

RADIO MARKET ANALYSIS
RADIO/TELEVISION CROSS OWNERSHIP REVIEW
WHIZ AM / WHIZ-TV - ZANESVILLE, OHIO
WHIZ-FM - SOUTH ZANESVILLE, OHIO
WWDC (FM) - COLUMBUS, OHIO
WZVL (FM) - PHILO, OHIO
June 2013

TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of Henry C. Littick ("Littick") in connection with the proposed transfer of control of WHIZ, 1240 kHz, and WHIZ-TV, Channel 40, Zanesville, Ohio; WHIZ-FM, Channel 224B1, South Zanesville, Ohio; WWCD, Channel 273B1, Baltimore, Ohio; and WZVL, Channel 279A, Philo, Ohio. WWCD is licensed to a community in a metro county in the Columbus, Ohio Arbitron Market. WHIZ, WHIZ-FM and WZVL are not licensed to nor "home" to any Arbitron Market. WHIZ-TV is licensed to Zanesville, Ohio and located in the Zanesville, Ohio DMA.

COLUMBUS, OHIO ARBITRON/BIA MARKET REVIEW

2. As shown on Exhibit #1, there are 47 AM and FM (commercial and non-commercial) stations listed in the Columbus, Ohio Arbitron Market (Market #35). Littick would control one FM station in the market after the transfer of control. The number of stations indicated falls in the forty-five or more stations tier of §73.3555(a)(1)(i) of the Commission's rules. At this level, common ownership or control of up to eight stations, with no more than five in the same service, is permissible. Therefore, Littick is in compliance in the rated Columbus, Ohio market.

CONTOUR OVERLAP ANALYSIS

3. WHIZ, WHIZ-FM and WZVL are not licensed to nor considered “home” to any Arbitron Market, so a contour overlap analysis is necessary to demonstrate compliance. The city grade contours of the three subject stations are shown on Exhibit #2. As noted, the locations of the city grade contours of the stations create a single distinct radio market requiring review. The city grade contours of WHIZ and WHIZ-FM will be used to determine the Radio Market Boundary.¹ These contours will be used to determine the number of other stations in the relevant market to which the subject stations in the respective market will then be added to reach the total number of stations in or providing service to the respective market. No stations with transmitters located more than 92.0 kilometers from the boundary of the common overlap of subject stations will be considered. Further, no other facility controlled by Littick will be considered as a market contributor, unless it is a subject station in the radio market under study.

4. Exhibit #3 is a depiction of the AM and FM stations (commercial and non-commercial) providing service to the Radio Market. Exhibit #4 is a tabulation of the stations in the Radio Market. A total of 19 stations are shown, including the three subject stations. The number of stations depicted falls in the fifteen to twenty-nine stations tier of 73.3555(a)(1)(iii) of the Commission's rules. At this level, common ownership or control of up to six stations with no more than four in the same service is permissible. Therefore, Littick is in compliance in the non-rated Radio Market.

1) The WZVL contour is completely encompassed by the WHIZ contour.

5. Based on the compliance shown in both the rated and non-rated markets, the proposed transfer of control of WWCD, WHIZ, WHIZ-FM and WZVL is in compliance with the Commission's rules, as it relates to the markets reviewed.

RADIO AND TELEVISION CROSS OWNERSHIP REVIEW

6. The transfer of control includes television station WHIZ-TV, Zanesville, Ohio Exhibits #5 depicts the digital noise limited contour of WHIZ-TV, the 60 dBu contours of WWCD, WHIZ-FM and WZVL and the 2.0 mV/m contour of WHIZ. The 60 dBu contour of WWCD does not reach the community of license of WHIZ-TV. However, the contour of WHIZ-TV encompasses the community of license of WWCD, which implicates the radio/TV cross ownership rules. Pursuant to §73.3555(c)(2)(B)(ii), if a minimum of 10 independently owned media voices remain in the market after the transfer of control, control of up to two commercial TV stations and four commercial radio stations is allowed. As noted on Exhibit #1 there are 47 radio stations in the Columbus, Ohio Arbitron Market. Therefore, Litticks's control of WHIZ-TV and WWCD in the same market is in compliance with the Commission's radio/TV cross ownership rules.

7. As noted on Exhibit #5, the community of license of WHIZ-TV is encompassed by the 60 dBu contours of WHIZ-FM and WZVL and by the 2.0 mV/m contour of WHIZ and the communities of license of the three radio stations are each encompassed by the TV station contour. The locations of these contours implicates the radio/TV cross ownership rules. Pursuant to §73.3555(c)(2)(B)(ii) as noted above, Littick can control WHIZ-TV and the three

radio stations in the Zanesville market. Since these three radio stations are not in an Arbitron Market, §73.3555 (c)(3)(ii)(C) states that the number of radio stations present in the “Radio Market” defined by the contours of the subject stations can be used to demonstrate there are a sufficient number of media voices in the market. Exhibit #4 is a tabulation of the radio stations in the radio market consisting of WHIZ, WHIZ-FM and WZVL and lists 19 stations as being in the market. In addition, the area is served by the daily newspaper, Zanesville Times Recorder, and by Time Warner Cable. Therefore, Litticks’s control of WHIZ-TV and WHIZ, WHIZ-FM and WZVL in the same market is in compliance with the Commission’s radio/TV cross ownership rules.

8. The foregoing technical statement was prepared on behalf of Henry C. Littick by Graham Brock, Inc., his Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.6. BIA database. Technical data related to AM and FM facilities was extracted from the Commission’s CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

FCC Geographic Market Definition for Columbus, OH

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WBNS	AM	1460	C	Sports	Columbus, OH	07/02/2003	35	RadiOhio Inc	Columbus, OH	Franklin
WBNS	FM	97.1	C	Sports	Columbus, OH	07/02/2003	35	RadiOhio Inc	Columbus, OH	Franklin
WBWR	FM	105.7	C	Rock	Columbus, OH	07/02/2003	35	Clear Channel Communications Inc	Hilliard, OH	Franklin
WCBE	FM	90.5	NC	News/Altve	Columbus, OH	07/02/2003	35	Columbus City School District	Columbus, OH	Franklin
WCGX	FM	106.7	C	Alternative	Columbus, OH	05/05/2008	35	Clear Channel Communications Inc	Dublin, OH	Franklin
WCKX	FM	107.5	C	Urban	Columbus, OH	07/02/2003	35	Radio One Inc	Columbus, OH	Franklin
WCLT	AM	1430	C	Nws/Tlk/Spt	Columbus, OH	07/02/2003	35	WCLT Radio Inc	Newark, OH	Licking
WCLT	FM	100.3	C	Country	Columbus, OH	07/02/2003	35	WCLT Radio Inc	Newark, OH	Licking
WCOL	FM	92.3	C	Country	Columbus, OH	07/02/2003	35	Clear Channel Communications Inc	Columbus, OH	Franklin
WCVO	FM	104.9	C	ChrsContem	Columbus, OH	07/02/2003	35	One Connection Media Group	Gahanna, OH	Franklin
WDLR	AM	1550	C	Mexican	Columbus, OH	07/02/2003	35	ICS Holdings Inc	Delaware, OH	Delaware
WDUB	FM	91.1	NC	AOR	Columbus, OH	07/02/2003	35	Denison University	Granville, OH	Licking
WFCO	FM	90.9	NC	Inspiration	Columbus, OH	07/02/2003	35	Lancaster Education Broadcasting Foundation	Lancaster, OH	Fairfield
WHKC	FM	91.5	NC	Chrst/Talk	Columbus, OH	12/19/2006	35	Christian Broadcasting Services Inc	Columbus, OH	Franklin
WHOK	FM	107.1	C	Country	Columbus, OH	07/02/2003	35	Wilks Broadcast Group LLC	Circleville, OH	Pickaway
WHTH	AM	790	C	Talk	Columbus, OH	07/02/2003	35	Runnymede Corp	Heath, OH	Licking
WJJE	FM	89.1	NC	Talk	Columbus, OH	10/27/2003	35	American Family Association Incorporated	Delaware, OH	Delaware
WLOH	AM	1320	C	Talk/News	Columbus, OH	07/02/2003	35	WLOH Radio Company	Lancaster, OH	Fairfield
WLRY	FM	88.9	NC	ChrsContem	Columbus, OH	07/02/2003	35	Arcangel Broadcasting Foundation	Rushville, OH	Fairfield
WLVQ	FM	96.3	C	AOR/CIRck	Columbus, OH	07/02/2003	35	Wilks Broadcast Group LLC	Columbus, OH	Franklin
WMNI	AM	920	C	News	Columbus, OH	07/02/2003	35	North American Broadcasting Company	Columbus, OH	Franklin
WMNI	FM	103.9	C	News	Columbus, OH	07/02/2003	35	North American Broadcasting Company	Westerville, OH	Franklin
WNCI	FM	97.9	C	CHR	Columbus, OH	07/02/2003	35	Clear Channel Communications Inc	Columbus, OH	Franklin
WNKO	FM	101.7	C	Clsc Hits	Columbus, OH	07/02/2003	35	Runnymede Corp	New Albany, OH	Franklin
WNND	FM	103.5	C	Clsc Hits	Columbus, OH	07/02/2003	35	Saga Communications Inc	Pickerington, OH	Fairfield
WNNP	FM	104.3	C	Clsc Hits	Columbus, OH	07/02/2003	35	Saga Communications Inc	Richwood, OH	Union
WOBN	FM	97.5	NC	Variety	Columbus, OH	07/02/2003	35	Otterbein College	Westerville, OH	Franklin
WODC	FM	93.3	C	Oldies	Columbus, OH	07/02/2003	35	Clear Channel Communications Inc	Ashville, OH	Pickaway
WOSA	FM	101.1	NC	Classical	Columbus, OH	10/05/2006	35	Ohio State University	Grove City, OH	Franklin
WOSU	FM	89.7	NC	NPR/News	Columbus, OH	07/02/2003	35	Ohio State University	Columbus, OH	Franklin
WQTT	AM	1270	C	Oldies	Columbus, OH	07/02/2003	35	ICS Holdings Inc	Marysville, OH	Union
WRFD	AM	880	C	Chrst/Talk	Columbus, OH	07/02/2003	35	Salem Communications Corporation	Columbus-Worthington, OH	Franklin
WRKZ	FM	99.7	C	Rock	Columbus, OH	07/02/2003	35	North American Broadcasting Company	Columbus, OH	Franklin
WSNY	FM	94.7	C	Lite Rock	Columbus, OH	07/02/2003	35	Saga Communications Inc	Columbus, OH	Franklin

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

"p" indicates pending sale to owner listed

FCC Geographic Market Definition for Columbus, OH

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WTOH	FM	98.9	C	News/Talk	Columbus, OH	07/02/2003	35	Salem Communications Corporation	Upper Arlington, OH	Franklin
WTVN	AM	610	C	News/Talk	Columbus, OH	07/02/2003	35	Clear Channel Communications Inc	Columbus, OH	Franklin
WUFM	FM	88.7	NC	New Rock	Columbus, OH	07/02/2003	35	Spirit Communications Inc	Columbus, OH	Franklin
WWKO	AM	1580	C	Talk	Columbus, OH	07/02/2003	35	RL Transition Corp	Columbus, OH	Franklin
WWKO	FM	103.1	C	Mexcn/Varty	Columbus, OH	07/02/2003	35	RL Transition Corp	Johnstown, OH	Licking
WVMX	FM	107.9	C	Hot AC	Columbus, OH	07/02/2003	35	Saga Communications Inc	Westerville, OH	Franklin
WVSG	AM	820	NC	Relgn/Talk	Columbus, OH	07/02/2003	35	St Gabriel Radio Inc	Columbus, OH	Franklin
WWCD	FM	102.5	C	Alternative	Columbus, OH	07/02/2003	35	Southeastern Ohio Television System	Baltimore, OH	Fairfield
WWGV	FM	88.1	NC	Talk	Columbus, OH	11/04/2008	35	American Family Association Incorporated	Grove City, OH	Franklin
WXMG	FM	106.3	C	R&B Oldies	Columbus, OH	07/02/2003	35	Radio One Inc	London, OH	Madison
WYTS	AM	1230	C	Sports	Columbus, OH	07/02/2003	35	Clear Channel Communications Inc	Columbus, OH	Franklin
WZNP	FM	89.3	NC	ChrsContem	Columbus, OH	08/15/2008	35	One Connection Media Group	Newark, OH	Licking
WZOH	FM	95.5	C	Sports	Columbus, OH	07/02/2003	35	Wilks Broadcast Group LLC	Lancaster, OH	Fairfield

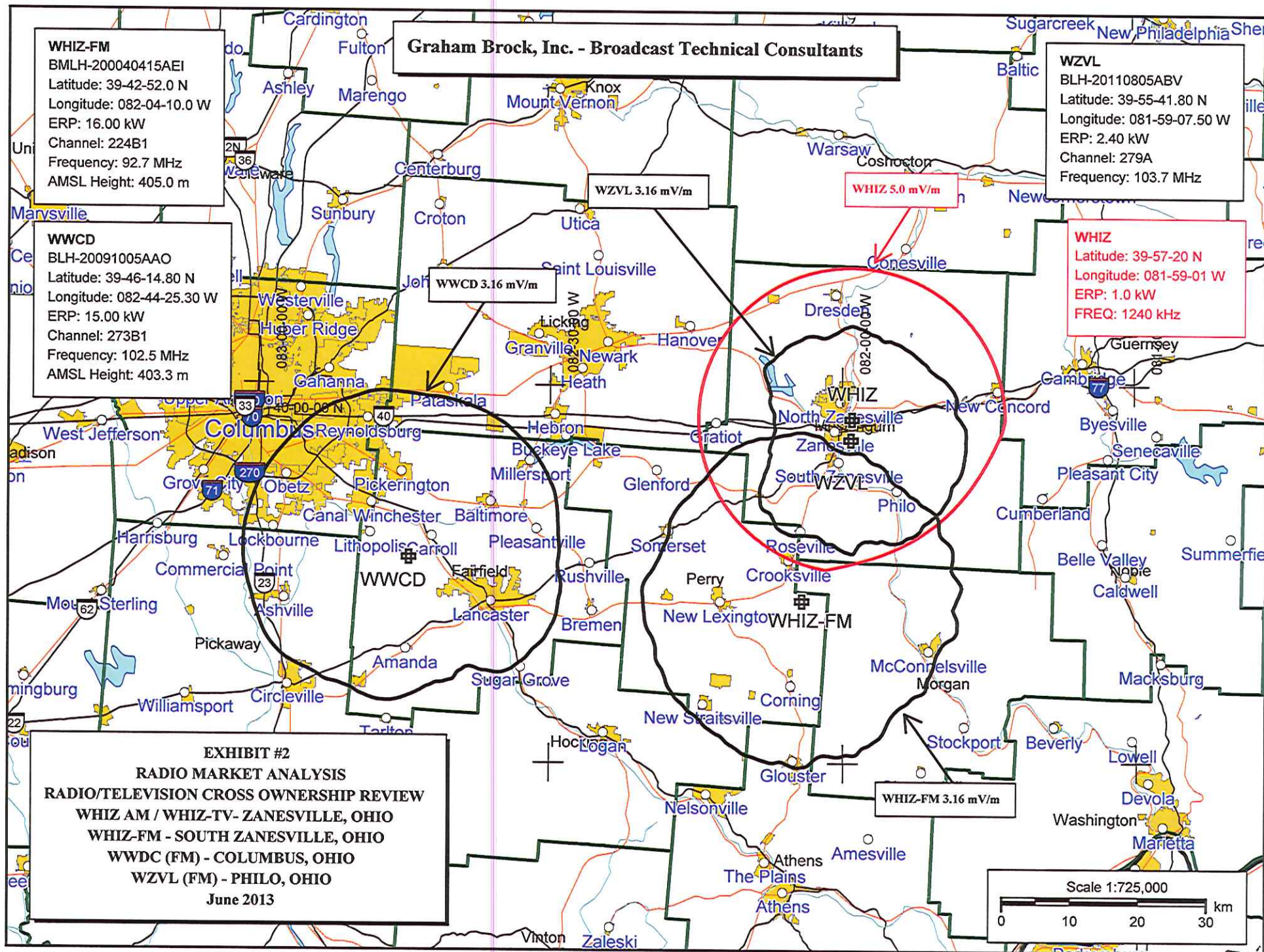
Number of Stations in Geographic Market 47

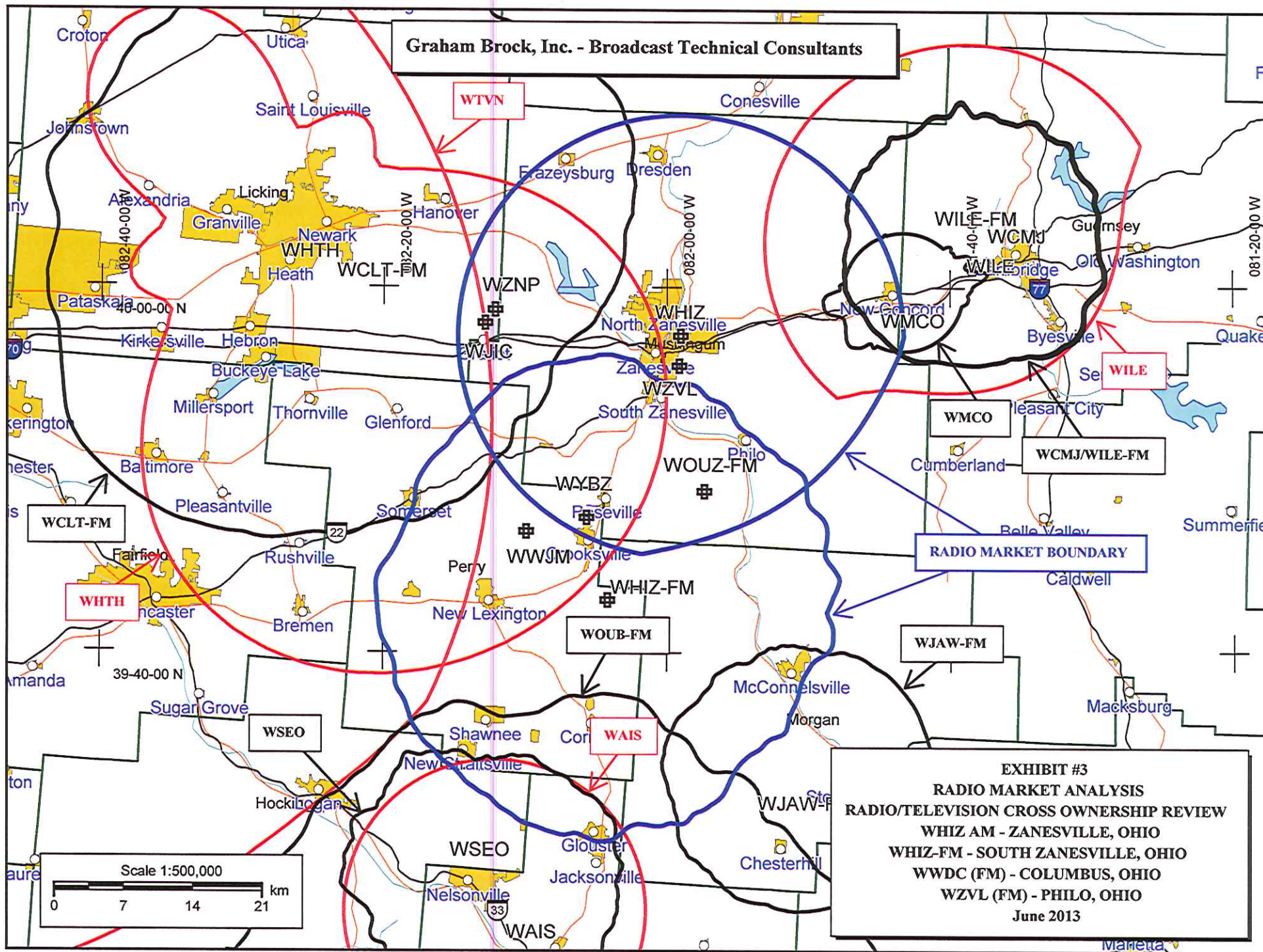
Previous Stations in Geographic Market

WKKJ	FM	94.3	C	Country		09/08/2010	0	Clear Channel Communications Inc	Chillicothe, OH	Ross
WQIO	FM	93.7	C	AC		06/08/2012	0	BAS Broadcasting Inc	Mount Vernon, OH	Knox

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

"p" indicates pending sale to owner listed





RADIO MARKET ANALYSIS
RADIO/TELEVISION CROSS OWNERSHIP REVIEW
WHIZ AM / WHIZ-TV - ZANESVILLE, OHIO
WHIZ-FM - SOUTH ZANESVILLE, OHIO
WWDC (FM) - COLUMBUS, OHIO
WZVL (FM) - PHILO, OHIO
June 2013

EXHIBIT #4

Tabulation of Stations in Radio Market

AM Stations

+	WTVN	610 kHz	Columbus, Ohio
+	WAIS	770 kHz	Buchtel, Ohio
+	WHTH	790 kHz	Heath, Ohio
*	WHIZ	1240 kHz	Zanesville, Ohio
+	WILE	1270 kHz	Cambridge, Ohio

Total AM Stations - 5

FM Stations

	WZNP	Ch 207A	Newark, Ohio
	WOUZ-FM	Ch 211A	Zanesville, Ohio
+	WMCO	Ch 214A	New Concord, Ohio
+	WOUB-FM	Ch 217B	Athens, Ohio
	WJIC	Ch 219A	Zanesville, Ohio
*	WHIZ-FM	Ch 224B1	South Zanesville, Ohio
+	WCMJ	Ch 244A	Cambridge, Ohio
+	WILE-FM	Ch 249A	Byesville, Ohio
+	WCLT-FM	Ch 262B	Newark, Ohio
+	WJAW-FM	Ch 265A	McConnelsville, Ohio
*	WZVL	Ch 279A	Philo, Ohio
	WWJM	Ch 290A	New Lexington, Ohio
	WYBZ	Ch 297A	Crooksville, Ohio
+	WSEO	Ch 299A	Nelsonville, Ohio

Total FM Stations - 14

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 19

- * Subject station.
- + Station providing service to Radio Market.

Graham Brock, Inc. - Broadcast Technical Consultants

WWCD
BLH-20091005AAO
Latitude: 39-46-14.80 N
Longitude: 082-44-25.30 W
ERP: 15.00 kW
Channel: 273B1
Frequency: 102.5 MHz
AMSL Height: 403.3 m

WWCD
BLH-20091005AAO
Latitude: 39-46-14.80 N
Longitude: 082-44-25.30 W
ERP: 15.00 kW
Channel: 273B1
Frequency: 102.5 MHz
AMSL Height: 403.3 m

WHIZ-FM
BMLH-200040415AEI
Latitude: 39-42-52.0 N
Longitude: 082-04-10.0 W
ERP: 16.00 kW
Channel: 224B1
Frequency: 92.7 MHz
AMSL Height: 405.0 m

WHIZ-TV-D
BLCDD-20080222AAV
Latitude: 39-55-42 N
Longitude: 081-59-07 W
ERP: 620.00 kW
Channel: 40
Frequency: 629.0 MHz
AMSL Height: 422.4 m

WZVL
Latitude: 39-55-41.8 N
Longitude: 081-59-07.5 W
ERP: 1.0 kW
FREQ: 1240 kHz

WZVL 1.0 mV/m

WHIZ 2.0 mV/m

WWCD 1.0 mV/m

WHIZ-TV

WZVL

WHIZ-FM

WHIZ-FM 1.0 mV/m

EXHIBIT #5
RADIO MARKET ANALYSIS
RADIO/TELEVISION CROSS OWNERSHIP REVIEW
WHIZ AM / WHIZ-TV - ZANESVILLE, OHIO
WHIZ-FM - SOUTH ZANESVILLE, OHIO
WWDC (FM) - COLUMBUS, OHIO
WZVL (FM) - PHILO, OHIO
June 2013

