

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
CC LICENSES, LLC

This statement and the attached figures were prepared on behalf of CC Licenses, LLC ("CCL"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCL proposes to modify the facilities of WJCD(FM), Norfolk, VA. 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
WCDG	70345	FM	Moyock	Currituck	NC	Norfolk-Virginia Beach-Newport News, VA	Norfolk-Virginia Beach-Newport News, VA
WJCD	31123	FM	Norfolk	Norfolk (City)	VA	Norfolk-Virginia Beach-Newport News, VA	Norfolk-Virginia Beach-Newport News, VA
WKUS	69570	FM	Windsor	Isle of Wight	VA	Non-Metro	Norfolk-Virginia Beach-Newport News, VA
WOWI	69558	FM	Norfolk	Norfolk (City)	VA	Norfolk-Virginia Beach-Newport News, VA	Norfolk-Virginia Beach-Newport News, VA

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>

CCC does not have an attributable interest in any other station with a principal community contour that overlaps or intersects the principal community contour of WJCD(FM) as proposed, or which is located in the same

<sup>1</sup> None of the following stations are attributable by virtue of a time brokerage agreement or joint sales agreement.

<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).

Arbitron Metro<sup>4</sup> as WJCD(FM). The community of license of WJCD(FM) is located within the Norfolk-Virginia Beach-Newport News, VA Arbitron Metro, and WJCD(FM) is reported by BIA as being "Home" to that Metro. Contour overlap of the station to be modified, as depicted in Figure 1, also occurs with commonly-owned stations whose communities of license are located in the Norfolk-Virginia Beach-Newport News, VA Arbitron Metro market, and commonly owned stations whose communities of license are located outside any Arbitron Metro market.

#### Arbitron Market Study

WJCD(FM) is reported by BIA as being "Home" to the Norfolk-Virginia Beach-Newport News, VA 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 Norfolk-Virginia Beach-Newport News, VA Arbitron Metro<sup>5</sup>

Count	Calls	Fac ID	Band	Owner	Status <sup>6</sup>	Community	County
1	WHKT	87170	AM	ABC/Disney	b	Portsmouth	Portsmouth (City)
2	WYFI	5143	FM	Bible Broadcasting Network	b	Norfolk	Norfolk (City)
3	WBVA	84068	AM	Birach Broadcasting Corporation	b	Bayside	Virginia Beach (City)
4	WVAB	57611	AM	Birach Broadcasting Corporation	b	Virginia Beach	Virginia Beach (City)
5	WCDG	70345	FM	Clear Channel Communications Inc	a	Moyock	Currituck
6	WJCD	31123	FM	Clear Channel Communications Inc	b	Norfolk	Norfolk (City)
7	WKUS	69570	FM	Clear Channel Communications Inc	a	Windsor	Isle of Wight
8	WOWI	69558	FM	Clear Channel Communications Inc	b	Norfolk	Norfolk (City)
9	WFOS	10757	FM	Chesapeake Public Schools	b	Chesapeake	Chesapeake (City)
10	WRJR	10759	AM	ABC/Disney	b	Portsmouth	Portsmouth (City)
11	WTJZ	3533	AM	Chesapeake-Portsmouth Broadcasting Corporation	b	Newport News	Newport News (City)

<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.

<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.

12	WCWM	65555	FM	College of William & Mary	b	Williamsburg	Williamsburg (City)
13	WYCS	66672	FM	Creative Educational Media Corp Inc	b	Yorktown	York
14	WBQK	73906	FM	Davis Media LLC	a	West Point	King William
15	WNVZ	40755	FM	Entercom	b	Norfolk	Norfolk (City)
16	WPTE	64004	FM	Entercom	b	Virginia Beach	Virginia Beach (City)
17	WVKL	4672	FM	Entercom	b	Norfolk	Norfolk (City)
18	WWDE-FM	40753	FM	Entercom	b	Hampton	Hampton (City)
19	WVXX	71286	AM	Golden Door Broadcasting LLC	b	Norfolk	Norfolk (City)
20	WMBG	25021	AM	Granger, Gregory	b	Williamsburg	York
21	WHRO-FM	25940	FM	Hampton Roads Educational Telecomm Association Inc	b	Norfolk	Norfolk (City)
22	WHRV	25933	FM	Hampton Roads Educational Telecomm Association Inc	b	Norfolk	Norfolk (City)
23	WHOV	25952	FM	Hampton University	b	Hampton	Hampton (City)
24	WGH	72103	AM	Max Media LLC	b	Newport News	Newport News (City)
25	WGH-FM	72102	FM	Max Media LLC	b	Newport News	Newport News (City)
26	WVBW	64000	FM	Max Media LLC	b	Suffolk	Suffolk (City)
27	WXEZ	19836	FM	Max Media LLC	b	Yorktown	York
28	WXMM	71287	FM	Max Media LLC	b	Norfolk	Norfolk (City)
29	WNSB	49021	FM	Norfolk State University	b	Norfolk	Norfolk (City)
30	WXTG	25917	AM	Red Zebra Broadcasting	b	Hampton	Hampton (City)
31	WXTG-FM	14327	FM	Red Zebra Broadcasting	b	Virginia Beach	Virginia Beach (City)
32	WAFX	67082	FM	Saga Communications Inc	b	Suffolk	Suffolk (City)
33	WJOI	67081	AM	Saga Communications Inc	b	Norfolk	Norfolk (City)
34	WNOR	67080	FM	Saga Communications Inc	b	Norfolk	Norfolk (City)
35	WNIS	4671	AM	Sinclair Telecable Inc	b	Norfolk	Norfolk (City)
36	WPYA	73184	FM	Sinclair Telecable Inc	b	Chesapeake	Chesapeake City (City)
37	WROX-FM	60479	FM	Sinclair Telecable Inc	a	Exmore	Northampton
38	WTAR	60472	AM	Sinclair Telecable Inc	b	Norfolk	Norfolk (City)
39	WUSH	78447	FM	Sinclair Telecable Inc	b	Poquoson	Poquoson
40	WJLZ	69636	FM	Virginia Beach Educational Broadcasting Foundation	b	Virginia Beach	Virginia Beach (City)
41	WCPK	64003	AM	Willis Broadcasting Corporation	b	Chesapeake	Chesapeake City (City)
42	WGPL	69560	AM	Willis Family Broadcasting	b	Portsmouth	Portsmouth (City)

43	WPCE	72813	AM	Willis Family Broadcasting	b	Portsmouth	Portsmouth (City)
44	WYRM	29597	AM	Word Broadcasting	b	Norfolk	Norfolk (City)
45	WXGM	74208	AM	WXGM Inc	b	Gloucester	Gloucester
46	WXGM-FM	74209	FM	WXGM Inc	b	Gloucester	Gloucester

### Interim Contour-Overlap Analysis

Because the proposed principal community contour of the station to be modified intersects the principal community contour of a station under common ownership or attribution whose community of license is located outside any Arbitron Metro, an interim contour-overlap analysis is also set forth in this statement.

### Interim Contour-Based Radio Markets

A "radio market" under the interim contour-overlap method is the area encompassed by the mutually overlapping principal community contours of the stations under common-ownership or attribution. Here, such mutually overlapping contours form one "radio market" for interim contour-overlap analysis under the Commission's rules.

The "radio market" is defined by the mutually overlapping principal community contours of WJCD, WCDG, WKUS, and WOWI. The predicted principal community contours of these stations (4 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 2*. *Figure 3* is the tabulation of some of the radio stations identified in the contour-overlap "radio market."

### Count of Stations in Defined Markets

The number of radio stations in a contour-overlap "radio market" is determined by counting the operating stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject commonly owned or attributable stations, excluding any stations whose transmitter sites are further than 92 kilometers from the perimeter of mutual overlap, and excluding any commonly owned or attributable stations that do not serve to define the market.

In the interim contour-overlap "radio market" studied herein, there are at least 45 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure 3* is the tabulation of some of the radio stations identified in the contour-overlap "radio market".

Only known licensed, operating radio stations were included in this tabulation. Distances to contours for AM stations were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 C.F.R. § 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 C.F.R. § 73.313. Terrain data was derived from the N.G.D.C. 30 second computer database for each of the FM stations using radials spaced every 45 degrees of azimuth.

### Conclusions

In the Arbitron Metro market studied herein, there are at least 46 radio stations, including the subject commonly-owned 4-FM stations, which are home to the Norfolk-Virginia Beach-Newport News, VA Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

In the interim contour-overlap "radio market" studied herein, there are at least 45 stations, including the commonly-owned 4-FM stations.

Based on the above, it is concluded that the proposed modification complies with Section 73.3555(a) of the FCC Rules.

Respectfully submitted,

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Figure 1

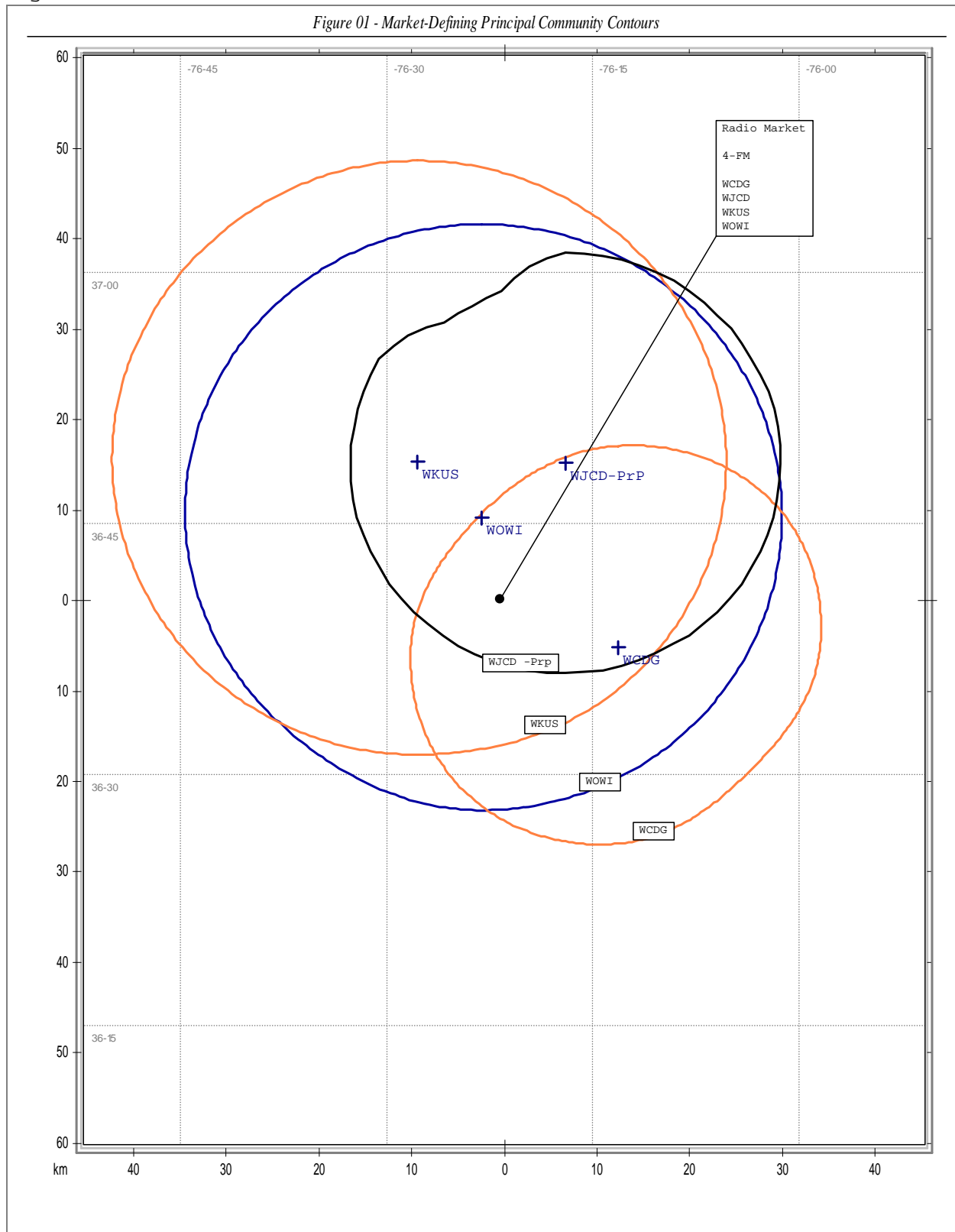


Figure 2

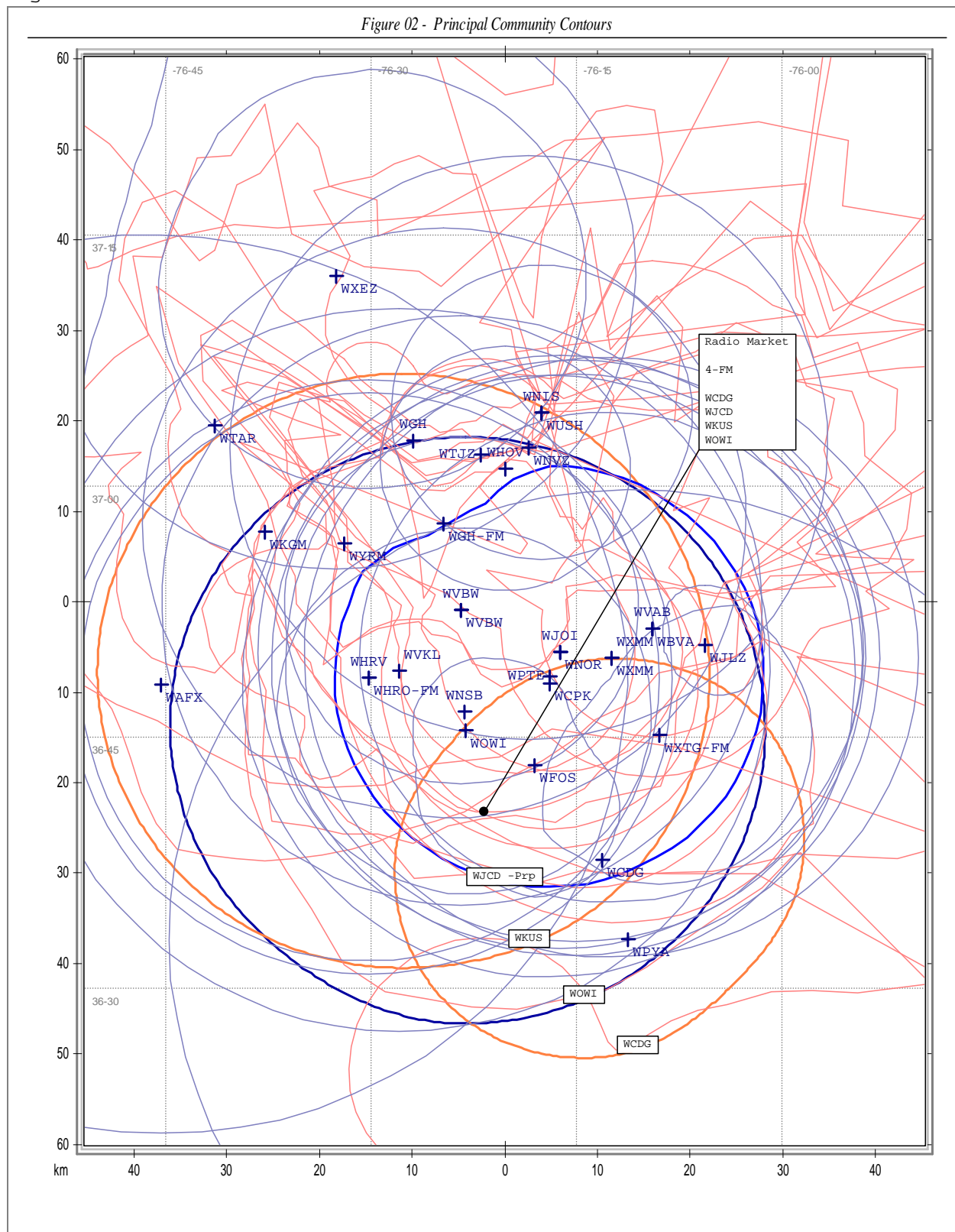


Figure 3 – Tabulation of stations in Radio Market

Count	Call Sign	Fac_id	Licensee	Dist_km
1	WYFI	5143	BIBLE BROADCASTING NETWORK, INC.	19.56
2	WBVA	84068	BIRACH BROADCASTING CORPORATION	27.13
3	WVAB	57611	BIRACH BROADCASTING CORPORATION	27.13
4	WOWI	69558	CC LICENSES, LLC	9.47
5	WKUS	69570	CC LICENSES, LLC	17.95
6	WCDG	70345	CC LICENSES, LLC	13.47
7	WJCD- PrP	31123	CC LICENSES, LLC	16.54
8	WFOS	10757	CHESAPEAKE PUBLIC SCHOOLS	7.34
9	WTJZ	3533	CHESAPEAKE-PORTSMOUTH BROADCASTING CORPORATION	39.65
10	WPMH	68741	CHESAPEAKE-PORTSMOUTH BROADCASTING CORPORATION	73.47
11	WCPK	64003	CHRISTIAN BROADCASTING OF CHESAPEAKE, INC.	15.79
12	WGPL	69560	CHRISTIAN BROADCASTING OF NORFOLK, INC.	23.28
13	WPCE	72813	CHRISTIAN BROADCASTING OF PORTSMOUTH, INC.	17.51
14	WUSH	78447	COMMONWEALTH BROADCASTING, L.L.C.	44.71
15	WNIS	4671	COMMONWEALTH RADIO, L.L.C.	44.74
16	WPYA	73184	COMMONWEALTH RADIO, L.L.C.	20.6
17	WYCS	66672	CREATIVE EDUCATIONAL MEDIA CORP. INC.	60.29
18	WVXX	71286	DAVIDSON MEDIA STATION WVXX LICENSEE, LLC	21.83
19	WVKL	4672	ENTERCOM NORFOLK LICENSE, LLC	18.49
20	WWDE- FM	40753	ENTERCOM NORFOLK LICENSE, LLC	19.56
21	WPTE	64004	ENTERCOM NORFOLK LICENSE, LLC	16.54
22	WNVZ	40755	ENTERCOM NORFOLK LICENSE, LLC	40.67
23	WHRO- FM	25940	HAMPTON ROADS EDUCATIONAL TELECOMMUNICTNS ASSN INC	19.83
24	WHRV	25933	HAMPTON ROADS EDUCATIONAL TELECOMMUNICTNS ASSN INC	19.83
25	WHOV	25952	HAMPTON UNIVERSITY	38.17
26	WGAI	72731	MAX RADIO OF THE CAROLINAS LICENSES LLC	38.6
27	WGH	72103	MHR LICENSE LLC	42
28	WVBW	64000	MHR LICENSE LLC	22.67
29	WXMM	71287	MHR LICENSE LLC	21.83
30	WGH-FM	72102	MHR LICENSE LLC	32.45
31	WXMM	71287	MHR LICENSE LLC	21.83
32	WVBW	64000	MHR LICENSE LLC	22.67
33	WXEZ	19836	MHR LICENSE LLC	61.65
34	WNSB	49021	NORFOLK STATE UNIVERSITY BOARD OF VISITORS	11.57
35	WRJR	10759	RADIO DISNEY GROUP, LLC	18.17
36	WHKT	87170	RADIO DISNEY GROUP, LLC	15.79
37	WXTG	25917	RED ZEBRA BROADCASTING LICENSEE (NORFOLK), LLC	39.49
38	WXTG- FM	14327	RED ZEBRA BROADCASTING LICENSEE (NORFOLK), LLC	20.55
39	WTAR	60472	SINCLAIR TELECABLE, INC.	52.12
40	WJOI	67081	TIDEWATER COMMUNICATIONS, LLC	19.48
41	WAFX	67082	TIDEWATER COMMUNICATIONS, LLC	38.27
42	WNOR	67080	TIDEWATER COMMUNICATIONS, LLC	19.47
43	WJLZ	69636	VIRGINIA BEACH EDUCATIONAL BROADCASTING FOUNDATION, INC.	30.06
44	WKGM	73160	WKGM, INC.	39.49
45	WYRM	29597	WORD BROADCASTING NETWORK, INC.	33.66