

Radiotechniques

402 Tenth Ave. • PO Box 367 • Haddon Heights, NJ 08035-0367

Engineering Statement

Multiple Ownership
Washington, DC Area
December 2001

Radiotechniques Engineering Corp. has been retained to determine the acceptability for common ownership of several AM broadcasting stations in the Washington DC area with respect to Federal Communications Commission Rules and Regulations §73.3555.

The attached map shows the 5.0 mV/m contours of AM Stations WKDM, Rockville, MD, WPLC, Silver Spring, MD, WZHF, Arlington, VA, WKDV, Manassas, VA, and WKCW, Warrenton, VA. These stations are proposed to be co-owned.

As can be seen, the 5.0 mV/m contour of WKCW overlaps the 5.0 mV/m contour of WKDV and no others. These stations do not effect the eligibility of ownership of WKDM.

The 5.0 mV/m contour of WPLC overlaps the 5.0 mV/m contours of WKDM and WZHF, but WKDM and WZHF do not overlap each other. The number of stations that are to be considered for multiple ownership is two, as WKDM and WPLC overlap, but WKDM does not overlap WZHF.

To meet the multiple ownership requirements of FCC Rules and Regulations for two stations with overlapping 5.0 mV/m contours, it is necessary that there be at least five stations in the market. There are many stations in this market; a study of only the AM stations in the vicinity was undertaken. An attached map shows the 5.0 mV/m contours of the stations shown. The following stations overlap WKDM, WZHF and WPLC:

- | | |
|-----------------------------|----------------------|
| WABS, Arlington, VA | WACH, Wheaton, MD |
| WCTN, Potomac, MD | WMAL, Washington, DC |
| WMET (CP), Gaithersburg, MD | WTEM, Washington, DC |
| WTNT, Bethesda, MD | WTOP, Washington, DC |
| WUST, Washington, DC | WWRC, Washington, DC |
| WWTL, Poolesville, MD | |

Several additional AM stations overlap one or both of WKDM (the station to be acquired and WPLC (the station it overlaps)

- | | |
|------------------------|-----------------------|
| WFAX, Falls Church, VA | WILC, Laurel, MD |
| WKDL, Alexandria, VA | WPGC, Morningside, MD |
| WYCB, Washington, DC | |

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There are many FM Stations that overlap the 5.0 mV/m contours of the subject stations, however this report has demonstrated that there are 16 AM stations in the market, well above the requirements for the proposed acquisition.

This is to certify that this report has been prepared by myself, and under my direction. It is correct and accurate of my own knowledge, except where stated otherwise, and where this is so, the information is correct to the best of my knowledge and belief.

I further certify that I am a Licensed Professional Engineer in the State of New Jersey, with a BSEE degree from the Newark College of Engineering of NJIT, and that I am regularly engaged in the practice of radio engineering with the firm of Radiotechniques Engineering Corporation, with offices at 402 Tenth Avenue, Haddon Heights, NJ. I am a member of the AFCCE, senior member of the IEEE, and SBE, and hold a FCC General Radiotelephone Operator License, and am Certified as a Senior Broadcast Engineer by the SBE. My qualifications are a matter of record with the FCC.

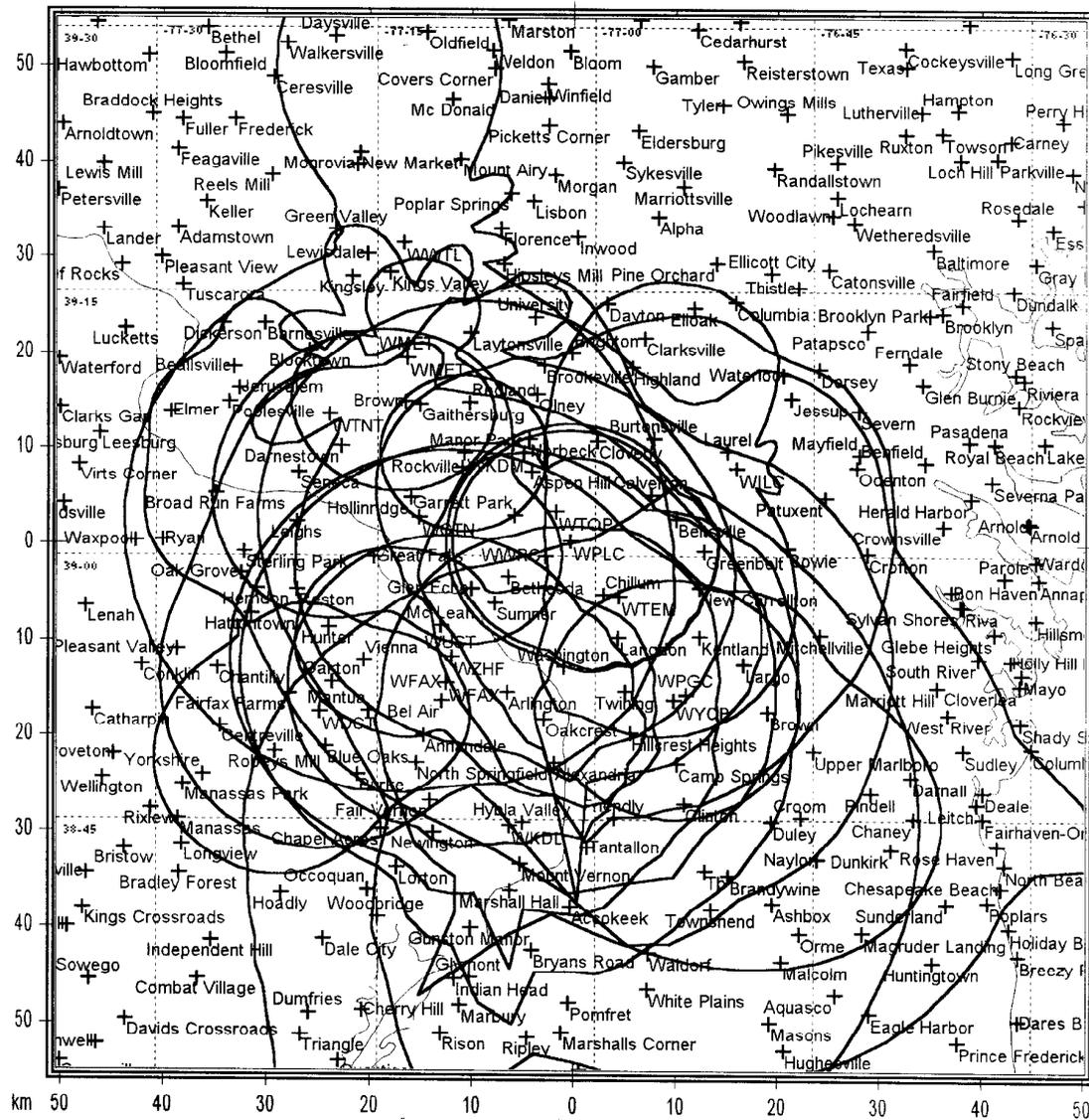


Date: December 20, 2001

Edward A. Schober, PE

Consulting Engineers

Multiple Ownership Study



5.0 mV/m Contours

State Borders Lat/Lon Grid

Map Scale: 1:694769 1 cm = 6.95 km V/H Size: 109.90 x 100.66 km