

**EXPLANATION OF COMPLIANCE
WITH
MULTIPLE OWNERSHIP RULES**

Fred Eychaner, through common ownership, presently holds an attributable interest in four stations in the Chicago radio market: WAIT(AM), Crystal Lake, IL; WCFJ(AM), Chicago Heights, IL; WCSN(AM) and WSBC(AM), Chicago, IL. With the simultaneous acquisitions of WRZA(FM) by WCLR, Inc., and WNDZ(AM), by a sister entity, WNDZ, Inc., Mr. Eychaner will hold an attributable interest in five AM stations, and one FM station, in the Chicago radio market.

The attached statement of Louis Robert du Treil, Jr., P.E., demonstrates that assignment of WRZA(FM) and WNDZ(AM) to entities commonly owned by Mr. Eychaner, as described above, are permitted under Section 73.3555(a)(1)(i) of the FCC rules, as the overlapping relevant contour of the commonly-owned stations include 45 radio stations. Hence, ownership of up to eight commercial radio stations, of which not more than five stations may be in the same service (AM or FM) is permitted.

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CHICAGO, ILLINOIS

This radio multiple ownership analysis was prepared concerning the proposed acquisition of WNDZ(AM), Portage, Indiana and WRZA(FM), Park Forest, Illinois, which are both located in the Chicago, Illinois area. The following nearby radio stations will have a common attributable interest in the Chicago area:

Call Sign	City of License	Facilities
WNDZ(AM)	Portage-IN	750 kHz, 5 kW-D, DA-D
WCSN(AM)	Chicago-IL	820 kHz, 5 kW, D
WAIT(AM)	Crystal Lake-IL	850 kHz, 2.5 kW, DA-D [*]
WSBC(AM)	Chicago-IL	1240 kHz, 1 kW, U
WCFJ(AM)	Chicago-IL	1470 kHz, 1 kW, U
WRZA(FM)	Park Forest, IL	Channel 260B, 50 kW, 150 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.

Radio Markets

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal

^{*} Shown for reference. There is no principal community contour overlap with the WNDZ(AM) or WRZA(FM) facilities.

community contours of the stations proposed to be commonly owned. As listed in the table below, there are two defined “radio markets” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	WNDZ, WCSN, WCFJ	WRZA
Market 2	WNDZ, WCSN, WSBC	--

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 operating, licensed commercial stations were counted. The results of the analysis are tabulated below:[†]

Defined Radio Market	Number of Stations in Radio Market
Market 1	19 AM; 26 FM; 45 Total
Market 2	19 AM; 26 FM; 45 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio markets. Only known licensed, operating, commercial 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

[†] Only stations with overlap of both Markets 1 and 2 were included in the count of stations.

derived from the U.S.G.S. 3-second computer database for each of the FM stations using radials evenly-spaced every 2 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.

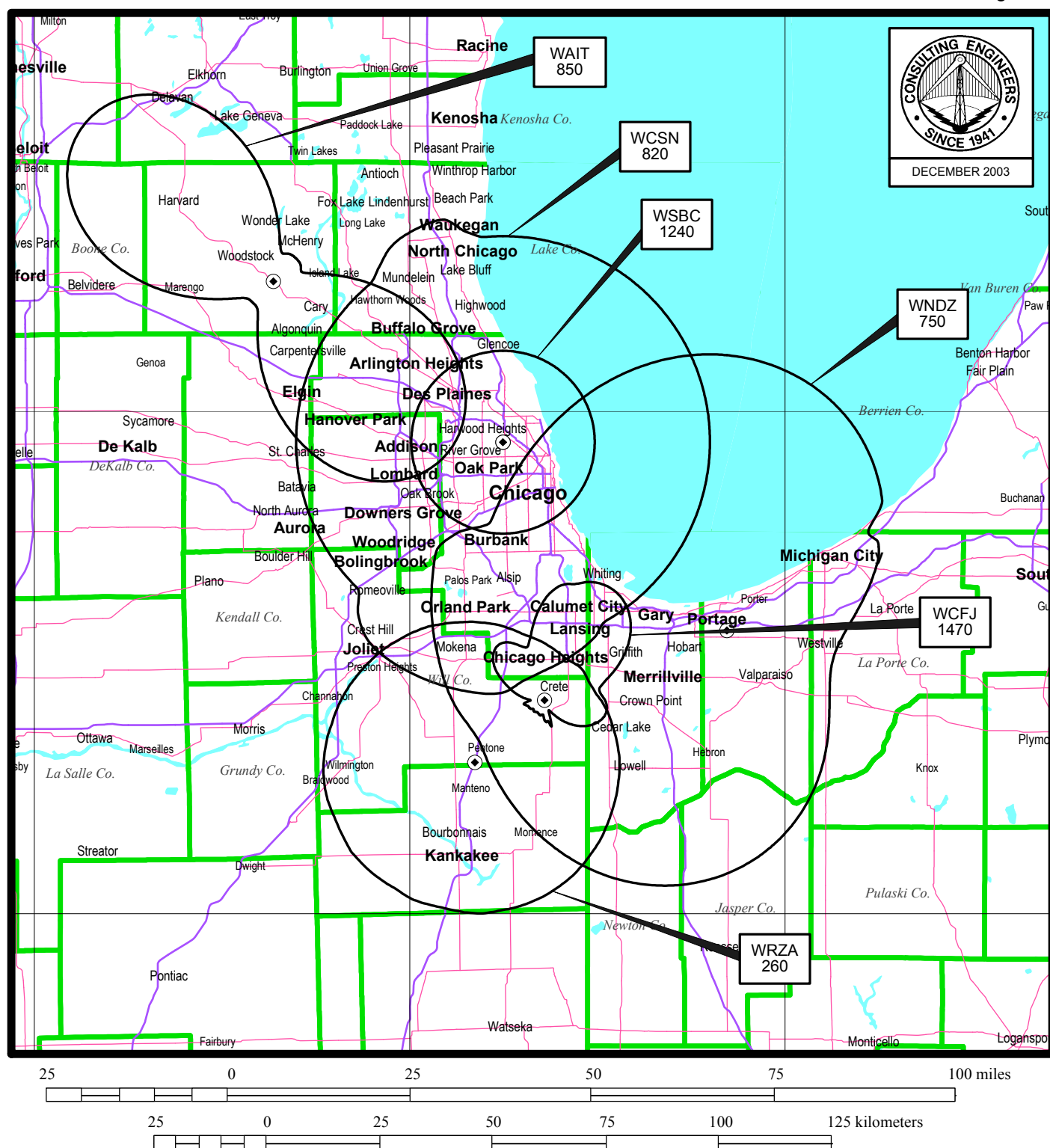


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Figure 1



PREDICTED PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CHICAGO, ILLINOIS

Tabulation of Stations in Radio Markets

Market 1	
Number	Station
AM Stations	
1	WIND, CHICAGO, IL, 560 kHz
2	WNDZ, PORTAGE, IN, 750 kHz
3	WCSN, CHICAGO, IL, 820 kHz
4	WLS, CHICAGO, IL, 890 kHz
5	WNTD, CHICAGO, IL, 950 kHz
6	WNWI, OAK LAWN, IL, 1080 kHz
7	WRTO, CHICAGO, IL, 1200 kHz
8	WJOB, HAMMOND, IN, 1230 kHz
9	WSBC, CHICAGO, IL, 1240 kHz
10	WWCA, GARY, IN, 1270 kHz
12	WRDZ, LA GRANGE, IL, 1300 kHz
13	WLTH, GARY, IN, 1370 kHz
14	WGCI, CHICAGO, IL, 1390 kHz
15	WCEV, CICERO, IL, 1450 kHz
16	WVON, CICERO, IL, 1450 kHz
17	WCFJ, CHICAGO HEIGHTS, IL, 1470 kHz
18	WPNA, OAK PARK, IL, 1490 kHz
19	WBGX, HARVEY, IL, 1570 kHz
FM Stations	
1	WPWX, HAMMOND, IN, Channel 222
2	WXRT-F, CHICAGO, IL, Channel 226
3	WVIX, JOLIET, IL, Channel 228
4	WLIT-F, CHICAGO, IL, Channel 230
5	WZZN, CHICAGO, IL, Channel 234
6	WNUA, CHICAGO, IL, Channel 238
7	WBBM-F, CHICAGO, IL, Channel 242
8	WLLI-F, JOLIET, IL, Channel 244
9	WDRV, CHICAGO, IL, Channel 246
10	WLUP-F, CHICAGO, IL, Channel 250
12	WFMT, CHICAGO, IL, Channel 254

Market 1	
Number	Station
13	WUSN, CHICAGO, IL, Channel 258
14	WRZA, PARK FOREST, IL, Channel 260
15	WNND, CHICAGO, IL, Channel 262
16	WKQX, CHICAGO, IL, Channel 266
17	WTMX, SKOKIE, IL, Channel 270
18	WYCA, CRETE, IL, Channel 272
19	WVAZ, OAK PARK, IL, Channel 274
20	WKSC-F, CHICAGO, IL, Channel 278
21	WXRD, CROWN POINT, IN, Channel 280
22	WJMK, CHICAGO, IL, Channel 282
23	WOJO, EVANSTON, IL, Channel 286
24	WCKG, ELMWOOD PARK, IL, Channel 290
25	WSRB, LANSING, IL, Channel 292
26	WZVN, LOWELL, IN, Channel 296