

TECHNICAL STATEMENT  
 RADIO MULTIPLE OWNERSHIP ANALYSIS  
 RED ZEBRA BROADCASTING LICENSEE, LLC

This statement and the attached figures were prepared on behalf of Red Zebra Broadcasting Licensee, LLC (RED ZEBRA). RED ZEBRA proposes to acquire the facilities of WTEM and WWRC, Washington, DC, and WTNT, Bethesda, MD. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership, time brokerage or joint sales:<sup>1</sup>

Table 1: Proposed Commonly Owned, Brokered or Jointly-Sold Stations Studied and Associated Arbitron Metro<sup>2</sup> Information

Calls	Fac ID	Band	Community	County	State	Geographic Arbitron Market	Declared Arbitron Market
WTEM	25105	AM	Washington	District of Columbia	DC	Washington, DC	Washington, DC
WTNT	11846	AM	Bethesda	Montgomery	MD	Washington, DC	Washington, DC
WWRC	8681	AM	Washington	District of Columbia	DC	Washington, DC	Washington, DC
WWXT	43277	FM	Prince Frederick	Calvert	MD	Washington, DC	Washington, DC
WWXX	16819	FM	Warrenton	Fauquier	VA	Non-Metro	Washington, DC
WXTR	70036	AM	Alexandria	Alexandria (City)	VA	Washington, DC	Washington, DC

Since certain of these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), or are located in, or home to, the same Arbitron Metro market, an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.<sup>3</sup>

RED ZEBRA does not have an attributable interest in any other station with a principal community contour that overlaps or intersects the principal community contour of, or which is located in the same Arbitron Metro<sup>4</sup>, as the stations listed in Table 1 above. The community of license of all stations is located within and reported as home to the Washington, DC Arbitron Metro with the exception of WWXX which is not licensed to a community in any

<sup>1</sup> None of the following stations are presently attributable by virtue of a time brokerage agreement or joint sales agreement, although RED ZEBRA has entered into a time brokerage agreement for WTEM, WWRC and WTNT, effective July 1, 2008.

<sup>2</sup> Arbitron data presented herein is obtained from BIA's "Media Access Pro."

<sup>3</sup> See 47 C.F.R. § 73.3555(a).

<sup>4</sup> A station is considered to be "located in an Arbitron Metro" if the station's community of license is located within the boundaries of that Metro, or, the station is listed as "Home" to that Metro by BIA.

Arbitron Metro. Contour overlap of the stations to be acquired, as depicted in Figure 1, exists only among the commonly-owned stations whose communities of license are located in the Washington, DC Arbitron Metro market, excluding the commonly owned station, WWXX, whose community of license is located outside any Arbitron Metro.

Arbitron Market Study

All stations are reported by BIA as being "Home" to the Washington, DC Metro. This proposal is in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by Table 2 below:

Table 2 - Stations Considered to be in the  
 Washington, DC Arbitron Metro<sup>5</sup>

Count	Calls	Fac ID	Band	Owner	Status <sup>6</sup>	Community	County
1	WACA	38439	AM	AC Communications	b	Wheaton	Montgomery
2	WFMD	31136	AM	Aloha Station Trust LLC	g	Frederick	Frederick
3	WFRE	31139	FM	Aloha Station Trust LLC	g	Frederick	Frederick
4	WAMU	65399	FM	American University	b	Washington	District of Columbia
5	WDMV	19235	AM	Birach Broadcasting Corporation	b	Walkersville	Frederick
6	WFED	8673	AM	Bonneville International Corp	b	Silver Spring	Montgomery
7	WWWB	47104	AM	Bonneville International Corp	g	Frederick	Frederick
8	WWWT	74120	AM	Bonneville International Corp	b	Washington	District of Columbia
9	WTLF	47105	FM	Bonneville International Corp	g	Braddock Heights	Frederick
10	WTOP-FM	11845	FM	Bonneville International Corp	b	Washington	District of Columbia
11	WWWT-FM	21636	FM	Bonneville International Corp	b	Manassas	Prince William
12	WPGC	28638	AM	CBS Radio	b	Morningside	Prince George's
13	WJFK-FM	28625	FM	CBS Radio	b	Manassas	Manassas (City)
14	WLZL	72177	FM	CBS Radio	a	Annapolis	Anne Arundel
15	WPGC-FM	28632	FM	CBS Radio	b	Morningside	Prince George's
16	WTGB-FM	9619	FM	CBS Radio	b	Bethesda	Montgomery
17	WTHU	10538	AM	Christian Radio Coalition Inc	g	Thurmont	Frederick

<sup>5</sup> Source: BIA.

<sup>6</sup> Status: "a" -- the station is reported by BIA as "Home" to this Arbitron Metro; "g" -- the station's community of license is located within the geographic boundaries of this Arbitron Metro; "b" -- the station is both listed by BIA as "Home" to this Arbitron Metro, and its community of license is located in this Arbitron Metro.

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18	WMAL	73250	AM	Citadel/ABC	b	Washington	District of Columbia
19	WJZW	70037	FM	Citadel/ABC	b	Woodbridge	Prince William
20	WRQX	73252	FM	Citadel/ABC	b	Washington	District of Columbia
21	WASH	70933	FM	Clear Channel	b	Washington	District of Columbia
22	WBIG-FM	54459	FM	Clear Channel	b	Washington	District of Columbia
23	WIHT	25080	FM	Clear Channel	b	Washington	District of Columbia
24	WMZQ-FM	73305	FM	Clear Channel	b	Washington	District of Columbia
25	WWDC	8682	FM	Clear Channel	b	Washington	District of Columbia
26	WGTS	12460	FM	Columbia Union College	b	Takoma Park	Montgomery
27	WDCT	20668	AM	Family Radio Ltd	b	Fairfax	Fairfax
28	WETA	65669	FM	Greater Washington Educational Telecomm Assoc Inc	b	Washington	District of Columbia
29	WHUR-FM	65707	FM	Howard University	b	Washington	District of Columbia
30	WMET	4643	AM	IDT Corporation	b	Gaithersburg	Montgomery
31	WPWC	25995	AM	JMK Communications	b	Dumfries-Triangle	Prince William
32	WKDV	8672	AM	Metro Radio Inc	b	Manassas	Manassas (City)
33	WMTB-FM	43919	FM	Mount Saint Mary's University	g	Emmitsburg	Frederick
34	WWGB	71245	AM	Mountain Broadcasting Corp (NJ)	b	Indian Head	Charles
35	WLXE	54506	AM	MultiCultural Radio Broadcasting Inc	b	Rockville	Montgomery
36	WZHF	73306	AM	MultiCultural Radio Broadcasting Inc	b	Arlington	Arlington
37	WAFY	3728	FM	Nassau Broadcasting Partners LP	g	Middletown	Frederick
38	WWEG	39806	FM	Nassau Broadcasting Partners LP	g	Myersville	Frederick
39	WCSP-FM	68950	FM	National Cable Satellite Corp	b	Washington	District of Columbia
40	WUST	48686	AM	New World Radio Incorporated	b	Washington	District of Columbia
41	WFAX	48732	AM	Newcomb Broadcasting	b	Falls Church	Falls Church (City)
42	WPFW	51255	FM	Pacifica Foundation	b	Washington	District of Columbia
43	WAGE	54876	AM	Potomac Radio LLC	b	Leesburg	Loudoun
44	WOL	54713	AM	Radio One Inc	b	Washington	District of Columbia
45	WYCB	7038	AM	Radio One Inc	b	Washington	District of Columbia

46	WKYS	73200	FM	Radio One Inc	b	Washington	District of Columbia
47	WMMJ	54712	FM	Radio One Inc	b	Bethesda	Montgomery
48	WPRS-FM	74212	FM	Radio One Inc	b	Waldorf	Charles
49	WTEM	25105	AM	Red Zebra Broadcasting	b	Washington	District of Columbia
50	WTNT	11846	AM	Red Zebra Broadcasting	b	Bethesda	Montgomery
51	WWRC	8681	AM	Red Zebra Broadcasting	b	Washington	District of Columbia
52	WXTR	70036	AM	Red Zebra Broadcasting	b	Alexandria	Alexandria (City)
53	WWXT	43277	FM	Red Zebra Broadcasting	b	Prince Frederick	Calvert
54	WWXX	16819	FM	Red Zebra Broadcasting	a	Warrenton	Fauquier
55	WAVA	54465	AM	Salem Communications Corporation	b	Arlington	Arlington
56	WAVA-FM	4644	FM	Salem Communications Corporation	b	Arlington	Arlington
57	WKIK	60775	AM	Somar Communications Inc	b	La Plata	Charles
58	WGRX	62205	FM	Telemedia Broadcasting	g	Falmouth	Stafford
59	WMUC-FM	69019	FM	University of Maryland	b	College Park	Prince George's
60	WCTN	59711	AM	Win Radio Broadcasting Corporation	b	Potomac-Cabin John	Montgomery
61	WTRI	67755	AM	WTRI Holding LLC	g	Brunswick	Frederick
62	WYPF	32360	FM	Your Public Radio Corporation	g	Frederick	Frederick
63	WILC	28279	AM	ZGS Communications	b	Laurel	Prince George's

#### Interim Contour-Overlap Analysis

WWXX is not geographically located in any Arbitron market; however, its principal community contour does not overlap or intersect that of any other commonly-owned station. Because the communities of all commonly-owned or attributable stations with overlapping principal contours are located in an Arbitron Metro, an interim contour-overlap analysis is not required.

#### Conclusions

In the Arbitron Radio Market studied herein, there are 63 radio stations, including the subject commonly-owned 4-AM / 2-FM stations, which are home to the Washington, DC Metro. The ownership rules permit ownership in a market including 45 or more radio stations of up to 8 stations, no more than 5 of which are in the same service. Thus, the proposed ownership of stations within the Washington, DC Metro complies with the ownership rules. With regard to WWXX, under the ownership rules it is considered to be in its own

market and is the only station RED ZEBRA owns or has attributed to it in that market. Thus, ownership of WWXX also complies with the ownership rules.

Based on the above, the proposed station ownership complies with Section 73.3555(a) of the FCC Rules.

Figure 1

