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## **MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS**

**Prepared for  
Synergy Media, Inc.  
August 2016**

The attached analysis of compliance with the radio multiple ownership rules was prepared in accordance with the Rules and Regulations of the Federal Communications Commission, in connection with an application for assignment of the original construction permit for FM station WKLA-FM at Ludington, Michigan (FCC Facility ID #191495) from WGHN, Inc. to Synergy Media, Inc. ("Synergy").

### **Unrated Market**

WKLA-FM will operate outside any Nielsen rated market, but the authorized facility has principal community contour overlap with the following stations which are attributable to Synergy:

WWKR	231C3	Hart
WLDN	254A	Ludington
WKZC	235C3	Scottville
WKLA	1450 kHz	Ludington

Synergy also owns FM station WMLQ 249A Manistee, in the general vicinity. As is depicted on the attached overview map, however, WKLA-FM does not have principal community contour overlap with WMLQ, and so no further consideration of WMLQ is required as a part of this analysis.

These stations operate outside any market rated by Nielsen. Therefore, analysis has been made consistent with the Commission's interim rules for unrated markets. The 70 dBu contours of FM stations were determined from the technical data contained in the most recent edition of the FCC FM Database. The listed antenna height above average terrain was used together with topographic data obtained from the digitized 30 second or 3 second database. The 5 mV/m daytime contours of AM stations were determined from the technical data contained in the most recent edition of the FCC AM Database. The listed antenna parameter information was used together with a digitized version of the FCC M-3 or Region II ground conductivity database.

The service contours were plotted using correct map projection mathematics. Those stations whose transmitter sites are within the respective principal community service contours of the stations proposed to be commonly owned have only the sites rather than their contours shown. All contours and enclosed transmitter site locations have been labeled. A list of all stations considered is included with this statement.

The attached overview map demonstrates that the WKLA-FM facility forms two discrete clusters with the other attributable stations in the area. In counting stations providing service to the "market" defined by each of the discrete clusters formed in unrated markets, stations whose transmitter sites are located in excess of 92 km from the perimeter of the common overlap area have been excluded, as have other stations to be commonly-owned but which are not a part of the discrete cluster being studied.

**Cluster A: WKLA-FM, WWKR(FM), WLDN(FM), WKZC(FM)**

This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets. In order to qualify for common ownership of this 0AM/4FM cluster, there must be at least 15 stations in the relevant "market". This study demonstrates that there are 17 stations in the relevant market.

**Cluster B: WKLA-FM, WLDN(FM), WKZC(FM), WKLA(AM)**

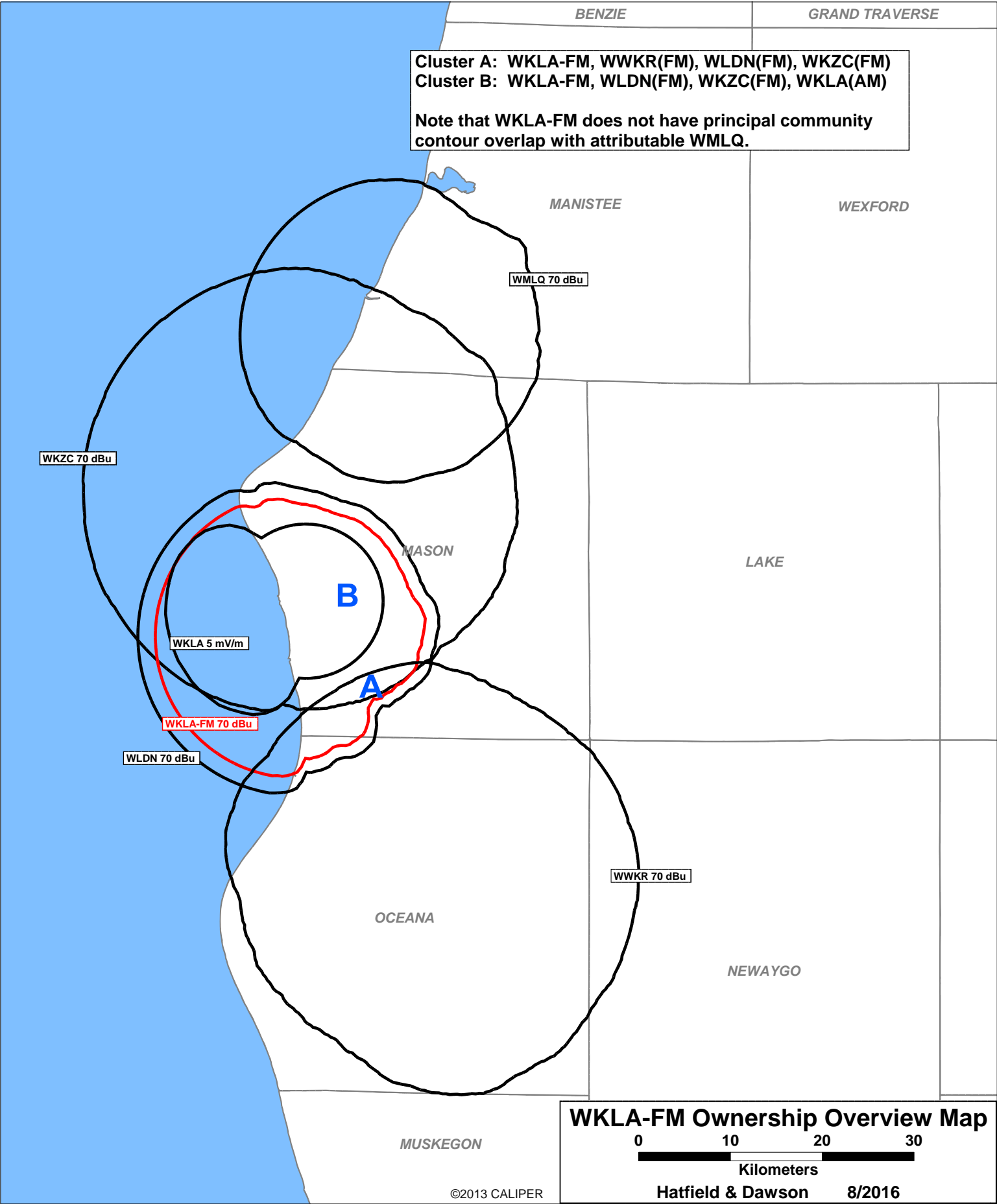
This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets. In order to

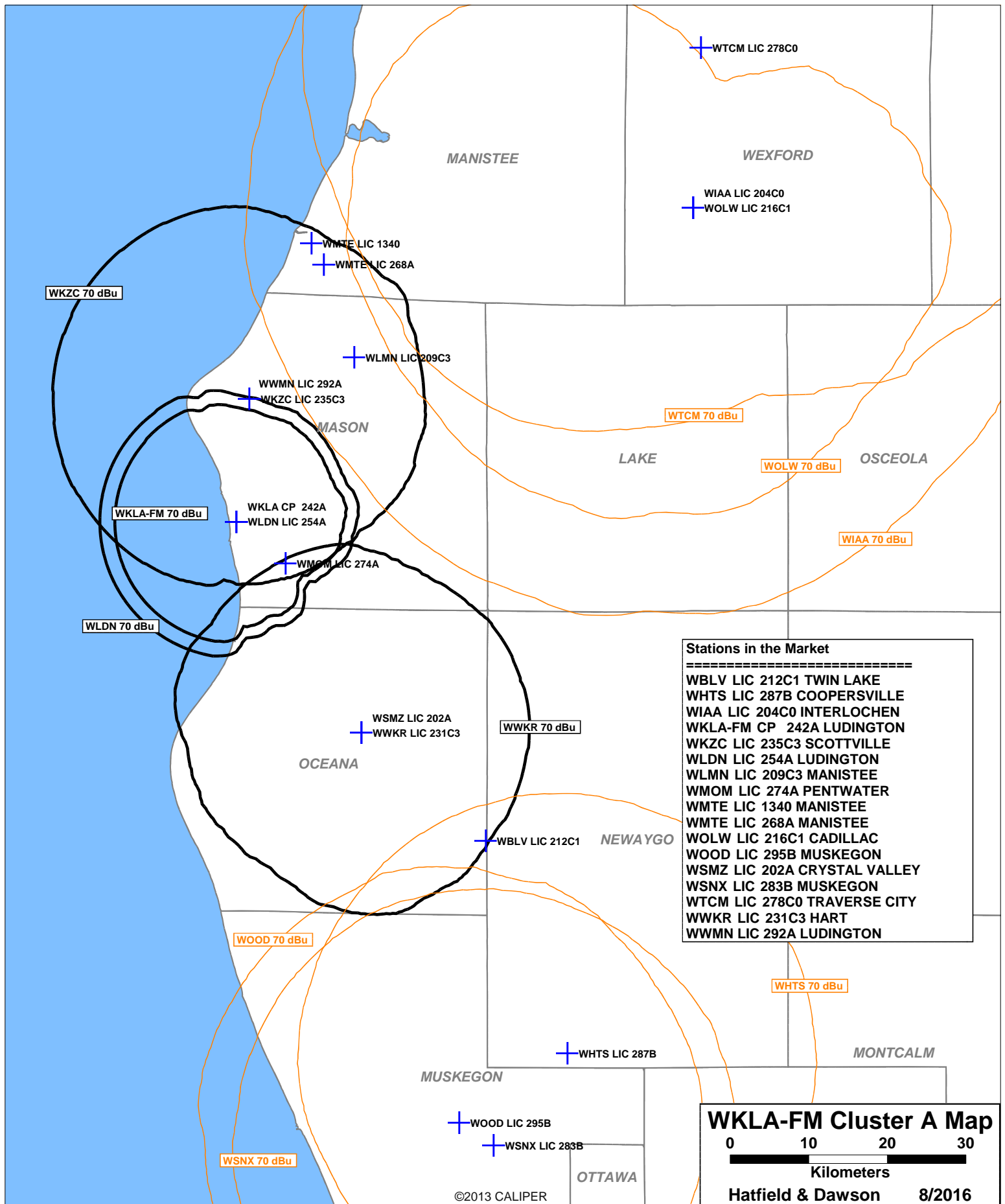
qualify for common ownership of this 1AM/3FM cluster, there must be at least 8 stations in the relevant "market". This study demonstrates that there are 14 stations in the relevant market.

August 15, 2016

A handwritten signature in black ink, appearing to read "Erik C. Swanson". The signature is fluid and cursive, with the first name "Erik" and last name "Swanson" clearly distinguishable.

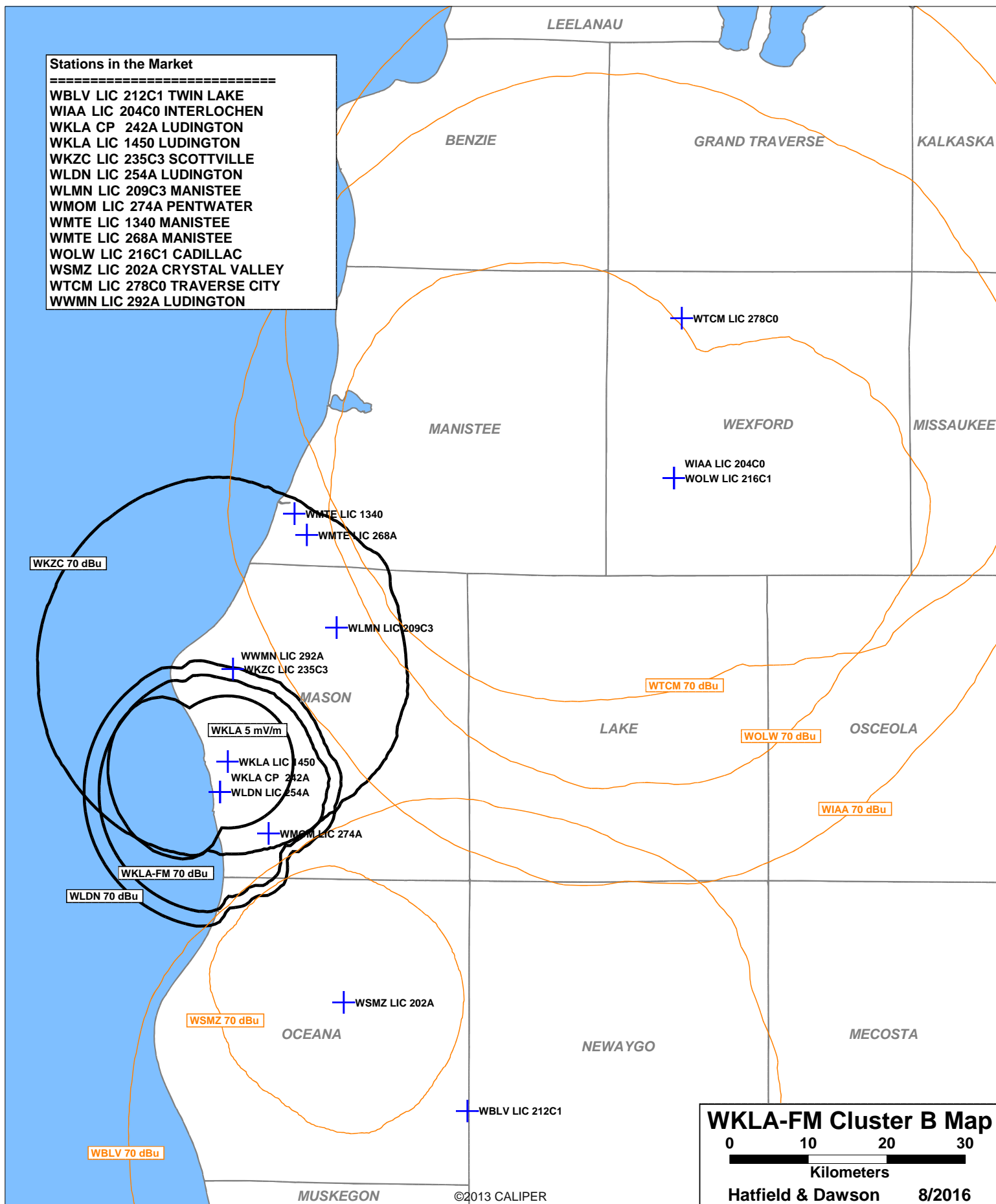
Erik C. Swanson





# Stations in the Market

WBLV LIC 212C1 TWIN LAKE  
 WIAA LIC 204C0 INTERLOCHEN  
 WKLA CP 242A LUDINGTON  
 WKLA LIC 1450 LUDINGTON  
 WKZC LIC 235C3 SCOTTVILLE  
 WLDN LIC 254A LUDINGTON  
 WLMN LIC 209C3 MANISTEE  
 WMOM LIC 274A PENTWATER  
 WMTE LIC 1340 MANISTEE  
 WMTE LIC 268A MANISTEE  
 WOLW LIC 216C1 CADILLAC  
 WSMZ LIC 202A CRYSTAL VALLEY  
 WTCM LIC 278C0 TRAVERSE CITY  
 WWMN LIC 292A LUDINGTON



## WKLA-FM Cluster B Map

0 10 20 30  
Kilometers

Hatfield & Dawson 8/2016