

**RADIO MARKET ANALYSIS
MITTEN MEDIA, LLC.
WKLA-FM – LUDINGTON, MI
WMTE-FM – MANISTEE, MI**

**DECEMBER 2015
TECHNICAL STATEMENT**

This Technical Statement and attached exhibits were prepared on behalf of Mitten Media, LLC. (“Mitten”), licensee of WKLA-FM, Ludington, MI. As Mitten is in the process of acquiring WMTE-FM Manistee, MI, a radio market analysis is needed. Neither of these stations are considered to be ‘home’ to any Nielsen rated market. Therefore, a review based on the modified contour overlap rules has been undertaken.

The overlap of contours between commonly held stations results in one distinct radio market. This market consists of FM stations WKLA-FM, and WMTE-FM. Therefore, a study has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission’s rules. The contours of the relevant subject stations in the markets under study will be used to define the market boundary, hereinafter referred to as the “Radio Market”. The study will determine the number of other AM and FM stations that either have transmitter sites within, or provide coverage to, the Radio Market. Only those stations with transmitter sites within 92.0 kilometers will be considered as contributors to the market.

Exhibit #1 is a depiction of the stations within, or providing service to, the Radio Market boundary. A total of twelve stations is depicted, including the two subject stations. This falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At the fourteen and fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible, provided the number of stations to be commonly held does not exceed 50% of the stations in the market. Based on Mitten’s interest in WKLA-FM, and WMTE-FM, this Market is in compliance with the Commission’s multiple ownership rules.

Exhibit #1: Radio Market

