

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS AND
RADIO-TELEVISION CROSS OWNERSHIP ANALYSIS

LE SEA BROADCASTING CORPORATION

This radio multiple ownership analysis and radio-television cross ownership analysis was prepared on behalf of Le Sea Broadcasting Corporation concerning stations in the South Bend, Indiana region. In conjunction with the proposed acquisition, the following radio stations are to be considered under present or proposed common ownership or control:

Call Sign / Facility ID	Location	Facilities
WHME(FM) 37149	South Bend, IN	Channel 276A, 3 kW, 91 m
Proposed WHPZ(FM)	Bremen, IN	Channel 245A, 5.4 kW, 105 m

The principal community contours of all of these stations are depicted on a map included herein as Figure 1. The radio multiple ownership analysis considers only those stations with 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 Markets

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:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	-----	WHME(FM), Proposed WHPZ(FM)

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating, commercial stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject stations to be co-owned. Only those stations having principal community contour overlap with the defined market area were employed in the count of stations. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	4 AM, 9 FM; 13 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio market. Only known licensed, operating, commercial stations were employed for the study. It is noted that there are at least 13 stations within the defined radio market.

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 U.S.G.S. 3-second computer database for each of the FM stations using radials evenly-spaced every 10 degrees of azimuth.

* 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).

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.

Radio-Television Cross Ownership

In conjunction with FM station WHME(FM) and the proposed WHPZ(FM) operation, the following television station is to be considered under present or proposed common ownership or control:

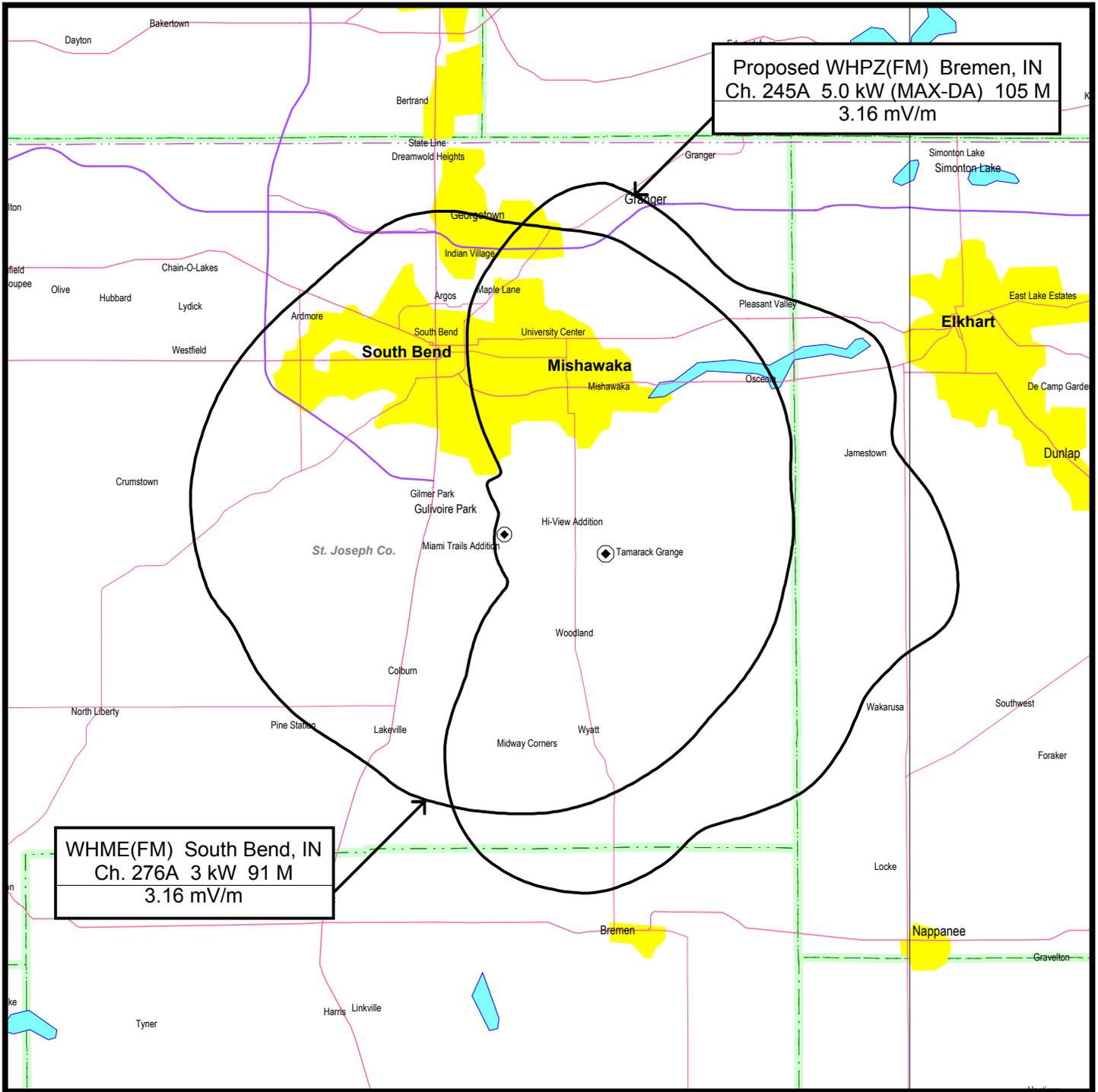
Call Sign / Facility ID	Location	Facilities
WHME-TV 36117	South Bend, IN	Channel 46, 1120 kW, 305 m

The attached Figure 3 is a map depicting the FCC predicted Grade A contour of WHME-TV; and the predicted 60 dBu contours of WHME(FM) and WHPZ(FM) (both licensed and proposed operations). Also shown are the city limits of South Bend and Bremen. As can be seen from Figure 3, the proposed WHPZ(FM) operation will not change the number of FM and TV stations Le Sea Broadcasting will own or control in the market.


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PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

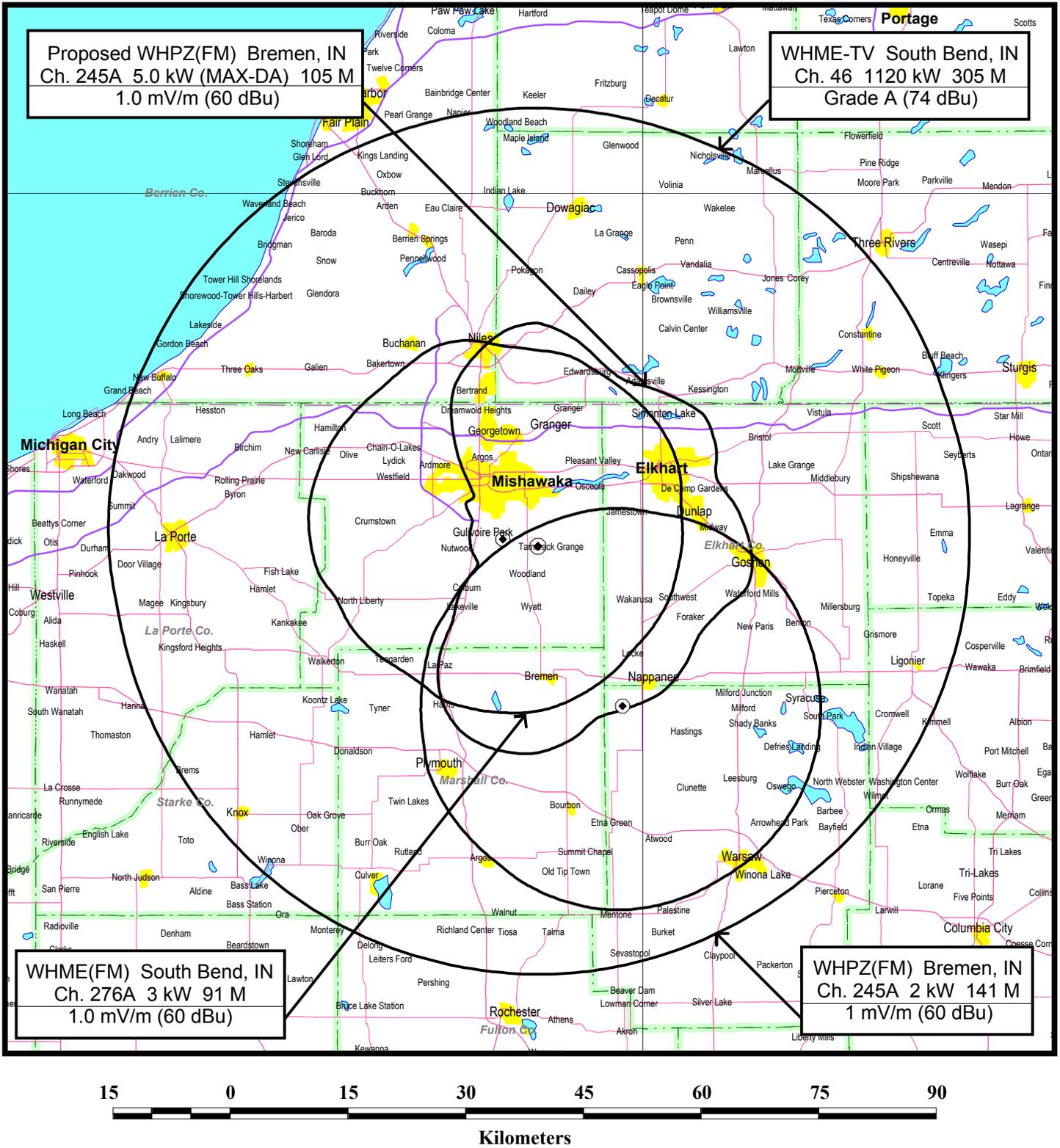
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RADIO MULTIPLE OWNERSHIP ANALYSIS
SOUTH BEND, INDIANA

Tabulation of Stations in Radio Market

Market 1	
Number	Station
AM Stations	
1	WDND, SOUTH BEND, IN, 1620 kHz
2	WSBT, SOUTH BEND, IN, 960 kHz
3	WHLY, SOUTH BEND, IN, 1580 kHz
4	WNDV, SOUTH BEND, IN, 1490 kHz
FM Stations	
1	WNDV-FM, SOUTH BEND, IN, Channel 225
2	WBYT, ELKHART, IN, Channel 264
3	WUBU, SOUTH BEND, IN, Channel 292
4	WZOC, PLYMOUTH, IN, Channel 232
5	WNSN, SOUTH BEND, IN, Channel 268
6	WRBR-FM, SOUTH BEND, IN, Channel 280
7	WGTC, NEW CARLISLE, IN, Channel 272
8	WHME, SOUTH BEND, IN, Channel 276
9	PROPOSED WHPZ, BREMEN, IN, Channel 245

Figure 3



RADIO-TV CROSS OWNERSHIP EXHIBIT

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