

**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.<sup>1</sup> None of these facilities is located in a metro county in any Arbitron rated market.<sup>2</sup> 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.<sup>3</sup> 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.<sup>4</sup> 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

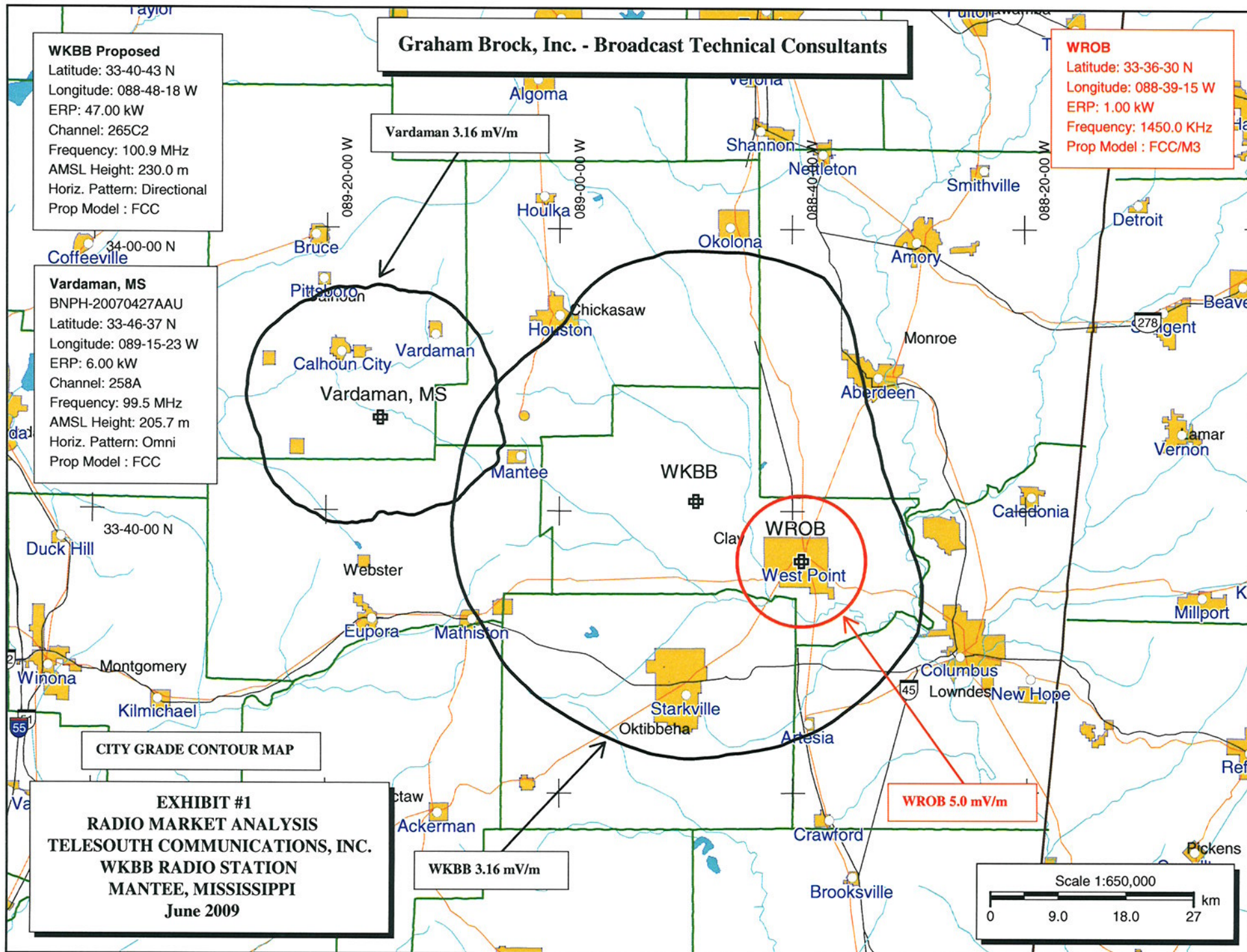
---

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.

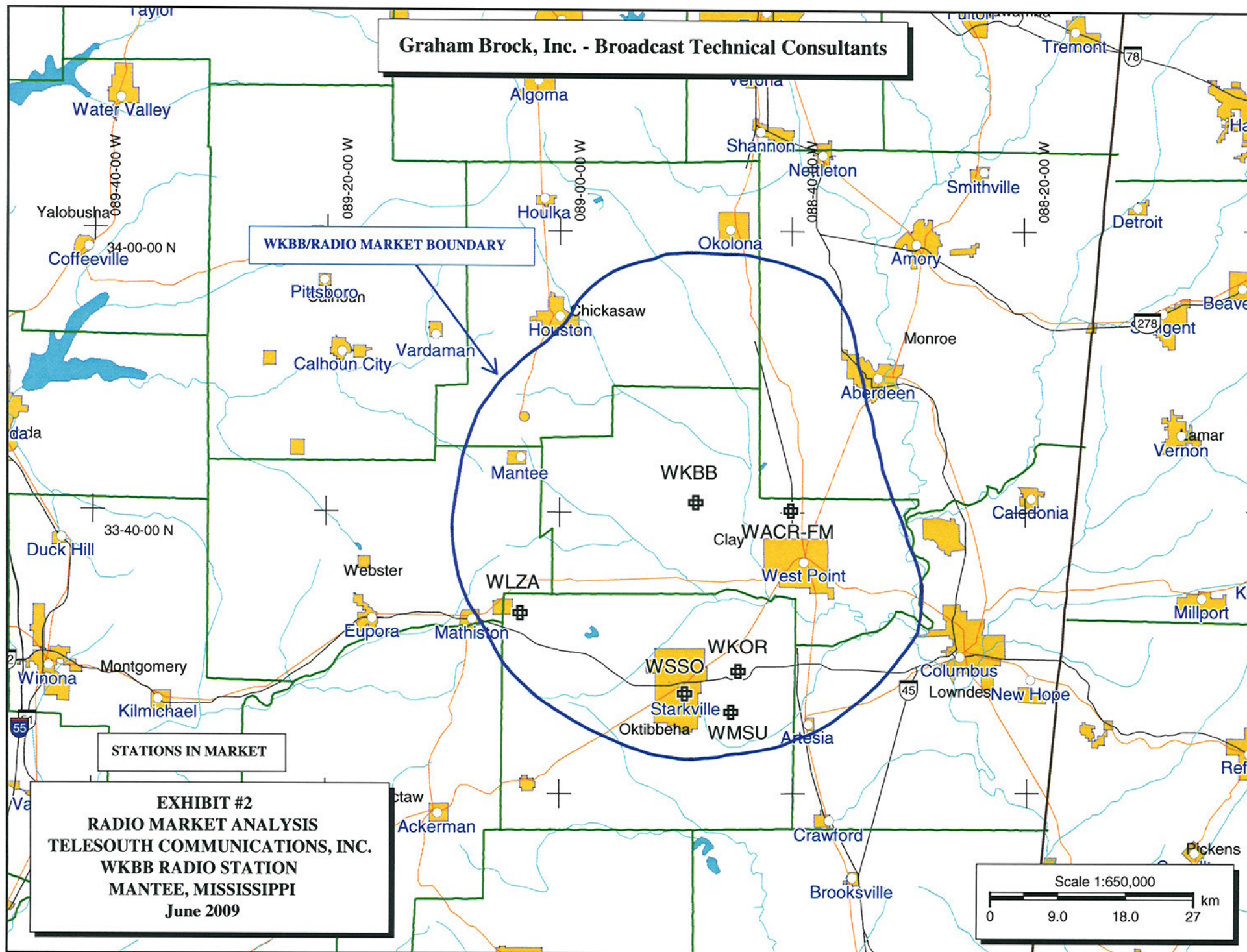


(commercial and non-commercial) stations listed in the Columbus/ Starkville/West Point, Mississippi Arbitron market (Market #274). TCI would remain in control of one FM station and one AM station in the market. The number of stations indicated falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) 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.







**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**

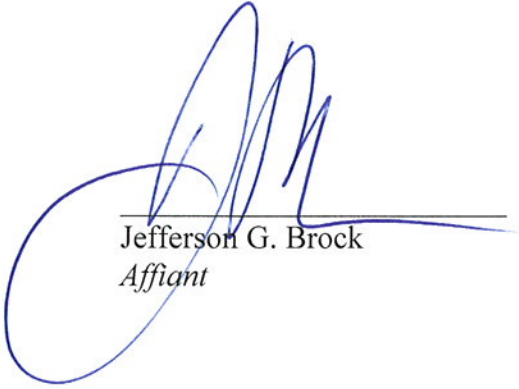
State of Georgia    )  
St. Simons Island    ) ss:  
County of Glynn    )

**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.

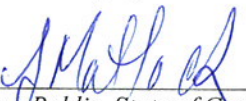
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

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