

EXHIBIT 5

By this application, Cox Radio, Inc. (“Cox”) seeks Commission consent to modifications for WALR-FM, Palmetto, Georgia. This exhibit demonstrates that WALR-FM would continue to comply with the Commission’s local radio ownership rules following the proposed modifications.

Local Radio Ownership Rule

Under Section 73.3555(a) (1) of the Commission’s rules, the FCC uses a tiered approach, as described below, to determine whether a combination of commonly-owned radio stations comply with the local radio ownership limits for any particular market.¹

| Full-Power Commercial and Non-Commercial Stations in the Market | Maximum Number of Stations in Which a Single Entity May Have an Attributable Interest | Maximum Number of Stations in the Same Service |
|--|--|---|
| 45 or More Stations | 8 Radio Stations | 5 |
| Between 30 and 44 Stations | 7 Radio Stations | 4 |
| Between 15 and 29 Stations | 6 Radio Stations | 4 |
| 14 or Fewer Stations | 5 Radio Stations (provided that no entity may have an interest in more than 50% of the stations in the market) | 3 |

To determine the number of stations in a market, the Commission relies on one of three methodologies:

1. Arbitron Methodology: When more than one commonly owned radio station is licensed to a community within an Arbitron Metro Market, the FCC counts the number of commercial and noncommercial radio stations that are either “home” to the Arbitron market or are licensed to a community within that market (the “Arbitron Methodology”).²

2. Contour Methodology: For combinations that are licensed to communities outside an Arbitron market, the Commission defines the market as the area where the principal community contours for the commonly-owned stations overlap. To determine the number of stations in that market, the Commission counts all stations whose principal

¹ See 47 C.F.R. 73.3555(a) (1) (2006).

² See *Biennial Review*, 18 FCC Rcd at ¶ 280.

community contours overlap that of at least one of the commonly-owned stations. The Commission, however, excludes all stations whose transmitters are greater than 92 kilometers from the mutual overlap area and any commonly owned stations that are not included already in the market (the “Contour Methodology”).³

3. Arbitron-Contour Hybrid Methodology: The FCC requires an analysis under both the Arbitron Methodology and the Contour Methodology in two situations: (i) if at least one of the commonly-owned stations is “home” to an Arbitron market but it is licensed to a community outside that market or (ii) if a station is licensed to a community within an Arbitron market but its principal community contour overlaps that of another commonly-owned station that is not licensed to a community within any Arbitron market (the “Arbitron-Contour Hybrid Methodology”).⁴

Atlanta, Georgia

WALR’s community of license, Palmetto, Georgia, is located inside the Atlanta Arbitron Metro market, and BIA classifies WALR-FM as “home” to the Atlanta Arbitron metro. Upon grant of the instant application, Cox and/or certain officers of Cox will hold an attributable interest in the following radio stations that are licensed to communities located within, near, or otherwise “home” to the Atlanta, Georgia Arbitron Metro market:

| Station | Arbitron Market of Community of License | “Home” Arbitron Market | Licensee |
|--------------------------|--|-------------------------------|----------------------------------|
| WTSH-FM, Aragon, GA | None | Atlanta | Women’s World Broadcasting, Inc. |
| WSB(AM) Atlanta, GA | Atlanta | Atlanta | Cox Radio, Inc. |
| WSB-FM Atlanta, GA | Atlanta | Atlanta | Cox Radio, Inc. |
| WSBB-FM Doraville, GA | Atlanta | Atlanta | Cox Radio, Inc. |
| WALR-FM Palmetto, GA | Atlanta | None | Cox Radio, Inc. |
| WSRV(FM) Gainesville, GA | Atlanta | None | Cox Radio, Inc. |

The Arbitron-Contour Methodology is appropriate for this application. According to BIA, WTSH-FM and WSRV(FM) are both “home” to the Atlanta Arbitron Metro market, but both station’s communities of license are outside of all Arbitron Metro markets. Accordingly, Cox must demonstrate compliance with the local radio ownership rule using the Arbitron-Contour Hybrid Methodology.

³ See *id.* At ¶ 285.

⁴ See *id.* At ¶ 286 n.606.

Arbitron Methodology: The BIA Media Access Pro Database identifies more than 45 full-power commercial and noncommercial stations as “home” to or licensed within the Atlanta, Georgia market.⁵ Accordingly, Cox may hold an attributable interest in up to eight full-power, commercial station stations, of which five may be in the same service (AM or FM). As shown above, Cox has an attributable interest in six radio stations in the Atlanta Metro market (five FM and one AM). As such, Cox’s ownership interests comply with respect to this market.

Contour Methodology: As shown in the attached engineering exhibit from duTreil, Lundin & Rackley,⁶ Cox’s attributable interest in the above radio stations also complies with the local radio ownership rules.

Accordingly, based on the foregoing, Cox respectfully submits that its proposed modification for WALR-FM fully complies with the Commission’s local radio ownership rules.

⁵ See Attachment 1; BIA Financial Network “FCC Geographic Market Definition, Atlanta, GA,” *available at* BIA Media Access Pro Database.

⁶ See Attachment 2.

ATTACHMENT 1

Atlanta, GA Market Overview
Printout from BIA's "FCC Geographic Market Definition for Atlanta, GA"

FCC Geographic Market Definition for Atlanta, GA

| Call Letters | AM/FM | Freq | Type Station | Format | Home Market | Market Designtn Date | Home Mkt Rank | Owner | City & State of License | County of License |
|--------------|-------|-------|--------------|-------------|-------------|----------------------|---------------|--------------------------------------|-------------------------|-------------------|
| WABE | FM | 90.1 | NC | Nws/Tlk/Cls | Atlanta, GA | 07/02/2003 | 8 | City of Atlanta, Board of Education | Atlanta, GA | Fulton |
| WAEC | AM | 860 | C | Relgn/Inspr | Atlanta, GA | 07/02/2003 | 8 | Beasley Media Group | Atlanta, GA | Fulton |
| WAFS | AM | 1190 | C | Bus News | Atlanta, GA | 07/02/2003 | 8 | Salem Media Group Inc | Atlanta, GA | Fulton |
| WALR | FM | 104.1 | C | Rhythm/Blue | Atlanta, GA | 07/02/2003 | 8 | Cox Media Group | Greenville, GA | Meriwether |
| WAMJ | FM | 107.5 | C | Urban AC | Atlanta, GA | 07/02/2003 | 8 | Radio One Inc | Roswell, GA | Fulton |
| WAOK | AM | 1380 | C | News/Talk | Atlanta, GA | 07/02/2003 | 8 | CBS Radio | Atlanta, GA | Fulton |
| WAOS | AM | 1600 | C | Mexican | Atlanta, GA | 07/02/2003 | 8 | La Favorita Inc | Austell, GA | Cobb |
| WATB | AM | 1420 | C | Internat'l | Atlanta, GA | 07/02/2003 | 8 | MultiCultural Radio Broadcasting Inc | Decatur, GA | De Kalb |
| WAZX | AM | 1550 | C | Asian | Atlanta, GA | 07/02/2003 | 8 | Intelli LLC | Smyrna, GA | Cobb |
| WBHF | AM | 1450 | C | Oldies | Atlanta, GA | 07/02/2003 | 8 | Anverse Inc | Cartersville, GA | Bartow |
| WBTR | FM | 92.1 | C | Country | Atlanta, GA | 07/02/2003 | 8 | Gradick, Steven | Carrollton, GA | Carroll |
| WBZY | FM | 105.3 | C | Mexican | Atlanta, GA | 07/02/2003 | 8 | iHeartMedia | Bowdon, GA | Carroll |
| WCCV | FM | 91.7 | NC | Religion | Atlanta, GA | 07/02/2003 | 8 | Immanuel Broadcasting Network Inc | Cartersville, GA | Bartow |
| WCFO | AM | 1160 | C | Nws/Tlk/Inf | Atlanta, GA | 07/02/2003 | 8 | JW Broadcasting Inc | East Point, GA | Fulton |
| WCHK | AM | 1290 | C | Tropical | Atlanta, GA | 07/02/2003 | 8 | Davis Broadcasting Inc | Canton, GA | Cherokee |
| WCKS | FM | 102.7 | C | Hot AC | Atlanta, GA | 11/01/2010 | 8 | Gradick, Steven | Fruithurst, AL | Cleburne |
| WCLK | FM | 91.9 | NC | Jazz | Atlanta, GA | 07/02/2003 | 8 | Clark Atlanta University | Atlanta, GA | Fulton |
| WCNN | AM | 680 | C | Sports | Atlanta, GA | 07/02/2003 | 8 | Dickey Broadcasting Company | North Atlanta, GA | Fulton |
| WCOH | AM | 1400 | C | Sports | Atlanta, GA | 07/02/2003 | 8 | iHeartMedia | Newnan, GA | Coweta |
| WDCY | AM | 1520 | C | Christian | Atlanta, GA | 07/02/2003 | 8 | Word Christian Broadcasting | Douglasville, GA | Douglas |
| WDGR | AM | 1210 | C | Ethnic | Atlanta, GA | 04/15/2010 | 8 p | Hanmi Media Group LLC | Dahlonega, GA | Lumpkin |
| WDPC | AM | 1500 | C | Christian | Atlanta, GA | 07/02/2003 | 8 | Word Christian Broadcasting | Dallas, GA | Paulding |
| WDWD | AM | 590 | C | Chrst/Talk | Atlanta, GA | 07/02/2003 | 8 | Salem Media Group Inc | Atlanta, GA | Fulton |
| WFOM | AM | 1230 | C | Sports | Atlanta, GA | 07/02/2003 | 8 | Dickey Broadcasting Company | Marietta, GA | Cobb |
| WFSH | FM | 104.7 | C | AC/CCtmp | Atlanta, GA | 07/02/2003 | 8 | Salem Media Group Inc | Athens, GA | Clarke |
| WFTD | AM | 1080 | C | Span/Varty | Atlanta, GA | 07/02/2003 | 8 | Prieto Broadcasting Inc | Marietta, GA | Cobb |
| WGFS | AM | 1430 | C | Ethnic | Atlanta, GA | 07/02/2003 | 8 | MultiCultural Radio Broadcasting Inc | Covington, GA | Newton |
| WGKA | AM | 920 | C | Talk/News | Atlanta, GA | 07/02/2003 | 8 | Salem Media Group Inc | Atlanta, GA | Fulton |
| WGST | AM | 640 | C | Talk | Atlanta, GA | 07/02/2003 | 8 | iHeartMedia | Atlanta, GA | Fulton |
| WHIE | AM | 1320 | C | Cty/Tlk/Spt | Atlanta, GA | 07/02/2003 | 8 | Chappell Communications LLC | Griffin, GA | Spalding |
| WHTA | FM | 107.9 | C | Hip Hop | Atlanta, GA | 07/02/2003 | 8 | Radio One Inc | Hampton, GA | Henry |
| WIFN | AM | 1340 | C | Talk/Sprts | Atlanta, GA | 07/02/2003 | 8 | Dickey Broadcasting Company | Atlanta, GA | Fulton |
| WIGO | AM | 1570 | C | Variety | Atlanta, GA | 07/02/2003 | 8 | Sheridan Broadcasting Corp | Morrow, GA | Clayton |
| WISK | AM | 990 | C | Mexican | Atlanta, GA | 02/14/2008 | 8 | Sumter Broadcasting Co Inc | Lawrenceville, GA | Gwinnett |

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

"p" indicates pending sale to owner listed

FCC Geographic Market Definition for Atlanta, GA

| Call Letters | AM/ FM | Freq | Type Station | Format | Home Market | Market Designtn Date | Home Mkt Rank | Owner | City & State of License | County of License |
|-----------------|-----------|-------|-----------------|-------------|-------------|----------------------------|---------------------|---|----------------------------|----------------------|
| WJBB | AM | 1300 | C | Clsc Hits | Atlanta, GA | 07/02/2003 | 8 | Batten, Jeffrey Taylor | Winder, GA | Barrow |
| WJTP | AM | 890 | C | News/Asian | Atlanta, GA | 03/10/2006 | 8 | Su, James Y | Lithia Springs, GA | Douglas |
| WKEU | AM | 1450 | C | Oldes/Sprts | Atlanta, GA | 07/02/2003 | 8 | WLT Associates LP | Griffin, GA | Spalding |
| WKHX | FM | 101.5 | C | Country | Atlanta, GA | 07/02/2003 | 8 | Cumulus Media Holdings Inc | Marietta, GA | Cobb |
| WKKP | AM | 1410 | C | Country | Atlanta, GA | 07/02/2003 | 8 | Henry County Radio Co | McDonough, GA | Henry |
| WKUN | AM | 1490 | C | Sothn Gspel | Atlanta, GA | 07/02/2003 | 8 | Bostwick Broadcasting Group | Monroe, GA | Walton |
| WLBA | AM | 1130 | C | Mexican | Atlanta, GA | 07/02/2003 | 8 | La Favorita Inc | Gainesville, GA | Cobb |
| WLBB | AM | 1330 | C | News/Talk | Atlanta, GA | 07/02/2003 | 8 | Gradick, Steven | Carrollton, GA | Carroll |
| WLKQ | FM | 102.3 | C | Mexican | Atlanta, GA | 07/02/2003 | 8 | Davis Broadcasting Inc | Buford, GA | Gwinnett |
| WLTA | AM | 1400 | C | Chrst/Talk | Atlanta, GA | 07/02/2003 | 8 | Salem Media Group Inc | Alpharetta, GA | Fulton |
| WLYG | FM | 88.3 | NC | Sothn Gspel | Atlanta, GA | 10/27/2003 | 8 | Joy Christian Ministries | Jasper, GA | Pickens |
| WMLB | AM | 1690 | C | Variety | Atlanta, GA | 10/08/2004 | 8 | JW Broadcasting Inc | Avondale Estates, GA | De Kalb |
| WMVV | FM | 90.7 | NC | Relgn/Inspr | Atlanta, GA | 07/02/2003 | 8 | Life Radio Ministries | Griffin, GA | Spalding |
| WMVW | FM | 91.7 | NC | Relgn/Inspr | Atlanta, GA | 05/14/2010 | 8 | Life Radio Ministries | Peachtree City, GA | Fayette |
| WNEA | AM | 1300 | C | Christian | Atlanta, GA | 07/02/2003 | 8 | Word Christian Broadcasting | Newnan, GA | Coweta |
| WNIV | AM | 970 | C | Chrst/Talk | Atlanta, GA | 07/02/2003 | 8 | Salem Media Group Inc | Atlanta, GA | Fulton |
| WNNX | FM | 100.5 | C | Rock | Atlanta, GA | 07/02/2003 | 8 | Cumulus Media Holdings Inc | College Park, GA | Fulton |
| WNSY | FM | 100.1 | C | Mexican | Atlanta, GA | 07/02/2003 | 8 | Davis Broadcasting Inc | Talking Rock, GA | Pickens |
| WPBC | AM | 1310 | C | Span/CCtmp | Atlanta, GA | 07/02/2003 | 8 | Hanmi Broadcasting Inc | Decatur, GA | De Kalb |
| WPBS | AM | 1040 | C | Korean | Atlanta, GA | 07/02/2003 | 8 | PacificStar Media Corporation | Conyers, GA | Rockdale |
| WPLO | AM | 610 | C | Span/Oldes | Atlanta, GA | 07/02/2003 | 8 | Esquivel, Teresa | Grayson, GA | Gwinnett |
| WPZE | FM | 102.5 | C | Inspiration | Atlanta, GA | 07/02/2003 | 8 | Radio One Inc | Mableton, GA | Cobb |
| WQXI | AM | 790 | C | Hot AC | Atlanta, GA | 07/02/2003 | 8 | Entercom | Atlanta, GA | Fulton |
| WRAS | FM | 88.5 | NC | Variety | Atlanta, GA | 07/02/2003 | 8 | Georgia State University | Atlanta, GA | Fulton |
| WRDA | FM | 105.7 | C | Alternative | Atlanta, GA | 07/02/2003 | 8 | iHeartMedia | Canton, GA | Cherokee |
| WRDG | FM | 96.7 | C | Alternative | Atlanta, GA | 07/02/2003 | 8 | iHeartMedia | Peachtree City, GA | Fayette |
| WREK | FM | 91.1 | NC | Variety | Atlanta, GA | 07/02/2003 | 8 | Georgia Institute of Technology, Communications | Atlanta, GA | Fulton |
| WRFG | FM | 89.3 | NC | Variety | Atlanta, GA | 07/02/2003 | 8 | Radio Free Georgia Broadcasting Foundation | Atlanta, GA | Fulton |
| WSB | AM | 750 | C | News/Talk | Atlanta, GA | 07/02/2003 | 8 | Cox Media Group | Atlanta, GA | Fulton |
| WSB | FM | 98.5 | C | AC | Atlanta, GA | 07/02/2003 | 8 | Cox Media Group | Atlanta, GA | Fulton |
| WSBB | FM | 95.5 | C | News/Talk | Atlanta, GA | 07/02/2003 | 8 | Cox Media Group | Doraville, GA | De Kalb |
| WSRV | FM | 97.1 | C | Clsc Hits | Atlanta, GA | 07/02/2003 | 8 | Cox Media Group | Gainesville, GA | Hall |
| WSTR | FM | 94.1 | C | Hot AC | Atlanta, GA | 07/02/2003 | 8 | Entercom | Smyrna, GA | Cobb |
| WTSH | FM | 107.1 | C | Country | Atlanta, GA | 07/02/2003 | 8 | Woman's World Broadcasting Inc | Aragon, GA | Polk |

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

"p" indicates pending sale to owner listed

FCC Geographic Market Definition for Atlanta, GA

| Call Letters | AM/FM | Freq | Type Station | Format | Home Market | Market Designtn Date | Home Mkt Rank | Owner | City & State of License | County of License |
|--------------|-------|-------|--------------|------------|-------------|----------------------|---------------|--|-------------------------|-------------------|
| WTZA | AM | 1010 | C | R&B Oldies | Atlanta, GA | 07/02/2003 | 8 | K&Z Broadcasting LLC | Atlanta, GA | Fulton |
| WUBL | FM | 94.9 | C | Country | Atlanta, GA | 07/02/2003 | 8 | iHeartMedia | Atlanta, GA | Fulton |
| WUMJ | FM | 97.5 | C | Urban | Atlanta, GA | 07/02/2003 | 8 | Radio One Inc | Fayetteville, GA | Fayette |
| WUWG | FM | 90.7 | NC | CHR | Atlanta, GA | 07/02/2003 | 8 | Georgia Public Telecommunications Commission | Carrollton, GA | Carroll |
| WVEE | FM | 103.3 | C | Urban | Atlanta, GA | 07/02/2003 | 8 | CBS Radio | Atlanta, GA | Fulton |
| WVFJ | FM | 93.3 | C | Chrst/AC | Atlanta, GA | 07/02/2003 | 8 | Radio Training Network, Inc | Greenville, GA | Meriwether |
| WWEV | FM | 91.5 | NC | ChrsContem | Atlanta, GA | 07/02/2003 | 8 | War Hill Christian Fellowship Inc | Cumming, GA | Forsyth |
| WWPW | FM | 96.1 | C | Top 40 | Atlanta, GA | 07/02/2003 | 8 | iHeartMedia | Atlanta, GA | Fulton |
| WWWE | AM | 1100 | C | Variety | Atlanta, GA | 07/02/2003 | 8 | Beasley Media Group | Hapeville, GA | Carroll |
| WWWQ | FM | 99.7 | C | CHR | Atlanta, GA | 07/02/2003 | 8 | Cumulus Media Holdings Inc | Atlanta, GA | Fulton |
| WXEM | AM | 1460 | C | Mexican | Atlanta, GA | 07/02/2003 | 8 | La Favorita Inc | Buford, GA | Gwinnett |
| WXJO | AM | 1120 | C | DARK | Atlanta, GA | 07/03/2006 | 8 | Exponent Broadcasting Inc | Douglasville, GA | Douglas |
| WYAY | FM | 106.7 | C | News | Atlanta, GA | 07/02/2003 | 8 | Cumulus Media Holdings Inc | Gainesville, GA | Hall |
| WYFW | FM | 89.5 | NC | Chrst/Talk | Atlanta, GA | 07/02/2003 | 8 | Bible Broadcasting Network Inc | Winder, GA | Barrow |
| WYXC | AM | 1270 | C | News/Talk | Atlanta, GA | 07/02/2003 | 8 | St Cyr, Anthony D | Cartersville, GA | Bartow |
| WYYZ | AM | 1490 | C | Variety | Atlanta, GA | 07/02/2003 | 8 | KRMA Media Group LLC | Jasper, GA | Pickens |
| WYZE | AM | 1480 | C | Gospel | Atlanta, GA | 07/02/2003 | 8 | GHB Broadcasting | Atlanta, GA | Fulton |
| WZGC | FM | 92.9 | C | Sports | Atlanta, GA | 07/02/2003 | 8 | CBS Radio | Atlanta, GA | Fulton |

Number of Stations in Geographic Market 86

Previous Stations in Geographic Market

| | | | | | | | | | |
|------|----|-------|----|------------|------------|---|------------------------------|--------------|------|
| WNGA | FM | 105.1 | NC | ChrsContem | 08/03/2005 | 0 | Educational Media Foundation | Clermont, GA | Hall |
|------|----|-------|----|------------|------------|---|------------------------------|--------------|------|

ATTACHMENT 2

Engineering Statement of DuTreil, Lundin & Rackley

133383567 v2

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

COX RADIO, INC.

This radio multiple ownership analysis was prepared on behalf of Cox Radio, Inc. (herein “Cox”). Cox proposes in an application for construction permit to modify the facilities of WALR-FM assigned to Palmetto, Georgia. A review of the stations that Cox or its affiliates have interest was completed. Therefore, the following stations are considered under ownership or control for this analysis:

| Call Sign / Facility ID | Location | Facilities |
|---|-----------------|----------------------------|
| WALR-FM/48728 <i>Application</i> | Palmetto, GA | CH 281C2 50 kW 145 M |
| WTSH-FM/7043 <i>License</i> | Aragon, GA | CH 296C1 100 KW 158 M |
| WTSH-FM/7043 <i>CP</i> | Aragon, GA | CH 296C1 100 KW 100.5 M |
| WSBB-FM/11710 <i>License</i> | Doraville, GA | CH 238C1 40 kW 432 M |
| WSBB-FM/11710 <i>Application</i> | Doraville, GA | CH 238C1 100 kW (DA) 250 M |
| WSB-FM/73978 <i>License</i> | Atlanta, GA | CH 253C0 100 kW 313 M |
| WSRV(FM)/59970 <i>License</i> | Gainesville, GA | CH 246C 100 kW 483 M |
| WSRV(FM)/59970 <i>CP</i> | Gainesville, GA | CH 246C1 100 kW 212 M |
| WSB(AM)/73977 <i>Licensed Facility</i> | Atlanta, GA | 750 kHz 50 kW-U ND |

The principal community contours (3.16 mV/m for FM stations, 5 mV/m for AM stations) of the stations are depicted on a map included herein as Figure 1. Since some of these stations have overlapping principal community contours, an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

Radio Market

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned.* There is one “radio market” defined for analysis under the Commission’s Rules created by the proposed WALR-FM facility modification. The table below lists the defined market:

| Defined Radio Market | Stations that Define Radio Market | |
|----------------------|-----------------------------------|--|
| | AM Stations | FM Stations |
| Market 1 | WSB(AM) | WALR-FM(App.)/WSB-FM/WSBB-FM(App.) WSRV(FM) |

Count of Stations in Defined Market

The number of other radio stations in a “radio market” is determined by counting the operating stations having principal community contours that intersect the principal community contours which define the radio market, plus the subject stations that are co-owned. Only those stations located within 92 kilometers of the perimeter of the mutual overlap area of the respective defined market area were employed in the count of the stations. Commonly controlled stations were not considered in the count of stations in the defined markets. The results of the analysis are tabulated below:

| Defined Radio Market | Minimum Number of Other Stations in Radio Market |
|----------------------|--|
| Market 1 | 49 AM, 42 FM; 91 Total |

Figure 2 is a tabulation of the radio stations identified in the defined radio markets tabulated above. It is noted that the tabulation is not a complete list of all of the other stations in the market, but rather enough stations to show compliance with the FCC’s radio multiple ownership rules. Only known licensed, operating stations were employed for the study.

Distances to the AM coverage contours 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 CFR 73.184. Ground conductivity

data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

Based on the above, it is concluded that the applicant will be in compliance with the Section 73.3555(a) of the FCC Rules using the interim contour method.



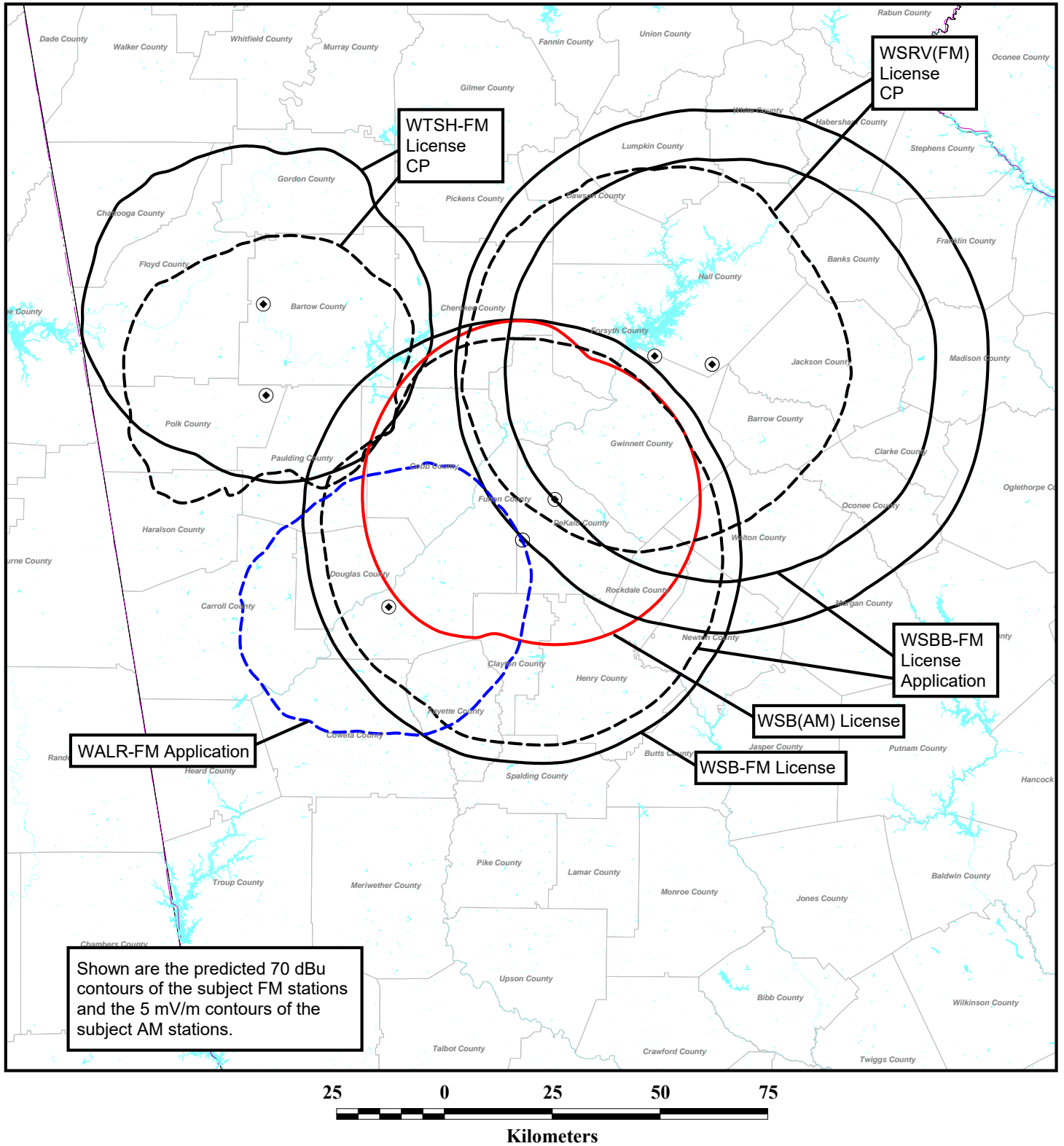
W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, Florida 34237
(941)329-6000

June 29, 2016

* See Order in Implementation of Section 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

Figure 1



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

TECHNICAL STATEMENT RADIO MULTIPLE OWNERSHIP ANALYSIS

Tabulation of Other Stations Defined in Radio Market 1

| <u>AM Stations</u> | | | | |
|--------------------|---------------|-----------------------------|--------------|------------------------|
| <u>Call Sign</u> | <u>Status</u> | <u>Community of License</u> | <u>State</u> | <u>Frequency (kHz)</u> |
| WXEM | LIC | BUFORD | GA | 1460 |
| WLTA | LIC | ALPHARETTA | GA | 1400 |
| WYYZ | LIC | JASPER | GA | 1490 |
| WDGR | LIC | DAHLONEGA | GA | 1210 |
| WFOM | LIC | MARIETTA | GA | 1230 |
| WCNN | LIC | NORTH ATLANTA | GA | 680 |
| WRFC | LIC | ATHENS | GA | 960 |
| WGTJ | LIC | MURRAYVILLE | GA | 1330 |
| WNEA | LIC | NEWNAN | GA | 1300 |
| WGST | LIC | ATLANTA | GA | 640 |
| WPLO | LIC | GRAYSON | GA | 610 |
| WKKP | LIC | MCDONOUGH | GA | 1410 |
| WKEU | LIC | GRIFFIN | GA | 1450 |
| WAEC | LIC | ATLANTA | GA | 860 |
| WWWE | LIC | HAPEVILLE | GA | 1100 |
| WNIV | LIC | ATLANTA | GA | 970 |
| WLBA | LIC | GAINESVILLE | GA | 1130 |
| WYTH | LIC | MADISON | GA | 1250 |
| WHIE | LIC | GRIFFIN | GA | 1320 |
| WIFN | LIC | ATLANTA | GA | 1340 |
| WCOH | LIC | NEWNAN | GA | 1400 |
| WATB | LIC | DECATUR | GA | 1420 |
| WIGO | LIC | MORROW | GA | 1570 |
| WDUN | LIC | GAINESVILLE | GA | 550 |
| WGFS | LIC | COVINGTON | GA | 1430 |
| WPBC | LIC | DECATUR | GA | 1310 |
| WAOS | LIC | AUSTELL | GA | 1600 |
| WJBB | LIC | WINDER | GA | 1300 |
| WKUN | LIC | MONROE | GA | 1490 |
| WCFO | LIC | EAST POINT | GA | 1160 |
| WFTD | LIC | MARIETTA | GA | 1080 |
| WGKA | LIC | ATLANTA | GA | 920 |
| WQXI | LIC | ATLANTA | GA | 790 |
| WDCY | LIC | DOUGLASVILLE | GA | 1520 |
| WGGA | LIC | GAINESVILLE | GA | 1240 |
| WJTP | LIC | LITHIA SPRINGS | GA | 890 |
| WKNG | LIC | TALLAPOOSA | GA | 1060 |

| | | | | |
|-------------|------------|-------------------------|-----------|-------------|
| WLBB | LIC | CARROLLTON | GA | 1330 |
| WPBS | LIC | CONYERS | GA | 1040 |
| WDWD | LIC | ATLANTA | GA | 590 |
| WDPC | LIC | DALLAS | GA | 1500 |
| WAZX | LIC | SMYRNA | GA | 1550 |
| WCHK | LIC | CANTON | GA | 1290 |
| WISK | LIC | LAWRENCEVILLE | GA | 990 |
| WYZE | LIC | ATLANTA | GA | 1480 |
| WAFS | LIC | ATLANTA | GA | 1190 |
| WTZA | LIC | ATLANTA | GA | 1010 |
| WAOK | LIC | ATLANTA | GA | 1380 |
| <u>WMLB</u> | <u>LIC</u> | <u>AVONDALE ESTATES</u> | <u>GA</u> | <u>1690</u> |
| Total 49 | | | | |

FM Stations

| <u>Call Sign</u> | <u>Status</u> | <u>Community of License</u> | <u>State</u> | <u>Frequency (MHz)</u> |
|------------------|---------------|-----------------------------|--------------|------------------------|
| WCDG | LIC | DAHLONEGA | GA | 88.7 |
| WLTS | LIC | BARRETTSVILLE | GA | 90.7 |
| WNGU | LIC | DAHLONEGA | GA | 89.5 |
| WNSY | LIC | TALKING ROCK | GA | 100.1 |
| WMVW | LIC | PEACHTREE CITY | GA | 91.7 |
| WXKT | LIC | MAYSVILLE | GA | 103.7 |
| WUMJ | LIC | FAYETTEVILLE | GA | 97.5 |
| WABE | LIC | ATLANTA | GA | 90.1 |
| WYFW | LIC | WINDER | GA | 89.5 |
| WMOQ | LIC | BOSTWICK | GA | 92.3 |
| WBCX | LIC | GAINESVILLE | GA | 89.1 |
| WNNX | LIC | COLLEGE PARK | GA | 100.5 |
| WBTR-FM | LIC | CARROLLTON | GA | 92.1 |
| WRDA | LIC | CANTON | GA | 105.7 |
| WWPW | LIC | ATLANTA | GA | 96.1 |
| WCLK | LIC | ATLANTA | GA | 91.9 |
| WZGC | LIC | ATLANTA | GA | 92.9 |
| WWEV-FM | LIC | CUMMING | GA | 91.5 |
| WJGA-FM | LIC | JACKSON | GA | 92.1 |
| WRAS | LIC | ATLANTA | GA | 88.5 |
| WPZE | LIC | MABLETON | GA | 102.5 |
| WUBL | LIC | ATLANTA | GA | 94.9 |
| WSTR | LIC | SMYRNA | GA | 94.1 |
| WAMJ | LIC | ROSWELL | GA | 107.5 |
| WZTR | LIC | DAHLONEGA | GA | 104.3 |
| WLKQ-FM | LIC | BUFORD | GA | 102.3 |
| WMVV | LIC | GRIFFIN | GA | 90.7 |
| WYAY | LIC | GAINESVILLE | GA | 106.7 |

| <u>Call Sign</u> | <u>Status</u> | <u>Community of License</u> | <u>State</u> | <u>Frequency (MHz)</u> |
|------------------|---------------|-----------------------------|--------------|------------------------|
| WHTA | LIC | HAMPTON | GA | 107.9 |
| WMSL | LIC | ATHENS | GA | 88.9 |
| WVFJ-FM | LIC | GREENVILLE | GA | 93.3 |
| WREK | LIC | ATLANTA | GA | 91.1 |
| WRFG | LIC | ATLANTA | GA | 89.3 |
| WFSH-FM | LIC | ATHENS | GA | 104.7 |
| WNGC | LIC | ARCADE | GA | 106.1 |
| WRDG | LIC | PEACHTREE CITY | GA | 96.7 |
| WEKS | LIC | ZEBULON | GA | 92.5 |
| WBZY | LIC | BOWDON | GA | 105.3 |
| WVEE | LIC | ATLANTA | GA | 103.3 |
| WUWG | LIC | CARROLLTON | GA | 90.7 |
| WKHX-FM | LIC | MARIETTA | GA | 101.5 |
| <u>WWWQ</u> | <u>LIC</u> | <u>ATLANTA</u> | <u>GA</u> | <u>99.7</u> |
| Total 42 | | | | |