

**COMPLIANCE WITH 47 C.F.R. § 73.3555(c): THE RADIO-TELEVISION  
CROSS OWNERSHIP RULE**

Millennium Shore License Holdco, LLC (“Millennium Shore”), which is indirectly wholly-owned and controlled by Millennium Radio Group, LLC (“Millennium Radio”), seeks prior FCC consent to acquire broadcast station WCHR-FM, Manahawkin, New Jersey from Nassau Broadcasting II, L.L.C. Alta/Millennium Corp., a member of Millennium Radio, has an attributable interest in WWSI(TV), Atlantic City, New Jersey.

The attached map prepared by Dataworld shows the Grade A contour of WWSI(TV) and the 1 mV/m contour of WCHR-FM as well as the 1 mV/m contours and the 2 mV/m contours of each of the FM and AM stations, respectively, in which Millennium Radio has an attributable interest. As can be seen from the map, WWSI(TV)’s Grade A contour completely encompasses the community of license of WCHR-FM, but the 1 mV/m contour of WCHR-FM does not encompass WWSI(TV)’s community of license. WWSI(TV) is located in the Philadelphia, Pennsylvania DMA and the Atlantic City – Cape May, New Jersey radio metro market, while WCHR-FM is located in the New York, New York DMA and the Monmouth – Ocean, New Jersey radio metro market. Therefore, because WCHR-FM and WWSI(TV) are located in separate markets, the contour encompassment of Manahawkin by WWSI(TV)’s Grade A contour does not trigger the radio-television cross-ownership rule, and WCHR-FM does not count toward Millennium Radio’s radio/television ownership limits in WWSI(TV)’s market. *See Review of the Commission’s Regulations Governing Television Broadcasting*, Memorandum Opinion and Second Order on Reconsideration, 16 FCC Rcd 1067, ¶ 41 (2001) (“[F]or purposes of the radio/TV cross-ownership rule, we generally do not count radio stations located in one Arbitron radio market toward the limits on the number of radio stations a party may own in another Arbitron radio market, even when the radio stations in the different markets fall within the Grade A contour of a commonly owned TV station.”).