

**RADIO MARKET ANALYSIS**  
**COMMONWEALTH BROADCASTING, LLC**  
**WEXM (FM) RADIO STATION**  
**EXMORE, VIRGINIA**  
**April 2001**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Commonwealth Broadcasting, LLC ( CB ), proposed assignee of radio station WEXM, Channel 291B1, Exmore, Virginia.<sup>1</sup> CB also has attributable interests in the license of WROX-FM, Channel 241B, Cape Charles, Virginia; WKOC, Channel 229C1, Chesapeake, Virginia; WNIS, 790 kHz, Norfolk, Virginia; and WTAR, 850 kHz, Norfolk, Virginia.<sup>2</sup> The 3.16 mV/m contours of WEXM and WROX-FM overlap. The 5.0 mV/m contour of WTAR overlaps with the 3.16 mV/m contours of both WEXM and WROX-FM. This results in CB having attributable interests in two FM facilities and one AM facility in the same market. Exhibit #1 is a map depicting the subject stations.

2. A study has, therefore, been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. The city grade contours of the three subject stations, therefore, establish the market boundary, hereinafter referred to as the "Radio Market". The study will determine the number of other commercial AM and FM stations which either have transmitter sites within the subject radio market, or have principal community contour overlap with the subject stations.

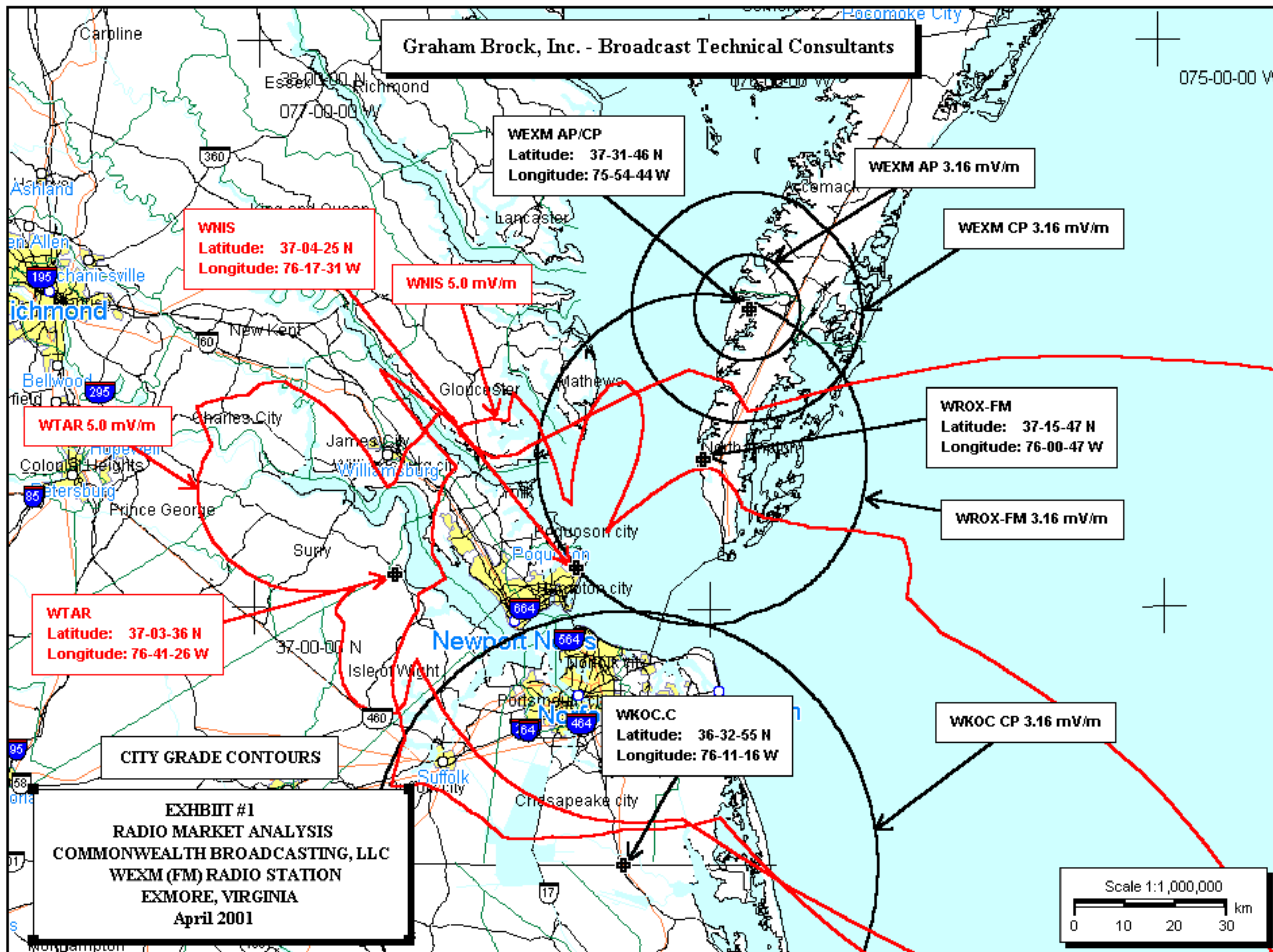
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- 1) In addition to the outstanding construction permit for WEXM, an amended application proposing operation on Channel 291A with an effective radiated power of 1.5 kilowatts at 81 meters HAAT is pending. It is the Class A facility which will become operational at Exmore, rather than the outstanding Class B1 permit.
- 2) WKOC is presently operating under automatic program tests with the facilities authorized in BPH-20000502AAV.

3. Exhibit #2 is a depiction of the Radio Market with the transmitter sites or city grade contours of eight commercial AM and FM stations, including the subject stations. Exhibit #3 is a tabulation of the stations in the radio market. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules.<sup>3</sup> At the fourteen or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible (provided one party does not control more than 50% of the stations in the subject market). Therefore, CB s interests in two FM stations and one AM station in the same radio market are in compliance with the Commission's rules. Therefore, CB s proposed ownership of WEXM is in compliance with §73.3555 of the rules.

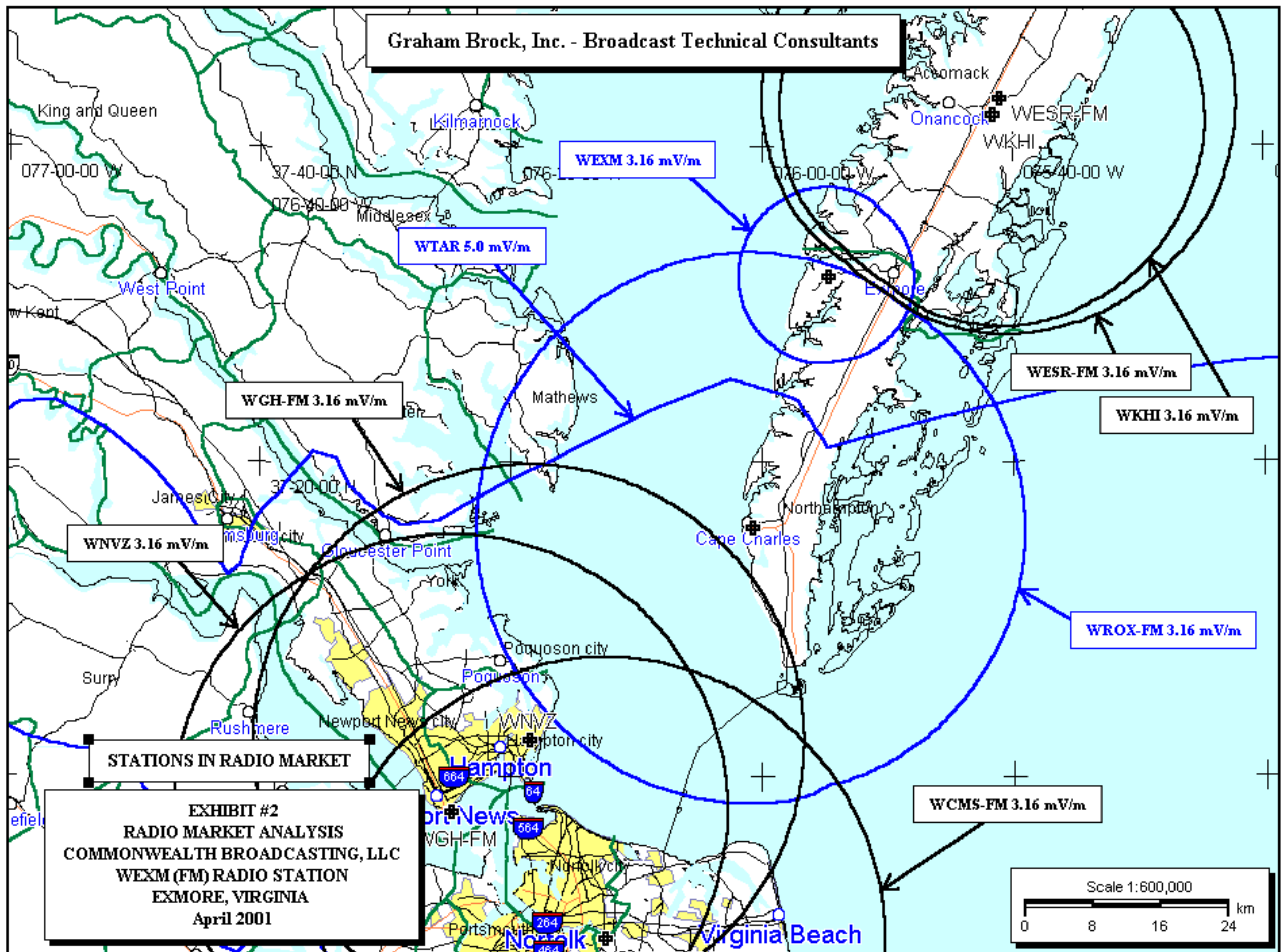
4. The foregoing technical statement was prepared on behalf of Commonwealth Broadcasting, LLC, by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

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3) Although there are additional stations providing service to the Radio Market, they are not considered since the number of stations was ample to demonstrate compliance with the rules based on the number of stations proposed to be commonly owned.



Graham Brock, Inc. - Broadcast Technical Consultants



STATIONS IN RADIO MARKET

EXHIBIT #2  
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**EXHIBIT #3**

**Tabulation of Stations in Radio Market**

**AM Stations**

|        |         |             |
|--------|---------|-------------|
| * WTAR | 850 kHz | Norfolk, VA |
|--------|---------|-------------|

Total AM Stations - 1

**FM Stations**

|           |          |                    |
|-----------|----------|--------------------|
| * WROX-FM | Ch 241B  | Cape Charles, VA   |
| + WGH-FM  | Ch 247B  | Newport News, VA   |
| + WCMS-FM | Ch 263B  | Norfolk, VA        |
| + WESR-FM | Ch 277B  | Onley-Onancock, VA |
| + WNVZ    | Ch 283B  | Norfolk, VA        |
| * WEXM    | Ch 291B1 | Exmore, VA         |
| + WKHI    | Ch 298B  | Exmore, VA         |

Total FM Stations - 7

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 8**

- \* Subject station
- + City grade contour provides service to Radio Market