

RADIO MARKET ANALYSIS
TELESOUTH COMMUNICATIONS, INC.
WKBB (FM) RADIO STATION
WEST POINT, MISSISSIPPI
June 2009

TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of TeleSouth Communications, Inc. ("TCI"), licensee of station WKBB, Channel 265C3, West Point, Mississippi. TCI is submitting a minor change application for WKBB. The proposed change requests an upgrade to Channel 265C2 and a change in community of license to Mantee, Mississippi. Therefore, a Radio Market Analysis is needed. TCI is also the licensee of WROB (AM), 1450 kHz, West Point, Mississippi and is an applicant for a New FM station at Vardaman, Mississippi ("Vardaman"), BNPH-20070427AAU.¹ None of these facilities is located in a metro county in any Arbitron rated market.² The city grade contour of the proposed WKBB overlaps with the proposed Vardaman facility, and the licensed WROB facility. As such, a revised contour overlap study is needed. Attached as Exhibit #1 is a map depicting the city grade contours of the subject stations.

2. Based on the overlap of contours, two markets are created. Radio Market #1 contains WKBB and the Vardaman proposal. Radio Market #2 consists of WKBB and WROB. A study

-
- 1) TCI is also the licensee of WTMN, Channel 288A, Water Valley; WQLJ, Channel 229C2, Oxford; WFMM, Channel 247A, Sumrall; WXRZ, Channel 232C3, Corinth; WRQO, Channel 271C2, Monticello; WDXO, Channel 225A, Hazlehurst; WTCD, Channel 245C2, Indianola; WYMX, Channel 256C0, Greenwood; WKCU, 1350 kHz, Corinth; WKXG, 1540 kHz, Greenwood and WOEG, 1220 kHz, Hazlehurst, Mississippi. In addition, TCI is the corporate parent of the licensee of WFMN, Channel 247C3, Flora, Mississippi. TCI also has an outstanding permit for WBZL, Greenwood, Mississippi (and an application seeking to relocate and upgrade to Channel 277C3). None of these stations or the application have contour overlap with the proposed WKBB, West Point, Mississippi. Therefore, they are not considered in this study.
- 2) Based on the change of community of license, WKBB will no longer be considered a Metro station in the Columbus, Starkville, West Point, Mississippi market.

has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. The study will determine the number of other commercial AM and FM stations that either have transmitter sites within, or provide coverage to, each subject radio market. Since the contour of WKBB is a subject station in both markets, it will be used to determine the number of other non-attributable stations, which will then be added to the subject stations in the respective market. Only those stations with transmitter sites within 92.0 kilometers will be considered as contributors to the market. No other station in which TCI has interests will be considered, unless it is a subject station in the market under review.

3. Exhibit #2 is a depiction of the other commercial and non-commercial stations within, or providing service to, the WKBB/Radio Market boundary. A total of five other stations are depicted on the map. Exhibit #3 is a tabulation of the stations in Radio Market #1, a total of seven stations when the two subject stations are added.³ The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. 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 the number of stations to be commonly held does not exceed 50% of the stations in the market. Therefore, TCI's ownership in Radio Market #1 is in compliance with the ownership rules.

3) There are additional stations in the market; however, they were not considered as a sufficient number of stations was depicted, based on the number of facilities to be commonly held.

4. Exhibit #4 is a tabulation of the stations in Radio Market #2, a total seven stations when the two subject stations are added.⁴ The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. 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 the number of stations to be commonly held does not exceed 50% of the stations in the market. Therefore, TCI's ownership in Radio Market #2 is in compliance with the ownership rules.

5. The foregoing demonstrates that, upon the grant of the instant allocation, TCI will have interests in one FM and one AM station (WKBB and WROB) in one market and two FM stations (WKBB and Vardaman) in a second market. Both markets have at least seven radio stations. Accordingly, grant of the application is fully consistent with §73.3555 of the Commission's multiple ownership rules.

6. Currently, WKBB is considered a metro station in the Columbus/Starkville/West Point, Mississippi Arbitron market. Under the instant proposal, its status would likely change to a "home" to the market station. Assuming that WKBB will remain part of the Columbus/Starkville/West Point, Mississippi Arbitron market, following implementation of the change of community of license to Mantee, Mississippi, an analysis for a rated market was also undertaken. Attached as Exhibit #5 is a printout of the stations in the rated Columbus/Starkville/West Point, Mississippi Arbitron market. As shown on Exhibit #5, there are nineteen AM and FM

4) There are additional stations in the market; however, they were not considered as a sufficient number of stations was depicted, based on the number of facilities to be commonly held.

(commercial and non-commercial) stations listed in the Columbus/ Starkville/West Point, Mississippi Arbitron market (Market #274). TCI would remain in control of one FM station and one AM station 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 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, TCI is in compliance with rules for control of stations in the rated Columbus/Starkville/West Point, Mississippi Arbitron market.

7. The foregoing technical statement was prepared on behalf of TeleSouth Communications, Inc., 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. 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. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

Graham Brock, Inc. - Broadcast Technical Consultants

WKBB Proposed

Latitude: 33-40-43 N
Longitude: 088-48-18 W
ERP: 47.00 kW
Channel: 265C2
Frequency: 100.9 MHz
AMSL Height: 230.0 m
Horiz. Pattern: Directional
Prop Model : FCC

Vardaman, MS

BNPH-20070427AAU
Latitude: 33-46-37 N
Longitude: 089-15-23 W
ERP: 6.00 kW
Channel: 258A
Frequency: 99.5 MHz
AMSL Height: 205.7 m
Horiz. Pattern: Omni
Prop Model : FCC

WROB

Latitude: 33-36-30 N
Longitude: 088-39-15 W
ERP: 1.00 kW
Frequency: 1450.0 KHz
Prop Model : FCC/M3

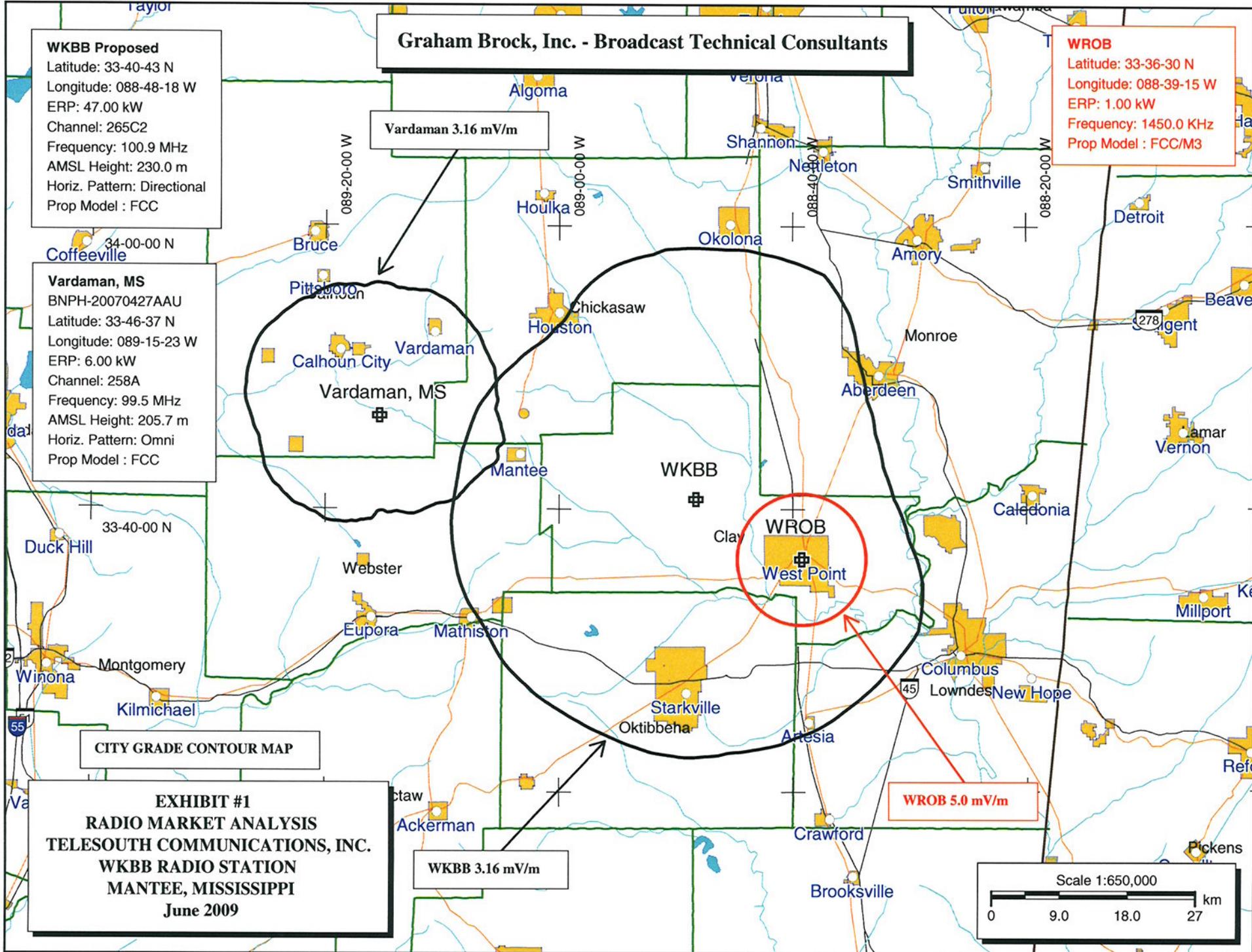
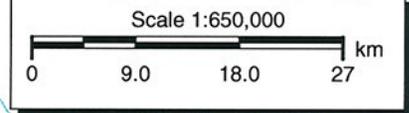
Vardaman 3.16 mV/m

WROB 5.0 mV/m

WKBB 3.16 mV/m

CITY GRADE CONTOUR MAP

EXHIBIT #1
RADIO MARKET ANALYSIS
TELESOUTH COMMUNICATIONS, INC.
WKBB RADIO STATION
MANTEE, MISSISSIPPI
June 2009

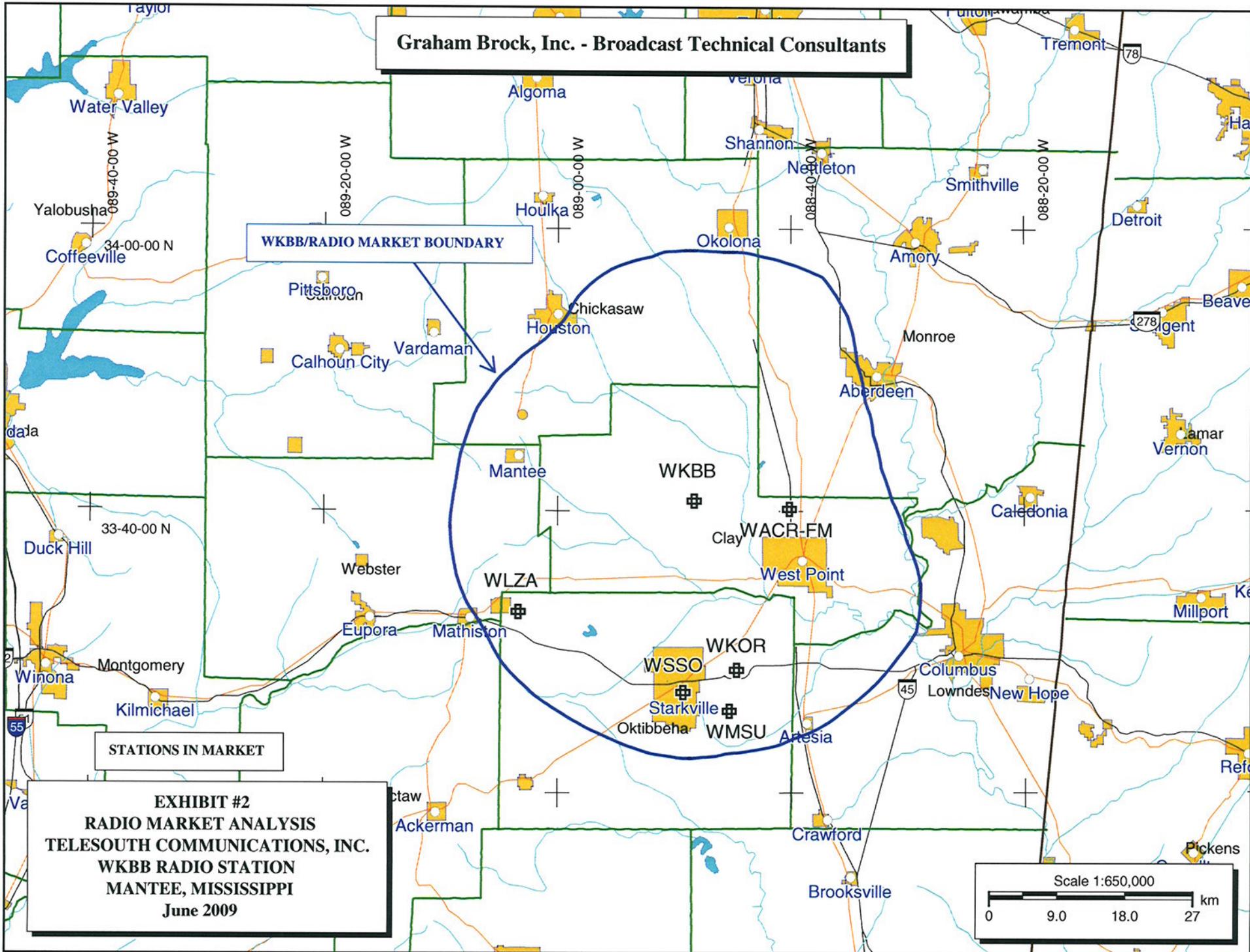
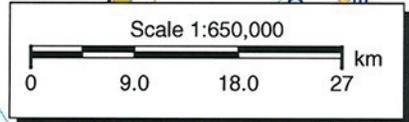


Graham Brock, Inc. - Broadcast Technical Consultants

WKBB/RADIO MARKET BOUNDARY

STATIONS IN MARKET

**EXHIBIT #2
RADIO MARKET ANALYSIS
TELESOUTH COMMUNICATIONS, INC.
WKBB RADIO STATION
MANTEE, MISSISSIPPI
June 2009**



RADIO MARKET ANALYSIS
TELESOUTH COMMUNICATIONS, INC.
WKBB (FM) RADIO STATION
WEST POINT, MISSISSIPPI
June 2009

EXHIBIT #3

Tabulation of Stations in Radio Market #1

AM Stations

| | | |
|------|----------|-------------------------|
| WKOR | 980 kHz | Starkville, Mississippi |
| WSSO | 1230 kHz | Starkville, Mississippi |

Total AM Stations - 2

FM Stations

| | | |
|----------|----------|---------------------------|
| WMSU | Ch 221A | Starkville, Mississippi |
| WLZA | Ch 241C2 | Eupora, Mississippi |
| * New FM | Ch 258A | Vardaman, Mississippi |
| * WKBB | Ch 265C2 | Mantee, Mississippi |
| WACR-FM | Ch 287C2 | Columbus AFB, Mississippi |

Total FM Stations - 5

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 7

* Subject station.

RADIO MARKET ANALYSIS
TELESOUTH COMMUNICATIONS, INC.
WKBB (FM) RADIO STATION
WEST POINT, MISSISSIPPI
June 2009

EXHIBIT #4

Tabulation of Stations in Radio Market #2

AM Stations

| | | |
|--------|----------|-------------------------|
| WKOR | 980 kHz | Starkville, Mississippi |
| WSSO | 1230 kHz | Starkville, Mississippi |
| * WROB | 1450 kHz | West Point, Mississippi |

Total AM Stations - 3

FM Stations

| | | |
|---------|----------|---------------------------|
| WMSU | Ch 221A | Starkville, Mississippi |
| WLZA | Ch 241C2 | Eupora, Mississippi |
| * WKBB | Ch 265C2 | Mantee, Mississippi |
| WACR-FM | Ch 287C2 | Columbus AFB, Mississippi |

Total FM Stations - 4

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 7

* Subject station.



FCC Geographic Market Definition for Columbus-Starkville-West

| Call Letters | AM/FM | Freq | Type Station | Format | Home Market | Market Designtn Date | Home Mkt Rank | Owner | City & State of License | County of License |
|--------------|-------|-------|--------------|-------------|------------------------------------|----------------------|---------------|--|-------------------------|-------------------|
| WTWG | AM | 1050 | C | Talk/BkGsp | Columbus-Starkville-West Point, MS | 07/02/2003 | 274 | T & W Communications Corporation | Columbus, MS | Lowndes |
| WACR | FM | 105.3 | C | Urban AC | Columbus-Starkville-West Point, MS | 04/24/2006 | 274 | URBan Radio Broadcasting LLC | Columbus Afb, MS | Lowndes |
| WNMQ | FM | 103.1 | C | Hot AC | Columbus-Starkville-West Point, MS | 07/02/2003 | 274 | Cumulus Broadcasting Inc | Columbus, MS | Lowndes |
| WKBB | FM | 100.9 | C | Talk | Columbus-Starkville-West Point, MS | 07/02/2003 | 274 | TeleSouth Communications Inc | West Point, MS | Clay |
| WKOR | AM | 980 | C | Sports | Columbus-Starkville-West Point, MS | 07/02/2003 | 274 | Cumulus Broadcasting Inc | Starkville, MS | Oktibbeha |
| WMSU | FM | 92.1 | C | HpHop/Urba | Columbus-Starkville-West Point, MS | 07/02/2003 | 274 | URBan Radio Broadcasting LLC | Starkville, MS | Oktibbeha |
| WJWF | AM | 1400 | C | Sports | Columbus-Starkville-West Point, MS | 07/02/2003 | 274 | Cumulus Broadcasting Inc | Columbus, MS | Lowndes |
| WROB | AM | 1450 | C | Oldies | Columbus-Starkville-West Point, MS | 07/02/2003 | 274 | TeleSouth Communications Inc | West Point, MS | Clay |
| WMXU | FM | 106.1 | C | Urban | Columbus-Starkville-West Point, MS | 07/02/2003 | 274 | Cumulus Broadcasting Inc | Starkville, MS | Oktibbeha |
| WSSO | AM | 1230 | C | Sports | Columbus-Starkville-West Point, MS | 07/02/2003 | 274 | Cumulus Broadcasting Inc | Starkville, MS | Oktibbeha |
| WSMS | FM | 99.9 | C | Rock | Columbus-Starkville-West Point, MS | 08/05/2005 | 274 | Cumulus Broadcasting Inc | Artesia, MS | Lowndes |
| WKOR | FM | 94.9 | C | Country | Columbus-Starkville-West Point, MS | 07/02/2003 | 274 | Cumulus Broadcasting Inc | Columbus, MS | Lowndes |
| WAJV | FM | 98.9 | C | Urban/Gospl | Columbus-Starkville-West Point, MS | 07/02/2003 | 274 | URBan Radio Broadcasting LLC | Brooksville, MS | Noxubee |
| WMAB | FM | 89.9 | NC | NPR/News | Columbus-Starkville-West Point, MS | 07/02/2003 | 274 | Mississippi Authority for Educational Television | Mississippi State, MS | Oktibbeha |
| WMSV | FM | 91.1 | NC | AAA | Columbus-Starkville-West Point, MS | 07/02/2003 | 274 | Mississippi State University | Starkville, MS | Oktibbeha |
| WQJB | FM | 104.5 | C | ChrsContem | Columbus-Starkville-West Point, MS | 07/02/2003 | 274 | Flinn Broadcasting Corporation | State College, MS | Oktibbeha |
| WJZB | FM | 88.7 | NC | Religion | Columbus-Starkville-West Point, MS | 08/15/2005 | 274 | American Family Association Incorporated | Starkville, MS | Oktibbeha |
| WCOS | FM | 90.5 | NC | Christian | Columbus-Starkville-West Point, MS | 09/12/2006 | 274 | American Family Association Incorporated | Columbus, MS | Lowndes |
| WMUW | FM | 88.5 | NC | Variety | Columbus-Starkville-West Point, MS | 02/20/2008 | 274 | Mississippi University For Women | Columbus, MS | Lowndes |

Number of Stations in Geographic Market 19

Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed



AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

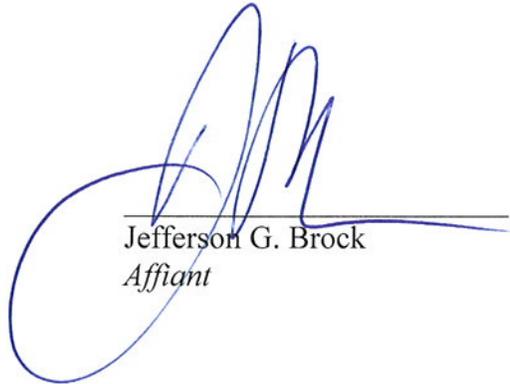
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Telesouth Communications, Inc., 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.

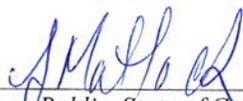
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 9th day of June 2009.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 9th day of June 2009*



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