

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

VERNON SMITH

This radio multiple ownership analysis was prepared to consider common ownership of the stations tabulated below under the FCC “Interim” contour analysis method.^{*} Vernon Smith has ownership interests in the two stations tabulated below, therefore the following stations were considered under proposed ownership or control:

Call Sign / Facility ID	Location	Facilities
WHLG/27674	Port St. Lucie, FL	Channel 267A 6 kW 91 m
WFLM/42065	White City, FL	Channel 284C3 17.5 kW 119 m

The principal community contours of these two stations are depicted on a map included herein as Figure 1. Since these stations have overlapping principal community contours (3.16 mV/m for FM stations), 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. The table below lists the defined market:

^{*} See *Report and Order and Notice of Proposed Rulemaking*, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

[†] 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).

Defined Radio	Stations that Define Radio Market	
Market	AM Stations	FM Stations
Market 1	--	WHLG, WFLM

Count of Stations in Defined Market

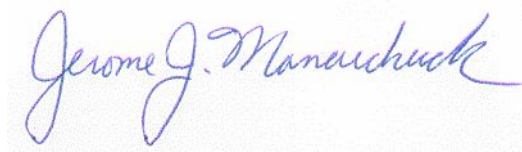
The number of other radio stations in a “radio market” is determined by counting the operating stations having principal community contours that intersect the principal community contours which define the radio market. Only those stations located within 92 kilometers of the perimeter of the mutual overlap area of the respective defined market area were employed in the count of the stations. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	8 AM, 21 FM; Total 29

Figure 2 is a tabulation of the radio stations identified in the defined radio market tabulated above. 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 NGDC 30-second computer database for each of the FM stations using radials evenly-spaced every 10 degrees of azimuth.

Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.

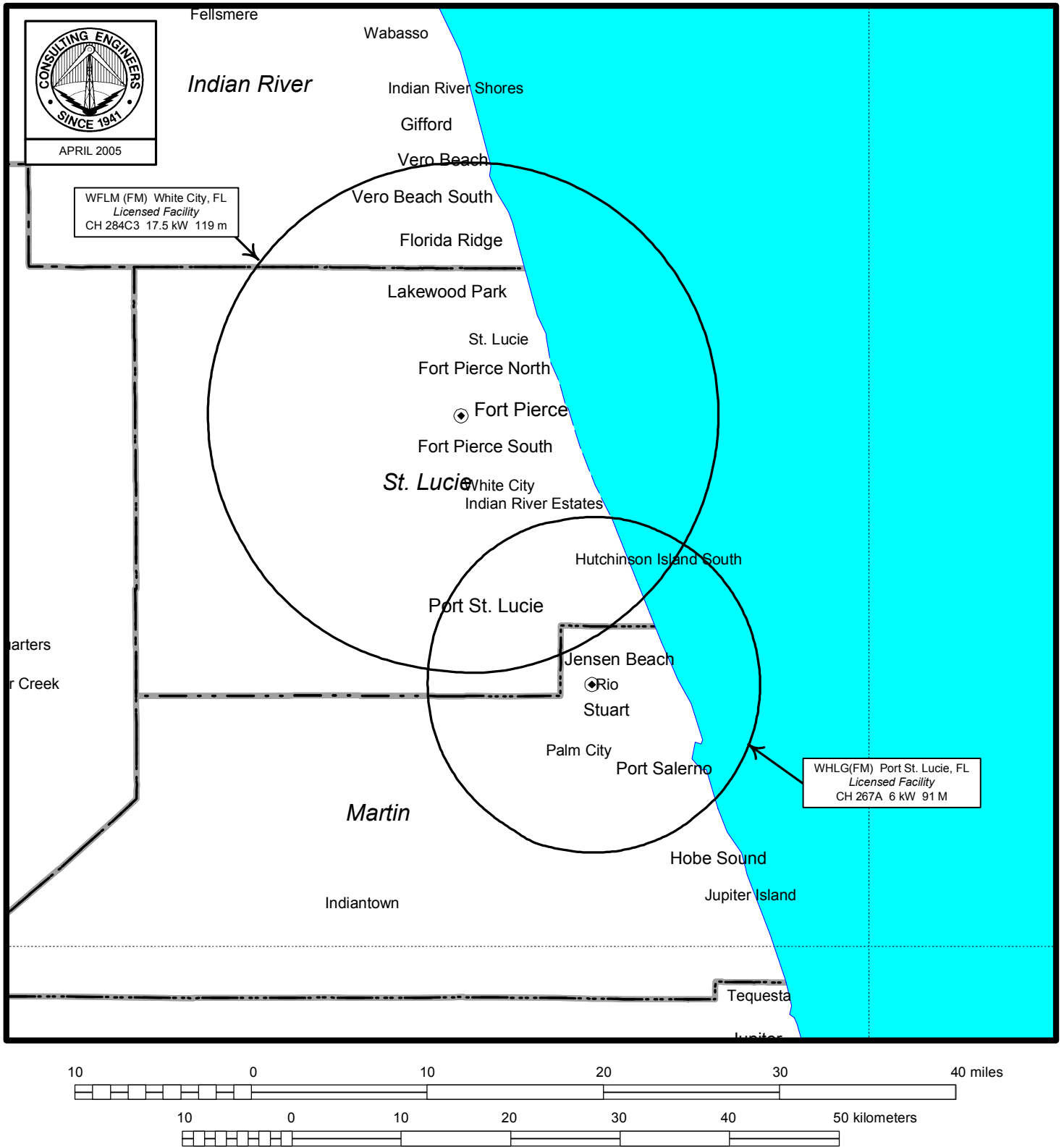


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Figure 1



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

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

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

VERNON SMITH

Tabulation of Other Stations Defined in Radio Market 1

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
WEFL	TEQUESTA	FL	760 kHz
WJBW	JUPITER	FL	1000
WJNX	FORT PIERCE	FL	1330
WZTA	VERO BEACH	FL	1370
WIRA	FORT PIERCE	FL	1400
WSTU	STUART	FL	1450
WTTB	VERO BEACH	FL	1490
WPSL	PORT ST. LUCIE	FL	1590
WQCS	FORT PIERCE	FL	88.9 MHz
WCNO	PALM CITY	FL	89.9
WJFP	FORT PIERCE	FL	91.1
WWFR	STUART	FL	91.7
WSCF-FM	VERO BEACH	FL	91.9
WAVW	STUART	FL	92.7
WGYL	VERO BEACH	FL	93.7
WSYR-FM	GIFFORD	FL	94.7
WLDI	FORT PIERCE	FL	95.5
WOSN	INDIAN RIVER SHORES	FL	97.1
WRMF	PALM BEACH	FL	97.9
WKGR	FORT PIERCE	FL	98.7
WGNX	VERO BEACH	FL	99.7
WCZR	VERO BEACH	FL	101.7
WMBX	JENSEN BEACH	FL	102.3
WPBZ	INDIANTOWN	FL	103.1
WQOL	VERO BEACH	FL	103.7
WEAT-FM	WEST PALM BEACH	FL	104.3
WIRK-FM	WEST PALM BEACH	FL	107.9