

EXHIBIT 15  
(Page 1 of 5)

MULTIPLE OWNERSHIP CONSIDERATIONS

Coltrace Communications, Inc.  
Harrison, MI

This exhibit documents that the acquisition of WVXH(FM) - Harrison, Michigan, in conjunction with the present ownership of WUPS(FM) - Houghton Lake, Michigan, will comply with the local radio ownership restrictions outlined in Section 73.3555 of the FCC Rules.

According to Version 4.02 of the BIA Financial Network's *Media Access Pro* computer software,<sup>1</sup> neither WVXH nor WUPS is considered to be "home" to any Arbitron metro market. Furthermore, neither of the communities of license for these stations (Harrison or Houghton Lake) is located within the boundaries of such a metro market. For this reason, as required by Paragraph 286 of the FCC's July 2, 2003 *Report and Order and Notice of Proposed Rulemaking* in MB Dockets 02-277, 01-235, 01-317, 00-244, and 03-130, contour overlap studies were conducted<sup>2</sup> for the market defined by the principal community contour overlap between WVXH and WUPS.

Figure 15.0 is a map exhibit depicting the principal community contours of WVXH and WUPS. These contours were projected using the notified facilities for each station from the FCC's Consolidated Database System ("CDBS") and terrain data extracted from the NGDC 30 second terrain database. As shown in this figure, there will be principal community contour overlap between WVXH and WUPS.

---

<sup>1</sup>The program databases utilized in this analysis were most recently updated on February 6, 2006.

<sup>2</sup>These contour overlap studies were conducted utilizing the modified contour overlap methodology outlined in Paragraph 285 of the FCC's July 2, 2003 *Report and Order and Notice of Proposed Rulemaking* in MB Dockets 02-277, 01-235, 01-317, 00-244, and 03-130.

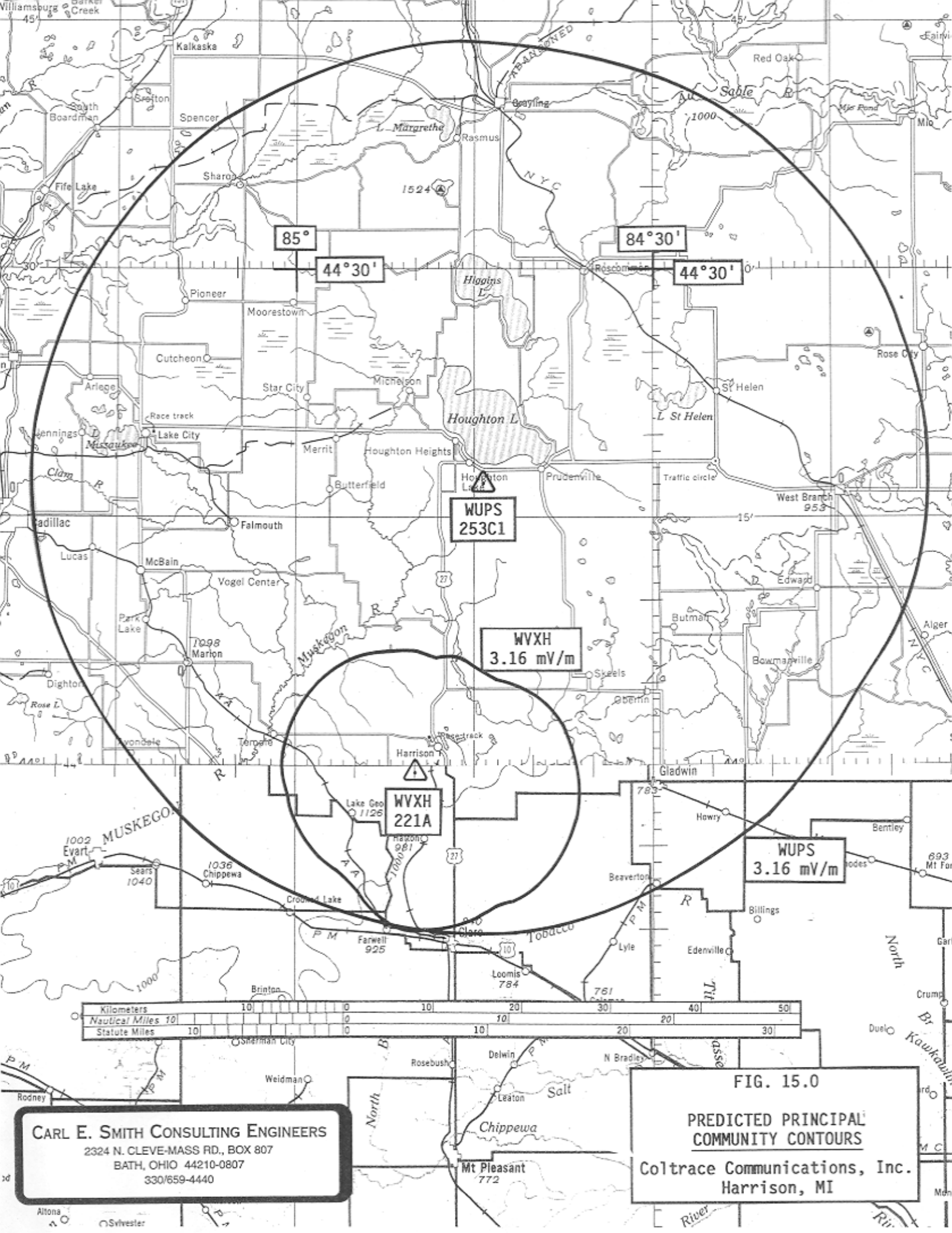


EXHIBIT 15  
(Page 2 of 5)

Figure 15.1 depicts the composite principal community contour for the contour based market defined by these two stations. Also shown in this figure are the transmitter sites of all operating stations located within this composite contour. Table 15.1 is a tabulation of the stations depicted in this figure. As shown by this data, there are thirteen stations, including WVXH and WUPS, whose transmitter sites are located within this composite principal community contour. Thus, it can be safely said that there are at least thirteen stations in the contour based market defined by these two stations. In fact, the number of stations in this market would be even greater if stations located outside this composite contour whose principal community contours overlap this composite contour were included in this total. No such further analysis is required in this case, however, since, in markets containing fourteen or fewer stations, Section 73.3555(a)(1)(iv) of the FCC Rules permits the common ownership of up to 5 commercial stations, not more than 3 of which are in the same service, provided that the total number of commonly owned stations does not exceed 50% of the stations in the market. The instant situation will involve the common ownership of two FM stations in this contour based market, which does not exceed the permitted maximum and does not exceed 50% of the stations in the market.

Based upon the above information, the proposed acquisition of WVXH will fully comply with the local radio ownership restrictions specified in Section 73.3555 of the FCC Rules.

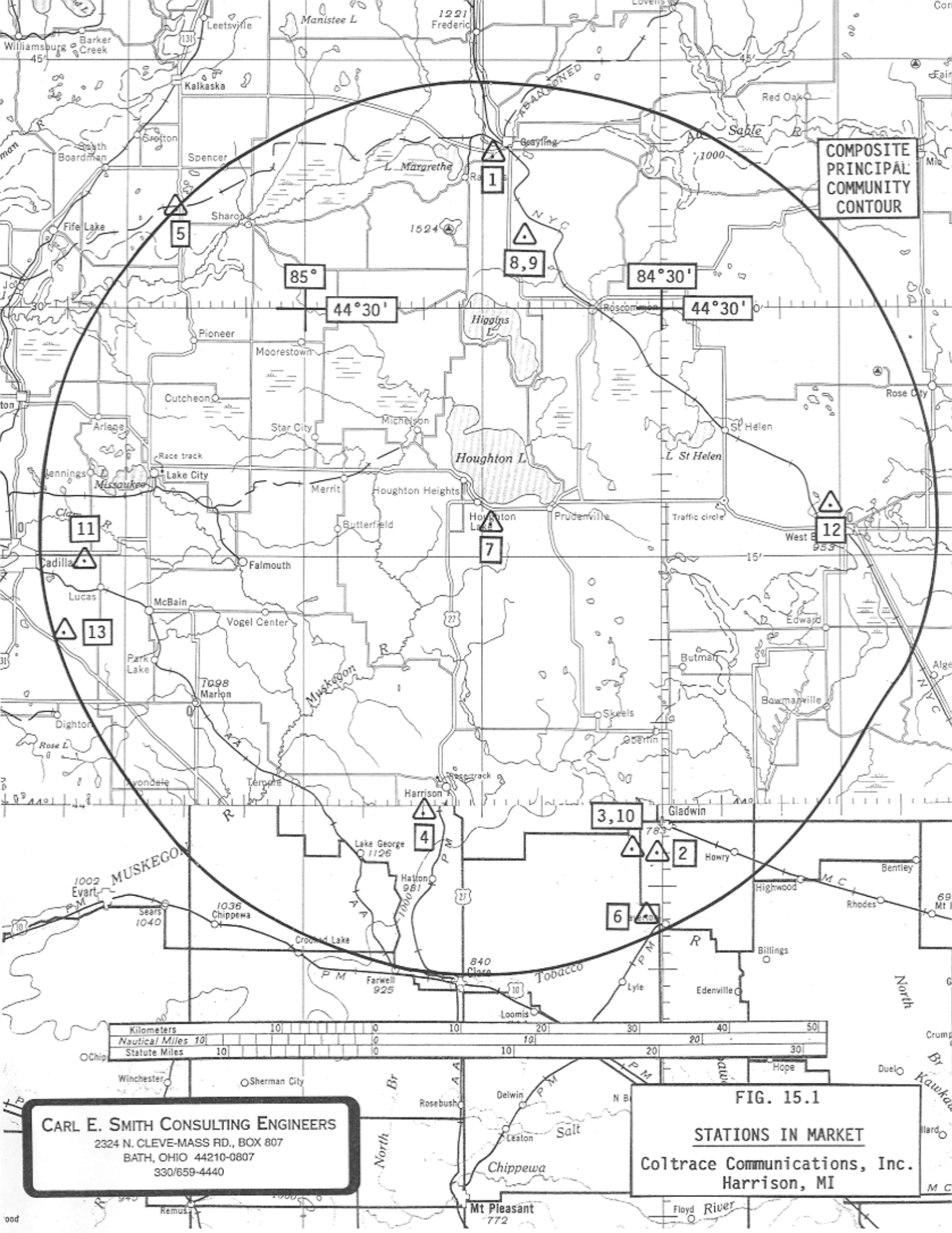




**CARL E. SMITH CONSULTING ENGINEERS**  
2324 N. CLEVE-MASS RD., BOX 807  
BATH, OHIO 44210-0807  
330/659-4440

**FIG. 15.0**  
**PREDICTED PRINCIPAL**  
**COMMUNITY CONTOURS**  
**Coltrace Communications, Inc.**  
**Harrison, MI**





COMPOSITE  
PRINCIPAL  
COMMUNITY  
CONTOUR

FIG. 15.1

STATIONS IN MARKET

Coltrace Communications, Inc.  
Harrison, MI

CARL E. SMITH CONSULTING ENGINEERS  
2324 N. CLEVE-MASS RD., BOX 807  
BATH, OHIO 44210-0807  
330/659-4440



TABLE 15.1

STATIONS IN MARKET  
Coltrace Communications, Inc.  
Harrison, MI

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
1	WGRY	1230	Grayling, MI
2	WGDN	1350	Gladwin, MI
3	WEJC	202C2	White Star, MI
4	WVXH	221A	Harrison, MI
5	WJZQ	225C1	Cadillac, MI
6	WMRX-FM	249A	Beaverton, MI
7	WUPS	253C1	Houghton Lake, MI
8	WGRY-FM	262C1	Grayling, MI
9	WQON	266A	Roscommon, MI
10	WGDN-FM	276C3	Gladwin, MI
11	WAIR	285A	Lake City, MI
12	WBMI	288A	West Branch, MI
13	WCKC	296A	Cadillac, MI