

**ENGINEERING REPORT**  
**Duopoly Showing**  
**For the Purchase of**  
**WPON(AM) – Walled Lake, MI**

**April 2004**

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**MUNN-REESE, INC.**  
Broadcast Engineering Consultants  
Coldwater, MI 49036

This firm was retained to prepare a study to determine the number of principal community radio contours available from stations authorized for commercial service within the radio market defined by the principal community contours of WPON(AM), Walled Lake, MI; WCXI(AM), Fenton, MI; and WNZK(AM), Dearborn Heights, MI. The study covers the purchase of WPON(AM).

The existing facilities of the stations included in this report were determined by the use of currently updated copies of the FCC computer databases of AM stations. The listed facilities served as the basis for the computation of the respective principal community contours as defined in §73.3555 (a)(3)(i) of the Rules, as revised by the Telecommunications Act of 1996. The accuracy of the results of this study is understood to be limited to the accuracy of these databases. All facilities in this study are known to be operating. Only licensed facilities were used for the study.

For AM stations, Map M-3 soil conductivity values and the authorized licensed transmitting facilities served as the basis for the computation of the predicted 5.0 mV/m groundwave contour in accordance with §73.183 of the FCC Rules. The distance to the contour was computed for seventy-two (72) equally spaced azimuths beginning with 0° True.

Figure 1 is a map showing WPON(AM) and all stations in the vicinity that are owned or controlled by the purchaser. Figure 1 demonstrates that, of the purchaser's present owned or controlled stations, only WCXI(AM), Fenton, MI and WNZK(AM), Dearborn Heights, MI has overlapping contours with WPON(AM). Figure 2 is a map showing that there are four other AM stations that enter the market defined by principal city contours of WPON/WCXI/WNZK.

The radio market has been defined, in accordance with §73.3555 (a)(3)(ii) of the FCC Rules, as revised by the Telecommunications Act of 1996, as the area within the total perimeter formed by the combined principal community contours of WPON(AM), WCXI(AM), and WNZK(AM).

Upon completion of this study, it was determined that pursuant to §73.3555 (a)(1)(iv) of the Rules, as revised by the Telecommunications Act of 1996, more than enough stations had been found to permit the common control of the three stations defining this radio market.

In addition to the three stations defining the market area, the principal community contours of the four (4) other AM stations entering the market are shown in Figure 2. Including the three (3) stations which define the market area, and considering the minimum four (4) other stations entering this market, it is shown that control of less than 50% of the market is achieved per §73.3555(a)(1)(iv). A box is provided in Figure 2 that details the information for the four stations entering this market.

**ENGINEERING STATEMENT**

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**CERTIFICATION**


I hereby certify, subject to penalties for perjury, that the contents of this Engineering Statement are true and accurate to the best of my knowledge and belief.

April 9, 2004

Munn-Reese, Inc.

P.O. Box 220  
Coldwater, MI 49036

By

  
Wayne S. Reese, President

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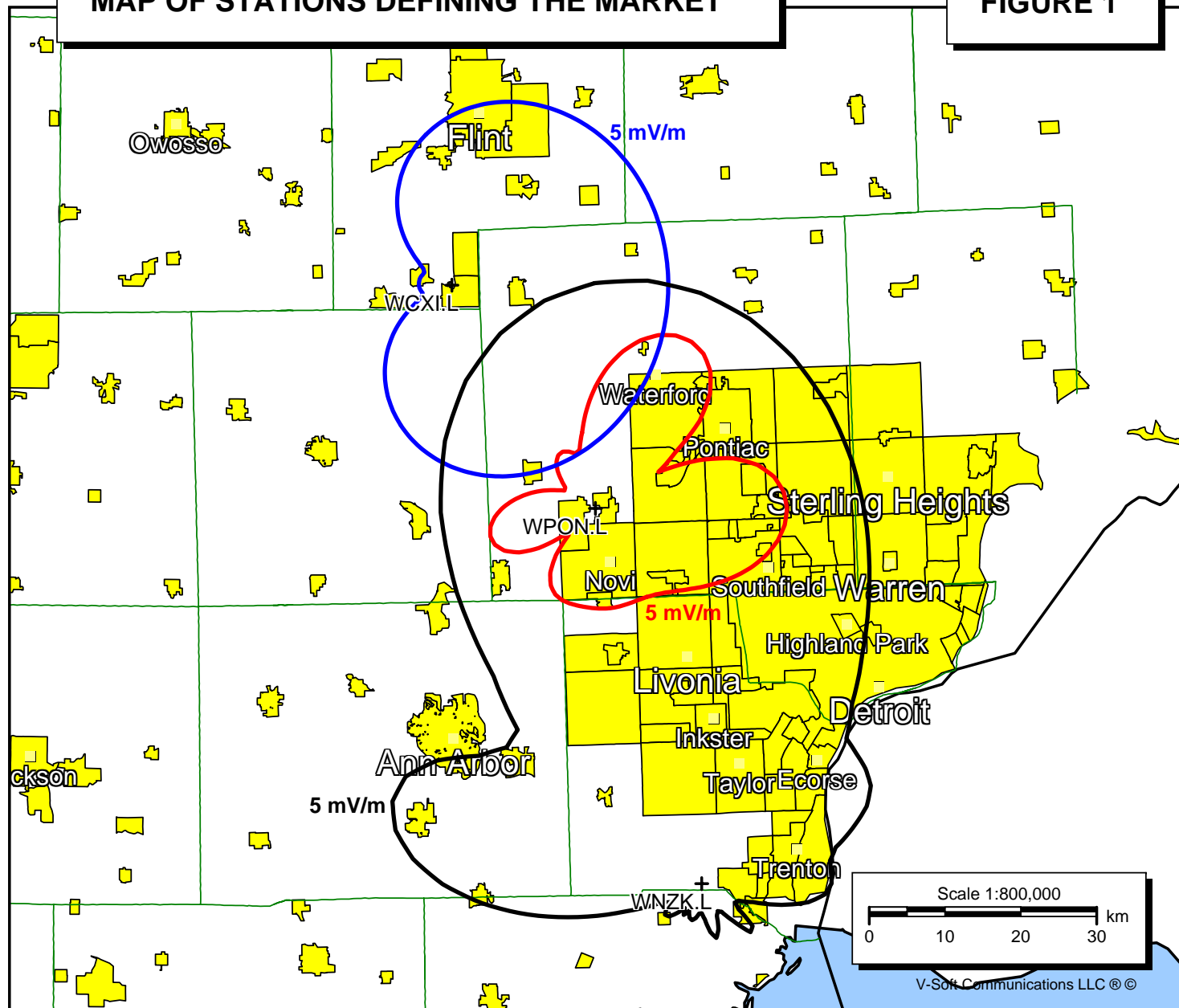
## MAP OF STATIONS DEFINING THE MARKET

FIGURE 1

WPON.L  
Walled Lake, MI  
Freq: 1460 kHz  
Class: B  
Latitude: 42-32-38 N  
Longitude: 083-29-58 W  
Power: 1 kW  
RMS: 299.07 mV/m @1km  
# Towers: 4  
# Augs: 0

WCXI.L  
Fenton, MI  
Freq: 1160 kHz  
Class: B  
Latitude: 42-48-30 N  
Longitude: 083-43-50 W  
Power: 1 kW  
RMS: 310.56 mV/m @1km  
# Towers: 2  
# Augs: 2

WNZK.L  
Dearborn Heights, MI  
Freq: 690 kHz  
Class: B  
Latitude: 42-05-55 N  
Longitude: 083-19-48 W  
Power: 2.5 kW  
RMS: 489.2 mV/m @1km  
# Towers: 6  
# Augs: 8



WPON.L  
Walled Lake, MI  
Freq: 1460 kHz  
Latitude: 42-32-38 N  
Longitude: 083-29-58 W  
Power: 1 kW

WCXI.L  
Fenton, MI  
Freq: 1160 kHz  
Latitude: 42-48-30 N  
Longitude: 083-43-50 W  
Power: 1 kW

WNZK.L  
Dearborn Heights, MI  
Freq: 690 kHz  
Latitude: 42-05-55 N  
Longitude: 083-19-48 W  
Power: 2.5 kW

WJR.L  
Detroit, MI  
Freq: 760 kHz  
Latitude: 42-10-05 N  
Longitude: 083-12-54 W  
Power: 50 kW

WWJ.L  
Detroit, MI  
Freq: 950 kHz  
Latitude: 42-01-09 N  
Longitude: 083-14-23 W  
Power: 50 kW

WXYT.L  
Detroit, MI  
Freq: 1270 kHz  
Latitude: 42-01-39 N  
Longitude: 083-20-42 W  
Power: 50 kW

## MAP SHOWING STATIONS ENTERING THE MARKET

FIGURE 2

