	Masontown, PA	Fayette
WZUM	AM	1550	C	R&B Oldies	Pittsburgh, PA	07/02/2003	25	AM Guys LLC	Braddock, PA	Allegheny

Number of Stations in Geographic Market **60**

Previous Stations in Geographic Market

**BCI will own 2 FM + 2 AM  
Pittsburgh Market has 60 Stations**

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

"p" indicates pending sale to owner listed