

**RADIO MARKET ANALYSIS**  
**WAZZ LICENSE LIMITED PARTNERSHIP**  
**WAZZ RADIO STATION**  
**FAYETTEVILLE, NORTH CAROLINA**  
**March 2009**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf WAZZ License Limited Partnership ("WLLP"), licensee of radio station WAZZ, 1490 kHz, Fayetteville, North Carolina. WLLP is submitting an application to correct the coordinates of WAZZ. As such, a Radio Market Analysis is necessary. Principals of WLLP also have an attributable interest in WKML, Channel 239C0, Lumberton, North Carolina; WZFX, Channel 256C1, Whiteville, North Carolina; WFLB, Channel 243C, Laurinburg, North Carolina; WUKS, Channel 299C3, St. Pauls, North Carolina; and WTEL, 1160 kHz, Red Springs, North Carolina. WAZZ, WKML, WTEL, and WUKS are licensed to communities in a metro county in the Fayetteville, North Carolina Arbitron Market. WZFX and WFLB are not licensed to a metro county but are considered "home" to the Fayetteville Arbitron Market. As a result, a hybrid ownership analysis is necessary to demonstrate compliance in both a rated and non-rated market.<sup>1</sup>

**FAYETTEVILLE, NORTH CAROLINA ARBITRON/BIA MARKET REVIEW**

2. As shown on Exhibit #1, there are twenty-four AM and FM (commercial and non-commercial) stations listed in the Fayetteville, North Carolina Arbitron Market (Market #128). WLLP would be in control of four FM stations and two AM stations in the market. The number of stations indicated falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the

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1) The proposed WAZZ city grade contour does not overlap with the WTEL contour. As such, WTEL is not considered further in this study.

Commission's rules. At this level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. Therefore, WLLP is in compliance in the Fayetteville, North Carolina Arbitron Market.

### **REVISED CONTOUR OVERLAP ANALYSIS**

3. A study has been conducted to verify that ownership of the subject stations are also in compliance with the Commission's revised contour overlap rules. The city grade contours of the subject stations are shown on Exhibit #2. The city grade contour of WFLB will be used to define the market boundary, hereinafter referred to as the "Radio Market". This boundary will be used to determine the number of other commercial and non-commercial AM and FM stations that either have transmitter sites within or provide coverage to the radio market. These stations will then be added to the relevant subject stations in the Radio Market. Only those stations with transmitter sites within 92.0 kilometers will be considered as contributors to the market. No other station in which WLLP has interests will be considered, unless it is a subject station in the market under review.

4. Exhibit #3 is a depiction of the stations within, or providing service, to the WFLB / Radio Market boundary. Exhibit #4 is a tabulation of the stations in the Radio Market, which totals fifteen when the five subject stations are included. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.<sup>2</sup> At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no

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2) There are additional stations; however, they were not considered as there were sufficient stations, based on the number of facilities in to be commonly held.

more four in the same service, is permissible. As such, the contour overlap market is in compliance with the rules.

5. Based on the compliance shown in the rated and non-rated markets, it is demonstrated herein that the minor change application to correct the coordinates for WAZZ is in compliance with §73.3555 of the Commission's multiple ownership rules.

6. The foregoing technical statement was prepared on behalf of WAZZ License Limited Partnership 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 in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.3. BIA database. All other data was extracted from the CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.



## FCC Geographic Market Definition for Fayetteville, NC

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market		Owner	City & State of License	County of License
						Designn Date	Home Mkt Rank			
WAGR	AM	1340	C	BkGsp/Talk	Fayetteville, NC	07/02/2003	130	WAGR Broadcasting Incorporated	Lumberton, NC	Robeson
WAZZ	AM	1490	C	Adlt Strndr	Fayetteville, NC	07/02/2003	130	Beasley Broadcast Group	Fayetteville, NC	Cumberland
WCCG	FM	104.5	C	HpHop/Rhy	Fayetteville, NC	07/02/2003	130	Carson, James E.	Hope Mills, NC	Cumberland
WCLN	FM	107.3	C	ChrsContem	Fayetteville, NC	07/02/2003	130	Christian Listening Network Inc	Clinton, NC	Sampson
WFAY	AM	1230	C	Sports	Fayetteville, NC	07/02/2003	130	CRS Radio Holdings Inc	Fayetteville, NC	Cumberland
WFBX	AM	1450	C	Sports	Fayetteville, NC	07/02/2003	130	CRS Radio Holdings Inc	Spring Lake, NC	Cumberland
WFLB	FM	96.5	C	Adult Hits	Fayetteville, NC	07/02/2003	130	Beasley Broadcast Group	Laurinburg, NC	Scotland
WFMO	AM	860	C	Mexican	Myrtle Beach, SC	01/06/2009	158	Davidson Media Group LLC	Fairmont, NC	Robeson
WFNC	AM	640	C	News/Talk	Fayetteville, NC	07/02/2003	130	Cumulus Media Holdings Inc	Fayetteville, NC	Cumberland
WFSS	FM	91.9	NC	Jazz/News	Fayetteville, NC	07/02/2003	130	Fayetteville State University	Fayetteville, NC	Cumberland
WFVL	FM	102.3	NC	ChrsContem	Fayetteville, NC	07/02/2003	130	Educational Media Foundation	Lumberton, NC	Robeson
WGQR	FM	105.7	C	Sothn Gspel	Fayetteville, NC	02/15/2011	130	Christian Listening Network Inc	Rennert, NC	Robeson
WIDU	AM	1600	C	BkGsp/Talk	Fayetteville, NC	07/02/2003	130	WIDU Inc	Fayetteville, NC	Cumberland
WKML	FM	95.7	C	Country	Fayetteville, NC	07/02/2003	130	Beasley Broadcast Group	Lumberton, NC	Robeson
WLPS	FM	89.5	NC	Sothn Gspel	Fayetteville, NC	03/08/2006	130	Billy Ray Locklear Evangelistic Association	Lumberton, NC	Robeson
WMGU	FM	106.9	C	Urban AC	Fayetteville, NC	07/02/2003	130	Cumulus Media Holdings Inc	Southern Pines, NC	Moore
WQSM	FM	98.1	C	Variety	Fayetteville, NC	07/02/2003	130	Cumulus Media Holdings Inc	Fayetteville, NC	Cumberland
WRCC	FM	103.5	C	Rock	Fayetteville, NC	07/02/2003	130	Cumulus Media Holdings Inc	Dunn, NC	Harnett
WSTS	FM	100.9	C	Sothn Gspel	Fayetteville, NC	07/02/2003	130	Davidson Media Group LLC	Fairmont, NC	Robeson
WTEL	AM	1160	C	Gospel	Fayetteville, NC	07/02/2003	130	Beasley Broadcast Group	Red Springs, NC	Robeson
WUKS	FM	107.7	C	Urban AC	Fayetteville, NC	07/02/2003	130	Beasley Broadcast Group	St. Pauls, NC	Robeson
WWFJ	FM	88.1	NC	Sothn Gspel	Fayetteville, NC	12/17/2010	130	Church Planters of America	East Fayetteville, NC	Cumberland
WYBH	FM	91.1	NC	Chrst/Talk	Fayetteville, NC	11/14/2008	130	Bible Broadcasting Network Inc	Fayetteville, NC	Cumberland
WZFX	FM	99.1	C	Hip Hop	Fayetteville, NC	07/02/2003	130	Beasley Broadcast Group	Whiteville, NC	Columbus
WZRI	FM	89.3	NC	ChrsContem	Fayetteville, NC	07/02/2003	130	Educational Media Foundation	Spring Lake, NC	Cumberland

Number of Stations in Geographic Market

25

Previous Stations in Geographic Market	
WQTM	AM 1480 C DARK
WYBJ	FM 90.7 NC Gospel

01/01/2009

0

WQTM Inc

Fair Bluff, NC

Columbus

08/07/2007

0

Grace Christian School

Newton Grove, NC

Sampson

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

# Graham Brock, Inc. - Broadcast Technical Consultants

**WAZZ**  
BLH-19980909KB  
Latitude: 34-44-05 N  
Longitude: 078-47-25 W  
ERP: 100.00 kW  
Channel: 256C1  
AMSL Height: 333.0 m

**WTEL**  
BLH-19981020KB  
Latitude: 34-52-17 N  
Longitude: 079-08-49 W  
ERP: 5.20 kW  
Channel: 299C3  
AMSL Height: 261.0 m

**WKML**  
BLH-19971024KA  
Latitude: 34-46-50 N  
Longitude: 079-02-45 W  
ERP: 100.00 kW  
Channel: 239C0  
AMSL Height: 368.0 m

**WAZZ 5.0 mV/m**

**WTEL 5.0 mV/m**

**WAZZ 3.16 mV/m**

**WTEL 3.16 mV/m**

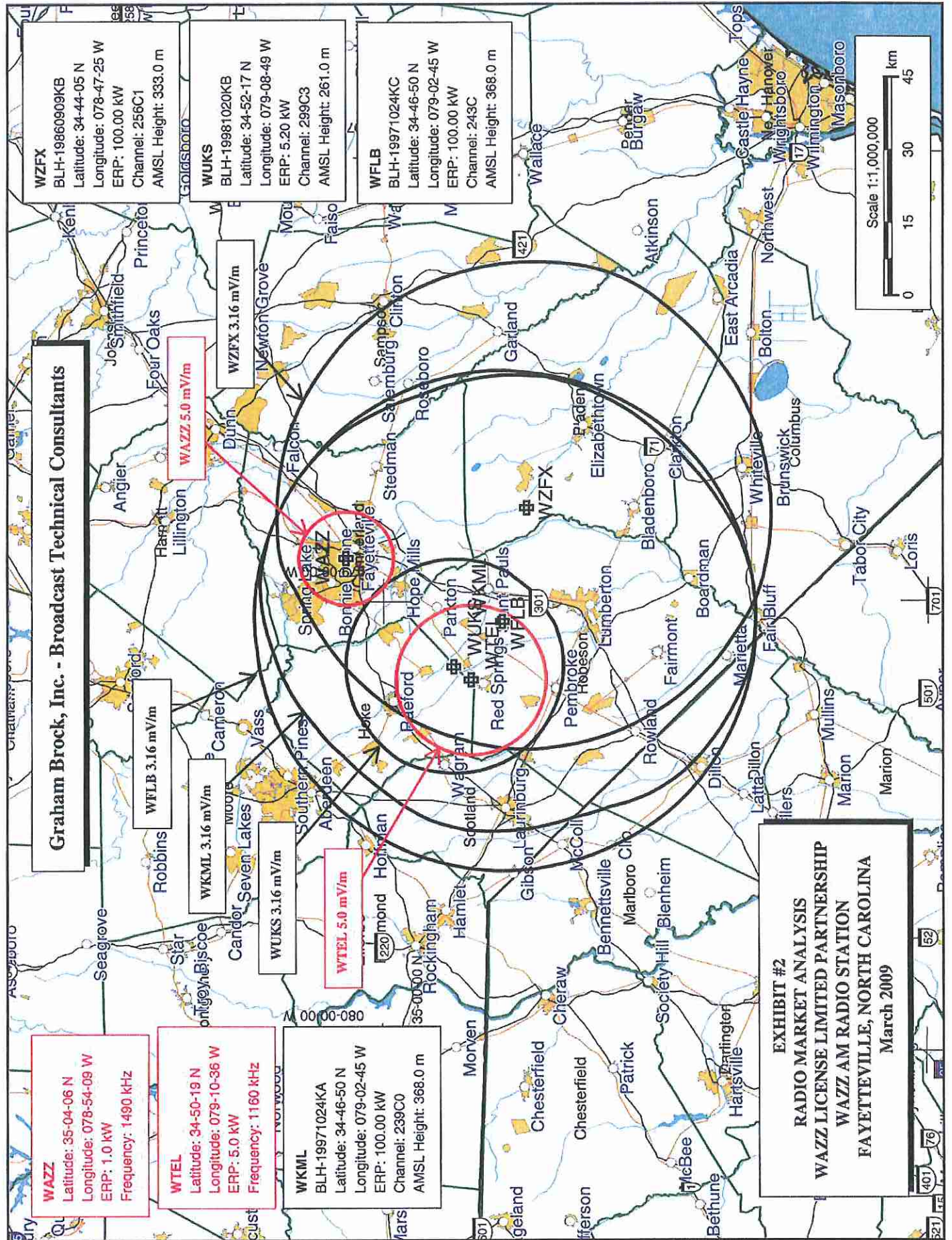
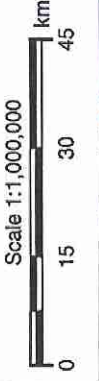
**WKML 3.16 mV/m**

**WAZZ 5.0 mV/m**

**WTEL 5.0 mV/m**

**WKML 5.0 mV/m**

**EXHIBIT #2**  
**RADIO MARKET ANALYSIS**  
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**WAZZ AM RADIO STATION**  
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**EXHIBIT #4**

**Tabulation of Stations in Radio Market**

**AM Stations**

WFAY	1230 kHz	Fayetteville, North Carolina
WLNC	1300 kHz	Laurinburg, North Carolina
WAGR	1340 kHz	Lumberton, North Carolina
WMFA	1400 kHz	Raeford, North Carolina
* WAZZ	1490 kHz	Fayetteville, North Carolina

Total AM Stations - 5

**FM Stations**

WRAE	Ch 204A	Raeford, North Carolina
WLPS-FM	Ch 208A	Lumberton, North Carolina
WYBH	Ch 216A	Fayetteville, North Carolina
* WKML	Ch 239C0	Lumberton, North Carolina
* WFLB	Ch 243C	Laurinburg, North Carolina
* WZFX	Ch 256C1	Whiteville, North Carolina
WFNC-FM	Ch 272A	Lumberton, North Carolina
WCCG	Ch 283A	Hope Mills, North Carolina
WGQR	Ch 289C3	Elizabethtown, North Carolina
* WUKS	Ch 299C3	St. Pauls, North Carolina

Total FM Stations - 10

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 15**

\* Subject station.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

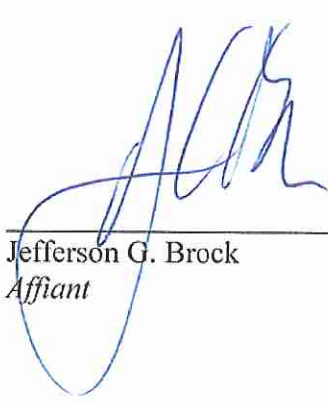
*State of Georgia )*  
*St. Simons Island ) ss:*  
*County of Glynn )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by WAZZ License Limited Partnership to prepare the attached Technical Exhibit.

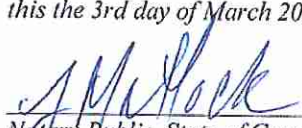
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 3rd day of March 2009.*

  
\_\_\_\_\_  
Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me  
this the 3rd day of March 2009*

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: June 16, 2012