

**SECTION III  
EXHIBIT 16**

**Multiple Ownership**

WLGD(FM), the station subject to the instant application, is “home” to the Wilmington, NC, Arbitron Metro (the “Wilmington Metro”). A total of 25 commercial and noncommercial educational full-power radio stations are located within or are reported by BIA as “home” to the Wilmington Metro.<sup>1</sup>

A separate assignment application filed contemporaneously with the instant application proposes the divestiture of Assignee’s and its attributable parties’ interests in the following station which is also located in the Wilmington Metro:

<b>Call Sign</b>	<b>Location</b>	<b>Facility ID No.</b>
WSFM(FM)	Oak Island, NC	48626

Subject to the consummation of the divestiture of the above-referenced station, grant of the instant application would result in the Assignee and its attributable parties having cognizable interests in the following four (4) commercial full-power FM stations and one (1) commercial full-power AM station in the Wilmington Metro (the “Wilmington Stations”):

<b>Call Sign</b>	<b>Location</b>	<b>Facility ID No.</b>
WAZO(FM)	Southport, NC	59480
WILT(FM)	Wilmington, NC	74159
WKXB(FM)	Boiling Spring Lakes, NC	59481
WLGD(FM)	Jacksonville, NC	47884
WMFD(AM)	Wilmington, NC	61701

Other than the above combination of stations, neither the Assignee nor its attributable parties would have any attributable interests in any other full power broadcast station or daily newspaper in the Wilmington Metro.

Pursuant to Section 73.3555 of the Commission’s rules, in a Metro reported by BIA as having between 15 and 29 commercial and noncommercial full-power radio stations, a party may

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<sup>1</sup> See BIA FCC Geographic Market Definition for Wilmington, NC, September 16, 2010.

have a cognizable interest in up to six (6) full-power commercial radio stations, not more than four (4) of which are in the same service.

Accordingly, the Assignee's proposed combination of four (4) FM stations and one (1) AM station in the Wilmington Metro complies with the Commission's multiple ownership rules under the Arbitron Metro Methodology (subject to the divestiture of WFSM(FM)).

In addition, because WLGD(FM)'s community of license is not within the geographic boundaries of the Wilmington Metro, the Assignee has conducted a multiple ownership study under the Interim Contour-Overlap Methodology. A technical statement attached hereto concludes that the proposed assignment of WLGD(FM) to the Assignee complies with the Commission's multiple ownership rules under the Interim Contour-Overlap Methodology.

Furthermore, while the Assignee's attributable parties have attributable interests in television stations WRAL-TV, Raleigh, North Carolina, and WRAZ(TV), Raleigh, North Carolina, as the attached technical statement demonstrates, the Noise Limited Service Contours of WRAL-TV and WRAZ(TV) do not encompass any portion of the communities of license of the Wilmington Radio Stations. Accordingly, the proposed assignment of WLGD(FM) to Assignee complies with the Commission's joint television/radio ownership rule.

For the foregoing reasons, the Assignee's proposed acquisition of WLGD(FM) complies with the Commission's multiple ownership rules, and therefore, Assignee respectfully requests that the Commission grant the instant application subject to the condition that the consummation of the divestiture of WFSM(FM) occur prior to or simultaneous with the consummation of the assignment of WLGD(FM) to Assignee.

\* \* \* \* \*

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
AND RADIO-TELEVISION CROSS-OWNERSHIP ANALYSIS  
WILMINGTON, NORTH CAROLINA

These radio multiple ownership and radio-television cross ownership analyses were prepared on behalf of Sunrise Broadcasting, LLC, concerning the ownership of radio stations in the Wilmington, North Carolina market. The radio multiple ownership analysis was prepared under the FCC interim contour analysis method.\* The following stations were analyzed:†

Call Sign	City of License	Facilities
WMFD(AM)	Wilmington, NC	630 kHz, 0.8 kW-D, 1 kW-N, U, DA-2
WLGD(FM)	Jacksonville, NC	Ch. 254C1, 100 kW, 297 m
WKXB(FM)	Boiling Spring Lakes, NC	Ch. 260C2, 35 kW, 178 m
WILT(FM)	Wilmington, NC	Ch. 283A, 3.1 kW, 137 m
WAZO(FM)	Southport, NC	Ch. 298C1, 75 kW, 137 m

The principal community contours of all of these stations are depicted on a map included herein as Figure 1. The radio multiple ownership analysis considers only those stations with overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations). An ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

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\* See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

† It is noted that any attributable ownership in WSFM(FM), Oak Island, NC is to be divested.

Radio Markets

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. As listed in the table below, there is one defined “radio market” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	WMFD	WLGD, WKXB, WILT, WAZO

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations that have principal community contours that intersect the principal community contours that define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations, other than those that form the market in question were not considered in the count of stations in the defined market. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	12 AM; 25 FM; 37 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio market. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission’s AM database and the appropriate Ground Wave Field Strength versus

Distance Graph described in Section 73.184 of the FCC Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the U.S.G.S. 3-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules concerning radio multiple ownership.

Radio-Television Cross-Ownership Analysis

There is attributable ownership interest in the television stations WRAL-TV, Channel 48; and, WRAZ(TV), Channel 49, both licensed to Raleigh, North Carolina. A radio-television cross-ownership analysis was prepared in consideration of the radio stations to be owned in the Wilmington market and WRAL-TV and WRAZ(TV). The analysis indicates that the predicted noise-limited (N.L.) contours of neither WRAL-TV nor WRAZ(TV) overlap with any of the subject radio stations' respective communities of license. The attached Figure 3 demonstrates the results of the analysis. Therefore it is concluded that the proposed combination of stations complies with the FCC's requirements concerning radio-television cross-ownership.



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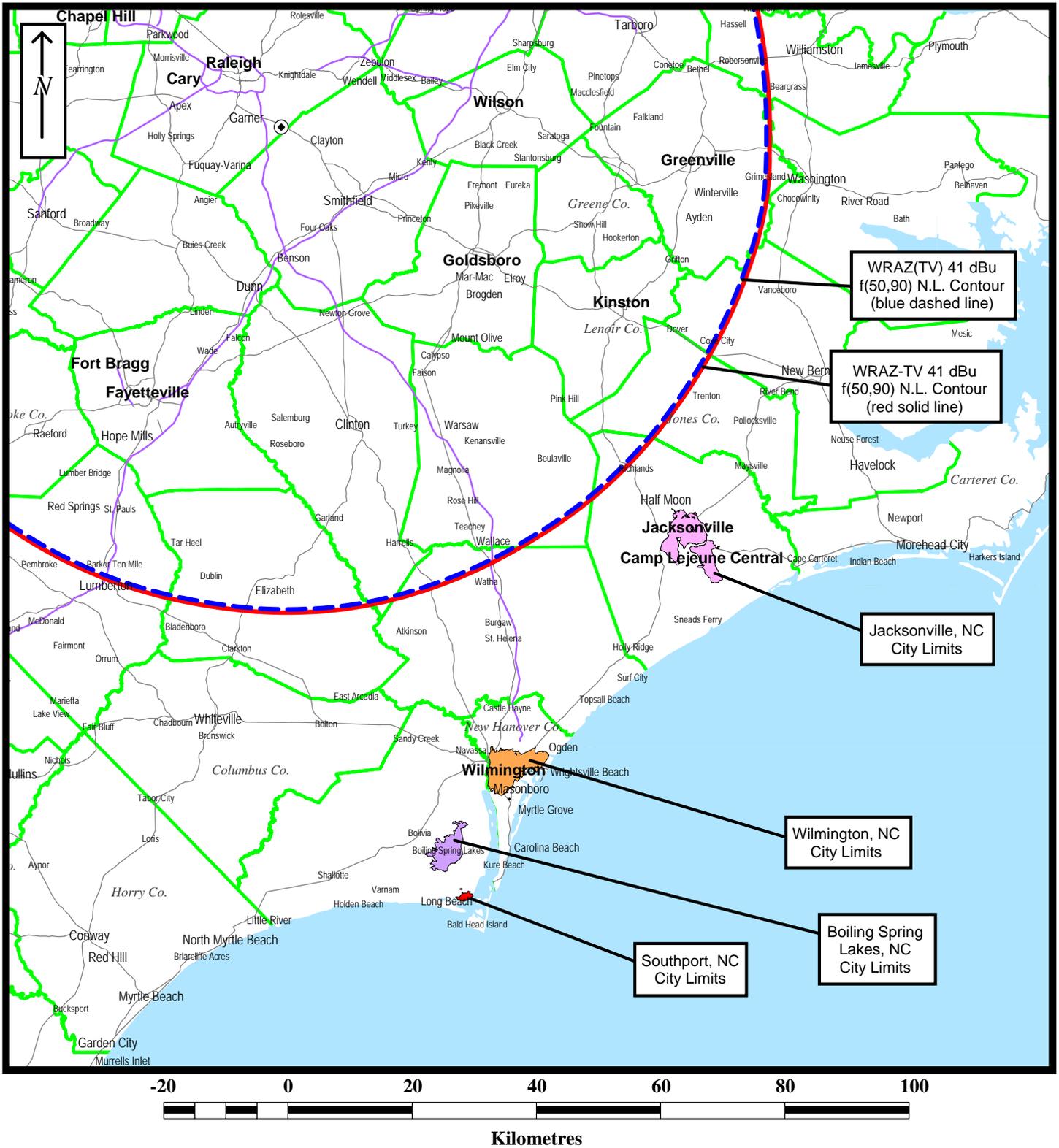


TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
WILMINGTON, NORTH CAROLINA

Tabulation of Stations in Radio Markets

<b>Market 1</b>	
Number	Station
<b>AM Stations</b>	
1	WMFD, WILMINGTON, NC, 630 kHz
2	WEGG, ROSE HILL, NC, 710 kHz
3	WAAV, LELAND, NC, 980 kHz
4	WSME, CAMP LEJEUNE, NC, 1120 kHz
5	WMYT, CAROLINA BEACH, NC, 1180 kHz
6	WJNC, JACKSONVILLE, NC, 1240 kHz
7	WJCV, JACKSONVILLE, NC, 1290 kHz
8	WLSG, WILMINGTON, NC, 1340 kHz
9	WAVQ, JACKSONVILLE, NC, 1400 kHz
10	WVCB, SHALLOTTE, NC, 1410 kHz
11	WVBS, BURGAW, NC, 1470 kHz
12	WWIL, WILMINGTON, NC, 1490 kHz
<b>FM Stations</b>	
1	WGHW, LOCKWOODS FOLLY TOWN, NC, Channel 201
2	WZDG, SCOTTS HILL, NC, Channel 203
3	WKVC, NORTH MYRTLE BEACH, SC, Channel 205
4	WDVV, WILMINGTON, NC, Channel 209
5	WJKA, JACKSONVILLE, NC, Channel 211
6	WWIL-FM, WILMINGTON, NC, Channel 213
7	WHQR, WILMINGTON, NC, Channel 217
8	WQSL, JACKSONVILLE, NC, Channel 222
9	WLQB, OCEAN ISLE BEACH, NC, Channel 228
10	WNTB, TOPSAIL BEACH, NC, Channel 229
11	WZKB, WALLACE, NC, Channel 232
12	WKXS-FM, LELAND, NC, Channel 233
13	WMNX, WILMINGTON, NC, Channel 247
14	WSFM, OAK ISLAND, NC, Channel 252
15	WLGD, JACKSONVILLE, NC, Channel 254
16	WKXB, BOILING SPRING LAKES, NC, Channel 260
17	WWQQ-FM, WILMINGTON, NC, Channel 267
18	WGNI, WILMINGTON, NC, Channel 274

<b>Market 1</b>	
<b>Number</b>	<b>Station</b>
19	WBNE, WRIGHTSVILLE BEACH, NC, Channel 279
20	WKGV, SWANSBORO, NC, Channel 281
21	WILT, WILMINGTON, NC, Channel 283
22	WXQR-FM, JACKSONVILLE, NC, Channel 288
23	WLTT, BOLIVIA, NC, Channel 292
24	WUIN, CAROLINA BEACH, NC, Channel 294
25	WAZO, SOUTHPORT, NC, Channel 298



# TELEVISION CROSS-OWNERSHIP ANALYSIS MAP

duTreil, Lundin & Rackley, Inc. Sarasota, Florida