

**MULLANEY ENGINEERING, INC.**

9049 SHADY GROVE COURT  
GAITHERSBURG, MD 20877

**ENGINEERING EXHIBIT**

**METRO RADIO, INC.  
COMMON OWNERSHIP OF 3 AM RADIO STATIONS**

**CURRENT OWNERSHIP**

**WKDV (AM) MANASSAS, VA FACILITY ID 8672  
WKCW (AM) WARRENTON, VA FACILITY ID 73190**

**SEEKS TO ACQUIRE**

**WPRZ(AM) WARRENTON, VA FACILITY ID 53368**

**AUGUST 2007**

**ENGINEERING STATEMENT IN SUPPORT OF  
COMPLIANCE WITH  
RADIO DUOPOLY RULES  
FOR A NON-ARBITRON METRO MARKET**

Prepared On Behalf Of  
METRO RADIO, INC.

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**NARRATIVE STATEMENT:**

**I. General:**

This engineering statement has been prepared on behalf of Metro Radio, Inc. The purpose of this statement is to establish that the proposed common ownership of the above listed stations is in compliance with the radio duopoly rules.

Radio Station WKDV (Manassas, VA) is part of the Arbitron rated Washington market, however, Radio Stations WKCW and WPRZ (both Warrenton, VA) are not within any Arbitron rated market. As the station to be acquired (WPRZ) is not within a rated market - a non-rated market study will be utilized.

Figure 1 contains a map showing the principle community contours from all three stations (utilizing either the license facilities or construction permit facilities as appropriate).

There are no areas which simultaneously receive city grade service from more than three common stations in the same service.

Consequently, common ownership of these three stations is permissible per Section 73.3555 provided the radio market consists of **at least seven stations** (including the three under common control). The market as presented herein consists of a minimum of 22 stations as presented in Figure 2 and Table 1.

Figure 3 contains a map upon which the principal community contours have been drawn to show the common market if only the licensed facilities are used.

If only the license facilities are used then the common market is split into two separate markets - Market A and Market B as shown in Figure 3. Each market then consists of two (2) AM radio stations under common control.

There are no areas which simultaneously receive city grade service from more than two common stations in the same service.

Consequently, common ownership of these stations is permissible per Section 73.3555 provided the radio market consists of **at least five stations** (including the two in each market under common control). The market as presented herein consists of a minimum of seven stations as presented in Figure 4 and Table 2.

For the sake of simplicity of presentation only a minimum amount of stations to demonstrate compliance has been provided for this study. Market B stations are already commonly owned by Metro Media, Inc.

## **II. Engineering Discussion:**

### **A. Market Definition:**

Section 73.3555 defines the "market" as the composite city grade coverage area of commonly owned facilities or proposals. The radio market is defined by the composite area generated by the 3.16 mV/M or the 70 dBu FM contours and by the 5.0 mV/m AM contours of all stations proposed to be under common control.

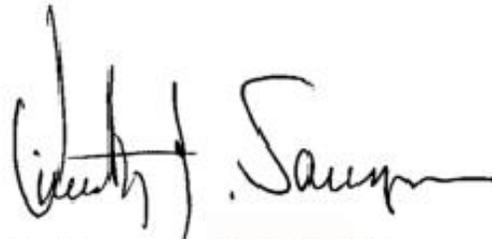
### **B. Compliance With Radio Duopoly Rules:**

The applicable section of 73.3555 permits the common ownership of these three stations (same service) provided that the radio market consists of **at least five stations** (including those stations under common ownership) when considered as two markets (using the licensed facilities) or of **at least seven stations** when using the construction permit facilities.

## **III. Summary:**

The common market OR markets formed by the proposed ownership consists of at least seven radio stations (including those proposed herein). Therefore, the proposed ownership is in full compliance with the radio duopoly rules for a non-rated market.

10 August 2007



Digitized Signature - Original ON FILE - Timothy Z. Sawyer

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NOTE: WKCW.APP AND WKCW.CP ARE INDENTICAL FACILITIES

COMBINED MARKET AREA (NON RATED MARKET)  
COMPUTED USING CP PERMITS WPRZ / WKCW  
COMPUTED USING LICENSE PERMIT WKDV

MAXIMUM OVERLAP SIGNALS 3  
5 MV/M GW DAYTIME CONTOURS

FIGURE 1

WKCW.CP  
Freq: 1420 kHz  
Class: D  
Latitude: 38-43-52 N  
Longitude: 077-46-42 W  
Power: 22 kW  
RMS: 1448.41 mV/m @1km

WKCW.APP  
Freq: 1420 kHz  
Class: D  
Latitude: 38-43-52 N  
Longitude: 077-46-42 W  
Power: 22 kW  
RMS: 1448.41 mV/m @1km

WPRZ.CP  
Freq: 1250 kHz  
Class: D  
Latitude: 38-43-52 N  
Longitude: 077-46-42 W  
Power: 8 kW  
RMS: 861.09 mV/m @1km

WKDV.LIC  
Freq: 1460 kHz  
Class: B  
Latitude: 38-45-00 N  
Longitude: 077-30-49 W  
Power: 5 kW  
RMS: 683.97 mV/m @1km

OVERLAP SERVICES  
3 COMMONLY OWNED AM STATIONS  
NUMBER IN BOXES ARE SERVICE OVERLAPS

078-00-00 W

39-00-00 N

077-30-00 W

+

38-30-00 N

+

+  
WKCW.CP  
WKCW.APP  
WPRZ.CP  
WPRZ.LIC

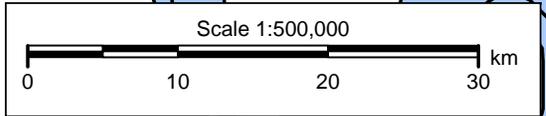
WKDV.LIC  
+

3

2

1

AM CONTOURS COMPUTED USING STANDARD M3 SOIL CONDUCTIVITIES



- WAMU
- WETA
- WKYS
- WHUR-FM
- WASH
- WMZQ-FM
- WIHT
- WBIG-FM
- WTOP-FM
- WRQX
- WGTS
- WTGB-FM
- WPER
- WINC-FM
- WWXX
- WAVA-FM
- WJZW
- WJFK-FM
- WTWP-FM
- WKCW.CP
- WKDV.LIC
- WPRZ.CP

**COMMON MARKET STUDY (NON RATED MARKET)**

LICENSED OR CP FACILITIES ONLY

WKCW CP (AM), WKDV LIC (AM), WPRZ CP (AM)

METRO RADIO INC

FIGURE 2

**MINIMUM OF 22 STATIONS SERVE THE COMMON MARKET OF 3 AM STATIONS**

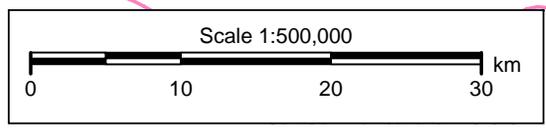
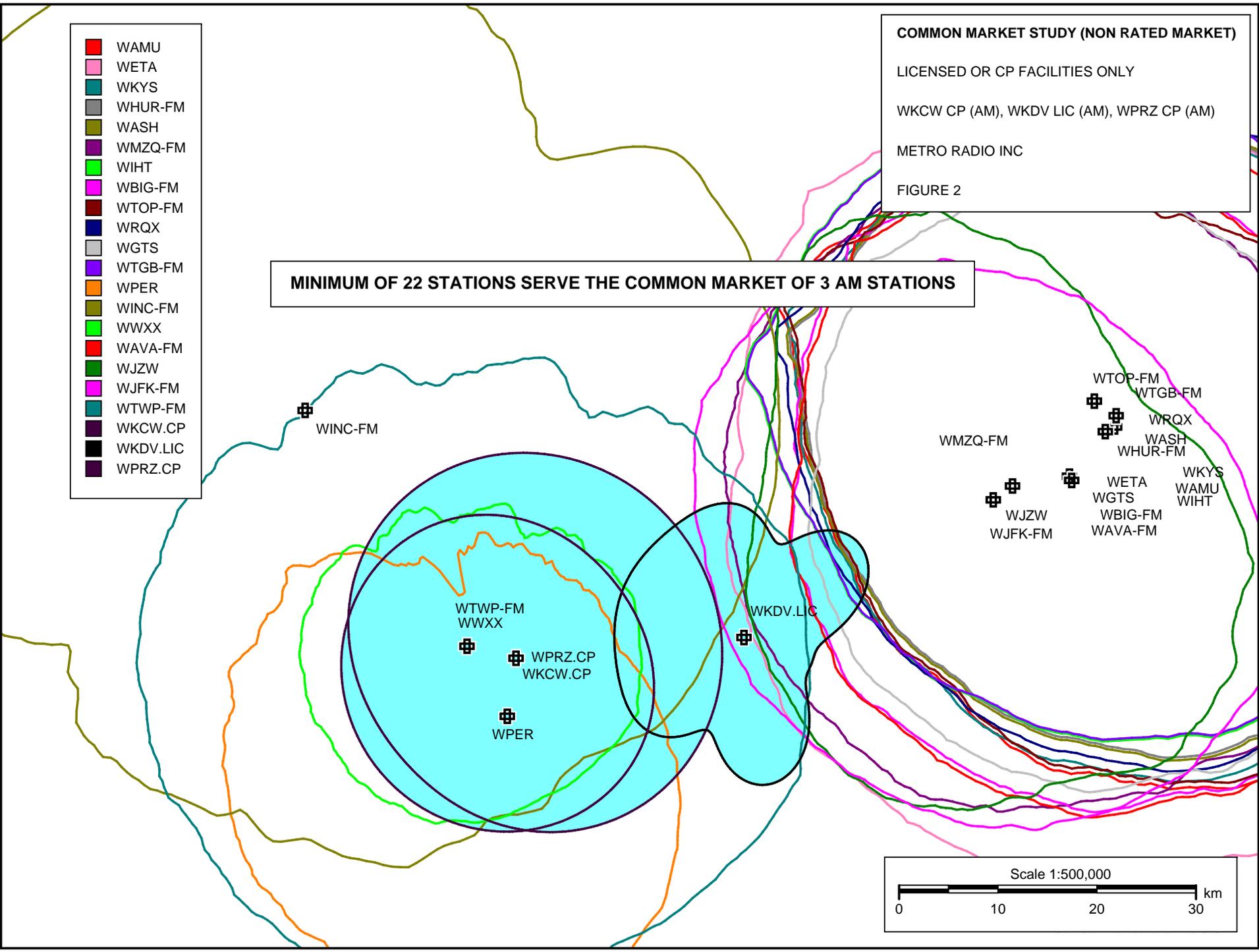


TABLE 1 METRO MEDIA, INC

A MINIMUM OF 22 STATIONS SERVE THE COMMON NON-RATED MARKET OF 3 AM STATIONS

Call Sign	Lic	Chan.	Svc	Cls	City	ST	
WAMU	LIC	203	FM	B	Washington	DC	
WETA	LIC	215	FM	B	Washington	DC	
WKYS	LIC	230	FM	B	Washington	DC	
WHUR-FM	LIC	242	FM	B	Washington	DC	
WASH	LIC	246	FM	B	Washington	DC	
WMZQ-FM	LIC	254	FM	B	Washington	DC	
WIHT	LIC	258	FM	B	Washington	DC	
WBIG-FM	LIC	262	FM	B	Washington	DC	
WTOP-FM	LIC	278	FM	B	Washington	DC	
WRQX	LIC	297	FM	B	Washington	DC	
WGTS	LIC	220	FM	B	Takoma Park	MD	
WTGB-FM	LIC	234	FM	B	Bethesda	MD	
WPER	LIC	210	FM	B	Culpeper	VA	
WINC-FM	LIC	223	FM	B	Winchester	VA	
WWXX	LIC	232	FM	A	Warrenton	VA	
WAVA-FM	LIC	286	FM	B	Arlington	VA	
WJZW	LIC	290	FM	B	Woodbridge	VA	
WJFK-FM	LIC	294	FM	B	Manassas	VA	
WTWP-FM	LIC	299	FM	B	Warrenton	VA	
WKCW.CP	CP	1420	AM		Warrenton	VA	ALREADY COMMONLY OWNED
WKDV.LIC	LIC	1460	AM		Manassas	VA	ALREADY COMMONLY OWNED
WPRZ.CP	CP	125	AM		Warrenton	VA	STATION TO BE ACQUIRED

**COMBINED MARKET AREAS (NON-RATED MARKETS)  
COMPUTED USING LICENSED PERMITS WPRZ / WKCW / WKDV**

**MAXIMUM OVERLAP SIGNALS 2 IN 2 MARKETS  
5 MV/M GW DAYTIME CONTOURS**

**FIGURE 3**

**OVERLAP SERVICES**  
2 COMMONLY OWNED AM STATIONS  
2 MARKETS

NUMBER IN BOXES ARE SERVICE OVERLAPS

078-00-820

39-00-00 N

**WKCW.LIC**

Freq: 1420 kHz  
Class: D  
Latitude: 38-45-05 N  
Longitude: 077-44-38 W  
Power: 10 kW  
RMS: 315.43 mV/m @1km

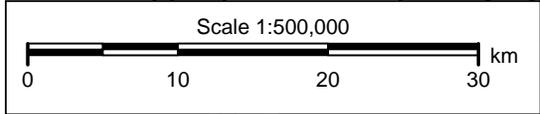
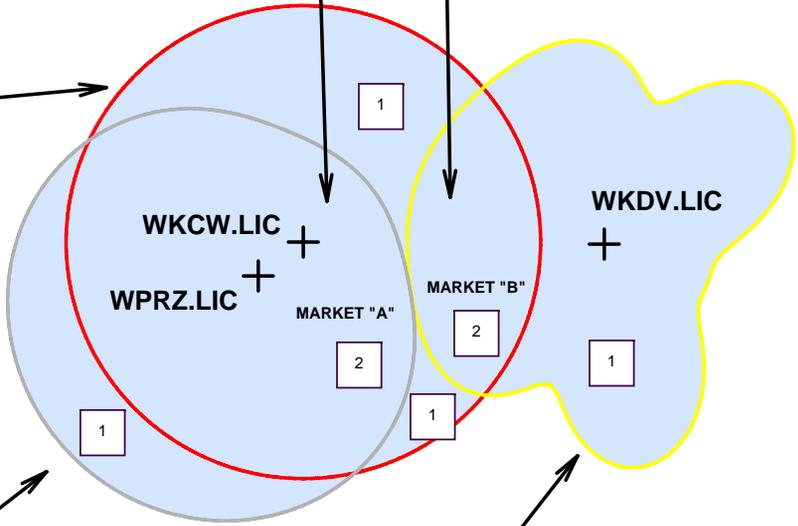
**WPRZ.LIC**

Freq: 1250 kHz  
Class: D  
Latitude: 38-43-52 N  
Longitude: 077-46-42 W  
Power: 5 kW  
RMS: 670 mV/m @1km

**WKDV.LIC**

Freq: 1460 kHz  
Class: B  
Latitude: 38-45-00 N  
Longitude: 077-30-49 W  
Power: 5 kW  
RMS: 683.97 mV/m @1km

38-30-00 N



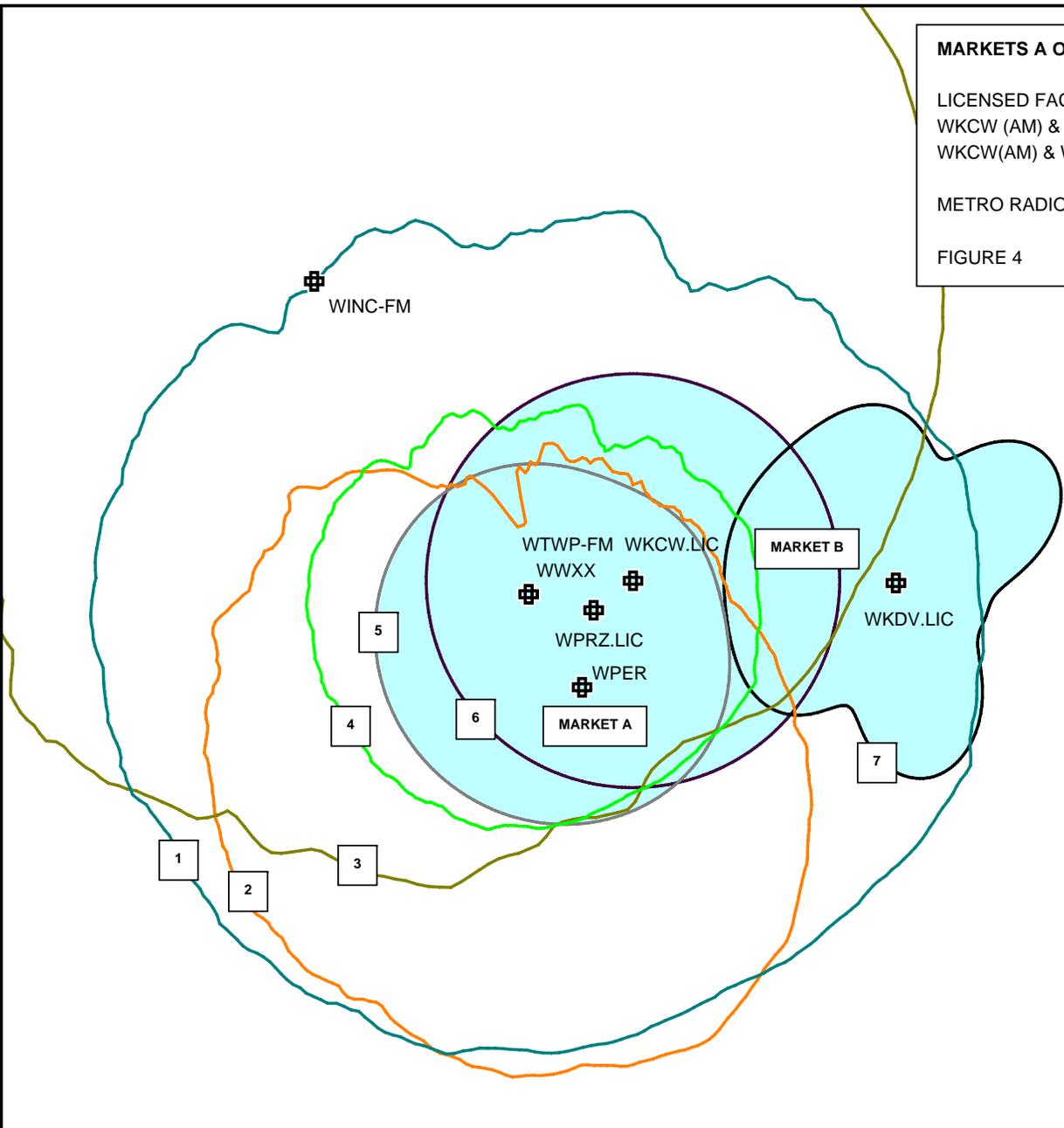
**AM CONTOURS COMPUTED USING STANDARD M3 SOIL CONDUCTIVITIES**

**MARKETS A OR B COMMON MARKET STUDY (NON RATED MARKET)**

LICENSED FACILITIES ONLY  
 WKCW (AM) & WPRZ (AM) - MARKET A  
 WKCW(AM) & WKDV(AM) - MARKET B

METRO RADIO INC

FIGURE 4



- WPER
- WINC-FM
- WWXX
- WTWP-FM
- WKCW.LIC
- WKDV.LIC
- WPRZ.LIC

**AT LEAST 7 STATIONS SERVE THE NON-RATED MARKETS**

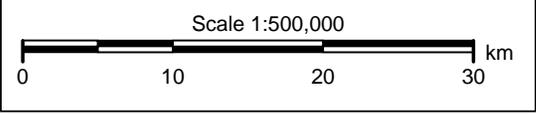


TABLE 2 METRO MEDIA, INC

STATIONS SERVING MARKETS A OR B

MARKET A COMBINED COMMON SERVICE AREA OF WKCW AND WPRZ (2 - AM STATIONS)

MARKET B COMBINED COMMON SERVICE AREA OF WKCW AND WKDV (2 - AM STATIONS) \*

Call Sign	Lic	Chan.	Svc	Cls	City	ST
WPER	LIC	210	FM	B	Culpeper	VA
WINC-FM	LIC	223	FM	B	Winchester	VA
WWXX	LIC	232	FM	A	Warrenton	VA
WTWP-FM	LIC	299	FM	B	Warrenton	VA
WKCW.LIC	LIC	1420	AM		Warrenton	VA ALREADY COMMONLY OWNED
WKDV.LIC	LIC	1460	AM		Manassas	VA ALREADY COMMONLY OWNED
WPRZ.LIC	LIC	1250	AM		Warrenton	VA STATION TO BE ACQUIRED

\*MARKET B COMBINATION OF WKCW AND WKDV ARE ALREADY COMMONLY OWNED.