

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CLEVELAND RADIO LICENSES, LLC

This statement and the attached figures were prepared on behalf of Cleveland Radio Licenses, LLP ("CRL"). CRL proposes to modify the facilities of WXVA-FM. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership or time brokerage:

Table 1: Proposed Commonly Owned or Controlled Stations Studied

Call Sign	State	City	Freq	ERP_w	Class
WXVA-FM	WV	Charles Town	98.3	6000	A
WTFX(AM)	VA	Winchester	610	500	B
WUSQ(FM)	VA	Winchester	102.5	32000	B
WMRE(AM)	VA	Winchester	1550	5000	D

Since certain of these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), an ownership study has been prepared in accordance with the Federal Communications Commission's multiple ownership rules.¹

There are no other principal community coverage contours controlled or proposed to be controlled by CTLP that overlap or intersect the principal community coverage contour of the proposed facility of WXVA-FM.

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 proposed commonly owned stations. The predicted principal community contours of all the stations studied herein (as tabulated in Table 1 above), are shown in *Figure 1*. These mutually overlapping contours form two "radio markets" for analysis under the Commission's rules.

Radio Market number 1 is defined by the mutually overlapping principal community contours of WXVA-FM, WUSQ(FM), and WMRE(AM).

¹ See 47 C.F.R. Section 73.3555.

Radio Market number 2 is defined by the mutually overlapping principal community contours of WXVA-FM, WUSQ(FM), and WTFX(AM).

Count of Stations in Defined Markets

The number of radio stations in a "radio market" is determined by counting the operating, commercial stations having principal community contours that overlap or intersect the principal community contours which define the radio market, plus the subject commonly owned or controlled stations.

In "radio market 1" as well as "radio market 2" studied herein, there are at least 6 radio stations, including the subject co-owned stations, that overlap or intersect with the defined "radio market."

Figure 2 is the tabulation of some of the radio stations identified in "radio market 1" as well as "radio market 2."

Only known licensed, operating commercial 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. Section 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. Section 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 10 degrees of azimuth.

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

Sincerely,

Troy G. Langham
FCC Engineering Specialist
Cleveland Radio Licenses, LLP

Figure 1

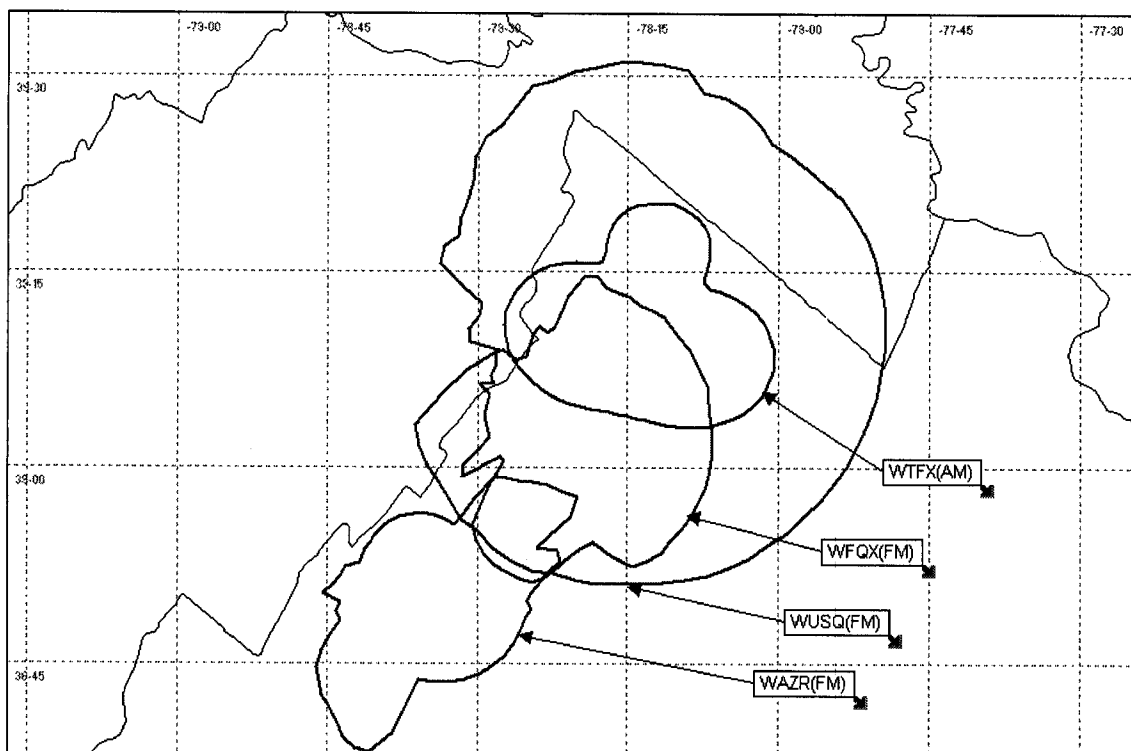


Figure 2

Count	Call Sign	City	State
1	WXVA-md	CHARLES TOWN	WV
2	WUSQ-FM	WINCHESTER	VA
3	WTFX	WINCHESTER	VA
4	WMRE	CHARLESTOWN	WV
5	WINC-FM	WINCHESTER	VA
6	WLTF	MARTINSBURG	WV
7	WWRE	BERRYVILLE	VA
8	WINC	WINCHESTER	VA
9	WRNR	MARTINSBURG	WV
10	WEPM	MARTINSBURG	WV