

MULTIPLE OWNERSHIP COMPLIANCE STUDY
WOUF (FM)
Beulah, Michigan
October 2014

This Multiple Ownership Compliance Study was conducted to determine if WOUF (FM) at Beulah, MI can be relocated to a new site and still be in compliance with §73.3555 of the Commission's Rules. Beulah, MI is inside the Traverse City-Petoskey, MI BIA Metro. The applicant, Roy E. Henderson has attributable interest in the following stations: WOUF (FM) at Beulah, MI, WCUZ (FM) at Bear Lake, MI, WLDR-FM at Traverse City, MI, WARD (AM) at Petoskey, MI, WBNZ (FM) at Frankfort, MI and WMTE (AM) at Manistee, MI. Because WCUZ (FM) has mutual overlap with these stations, but Bear Lake, MI is outside the BIA Metro, we are conducting this study using both the BIA Metro Method and the Commission's Interim Contour-Overlap Method.

BIA Metro Method

The applicant has attributable interest in 4 stations (3 FM and 1 AM) of the 44 stations in the Traverse City-Petoskey, MI BIA Metro. These stations are: WOUF (FM), WLDR-FM, WARD (AM) and WBNZ (FM). A copy of the latest Market Definition for the Traverse City-Petoskey, MI BIA Metro is attached. §73.3555(a)(1)(ii) states that a person or single entity (or entities under common control) may have a cognizable interest in licenses for AM or FM radio broadcast stations

In a radio market with between 30 and 44 (inclusive) full-power, commercial and noncommercial radio stations, not more than 7 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM)

Based on these findings, it is believed that the ownership of the four subject stations in this market is in compliance with §73.3555 of the Commission's Rules.

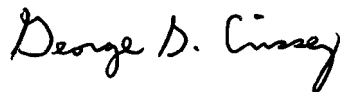
Interim Contour-Overlap Method

Exhibit #1 shows all stations in which the applicant holds attributable interest. The subject area is comprised of WOUF (FM) (Application), WCUZ (FM) (Application BMPH-20140908ACU), WBNZ (FM) and WLDR-FM, forming one radio market. These subject stations are shown in Exhibit #2. There will be no material change in the outcome of this Multiple Ownership Compliance Study if the WCUZ (FM) application is not granted. The FM services to the subject area are shown in Exhibit #3 and the AM services to the subject area are shown in Exhibit #4. Exhibit #5 is a tabulation of all services to the subject area. Exhibits #3 and 4 show 29 services including the 4 subject stations (all FM). Exhibit #5 is a tabulation of all AM and FM services to the subject area. §73.3555 (a)(1)(iii) states that a person or single entity (or entities under common control) may have a cognizable interest in licenses for AM or FM radio broadcast stations

In a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM)

Based on these findings, it is believed that the ownership of the four subject stations in this radio market is in compliance with §73.3555 of the Commission's rules.

All statements contained herein are thought to be accurate and correct to the knowledge of the undersigned.



George S. Crissey
Bromo Communications, Inc.

October 10, 2014



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FCC Geographic Market Definition for Traverse City-Petoskey, MI

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WARD	AM	750	C	Country	Traverse City-Petoskey, MI	07/02/2003	198	Henderson, Roy E	Petoskey, MI	Emmet
WBCM	FM	93.5	C	Country	Traverse City-Petoskey, MI	07/02/2003	198	Midwestern Broadcasting Company	Boyne City, MI	Charlevoix
WBNZ	FM	92.3	C	Soft Rock	Traverse City-Petoskey, MI	07/02/2003	198	Henderson, Roy E	Frankfort, MI	Benzie
WCCW	AM	1310	C	Sports	Traverse City-Petoskey, MI	07/02/2003	198	Midwestern Broadcasting Company	Traverse City, MI	Grand Traverse
WCCW	FM	107.5	C	Clsc Hits	Traverse City-Petoskey, MI	07/02/2003	198	Midwestern Broadcasting Company	Traverse City, MI	Grand Traverse
WCMW	FM	103.9	NC	Clsc/Jaz/Nws	Traverse City-Petoskey, MI	07/02/2003	198	Central Michigan University	Harbor Springs, MI	Emmet
WCZW	FM	107.9	C	Clsc Hits	Traverse City-Petoskey, MI	07/02/2003	198	Midwestern Broadcasting Company	Charlevoix, MI	Charlevoix
WFCX	FM	94.3	C	Clsc Hits	Traverse City-Petoskey, MI	07/02/2003	198	Northern Broadcast Inc	Leland, MI	Leelanau
WFDX	FM	92.5	C	Clsc Hits	Traverse City-Petoskey, MI	07/02/2003	198	Northern Broadcast Inc	Atlanta, MI	Montmorency
WGFM	FM	105.1	C	Rock	Traverse City-Petoskey, MI	07/02/2003	198	Reynolds Communications Inc (MI)	Cheboygan, MI	Cheboygan
WGFN	FM	98.1	C	Clsc Rock	Traverse City-Petoskey, MI	07/02/2003	198	Reynolds Communications Inc (MI)	Glen Arbor, MI	Leelanau
WHBP	FM	90.1	NC	News/Talk	Traverse City-Petoskey, MI	06/06/2011	198	Interlochen Center for the Arts	Harbor Springs, MI	Emmet
WIAA	FM	88.7	NC	News/Talk	Traverse City-Petoskey, MI	07/02/2003	198	Interlochen Center for the Arts	Interlochen, MI	Grand Traverse
WIAB	FM	88.5	NC	Classical	Traverse City-Petoskey, MI	01/18/2005	198	Interlochen Center for the Arts	Mackinaw City, MI	Cheboygan
WICA	FM	91.5	NC	News/Talk	Traverse City-Petoskey, MI	07/02/2003	198	Interlochen Center for the Arts	Traverse City, MI	Grand Traverse
WICV	FM	100.9	NC	Classical	Traverse City-Petoskey, MI	07/02/2003	198	Interlochen Center for the Arts	East Jordan, MI	Charlevoix
WJML	AM	1110	C	Talk	Traverse City-Petoskey, MI	07/02/2003	198	Stone Communications Inc	Petoskey, MI	Emmet
WJNL	AM	1210	C	Talk	Traverse City-Petoskey, MI	07/02/2003	198	Stone Communications Inc	Kingsley, MI	Grand Traverse
WJOG	FM	91.3	NC	CCTmp/AC	Traverse City-Petoskey, MI	05/05/2006	198	Michigan Community Radio	Good Hart, MI	Emmet
WJZQ	FM	92.9	C	Top 40	Traverse City-Petoskey, MI	07/02/2003	198	Midwestern Broadcasting Company	Cadillac, MI	Wexford
WKHQ	FM	105.9	C	Hot AC	Traverse City-Petoskey, MI	07/02/2003	198	MacDonald Garber Broadcasting	Charlevoix, MI	Charlevoix
WKLA	FM	106.3	C	AC	Traverse City-Petoskey, MI	12/12/2013	198	Synergy Media Inc	Ludington, MI	Mason
WKLT	FM	97.5	C	Rock	Traverse City-Petoskey, MI	07/02/2003	198	Northern Broadcast Inc	Kalkaska, MI	Kalkaska
WKLZ	FM	98.9	C	Rock	Traverse City-Petoskey, MI	07/02/2003	198	Northern Broadcast Inc	Petoskey, MI	Emmet
WLDR	FM	101.9	C	Country	Traverse City-Petoskey, MI	07/02/2003	198	Henderson, Roy E	Traverse City, MI	Grand Traverse
WLJN	AM	1400	NC	Relgn/Talk	Traverse City-Petoskey, MI	07/02/2003	198	Good News Media Inc	Elmwood Township, MI	Grand Traverse
WLJN	FM	89.9	NC	Relgn/Talk	Traverse City-Petoskey, MI	07/02/2003	198	Good News Media Inc	Traverse City, MI	Grand Traverse
WLJW	FM	95.9	C	Chrst/CHR	Traverse City-Petoskey, MI	02/28/2014	198	Good News Media Inc	Fife Lake, MI	Grand Traverse
WLXT	FM	96.3	C	AC	Traverse City-Petoskey, MI	07/02/2003	198	MacDonald Garber Broadcasting	Petoskey, MI	Emmet
WMBN	AM	1340	C	Sports	Traverse City-Petoskey, MI	07/02/2003	198	MacDonald Garber Broadcasting	Petoskey, MI	Emmet
WMKC	FM	102.9	C	Country	Traverse City-Petoskey, MI	07/02/2003	198	Reynolds Communications Inc (MI)	Indian River, MI	Cheboygan
WMKT	AM	1270	C	News/Talk	Traverse City-Petoskey, MI	07/02/2003	198	MacDonald Garber Broadcasting	Charlevoix, MI	Charlevoix
WNMC	FM	90.7	NC	Variety	Traverse City-Petoskey, MI	07/02/2003	198	Northwestern Michigan College	Traverse City, MI	Grand Traverse
WOUF	FM	99.3	C	Rock	Traverse City-Petoskey, MI	07/02/2003	198	Henderson, Roy E	Beulah, MI	Benzie

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

FCC Geographic Market Definition for Traverse City-Petoskey, MI

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WQEZ	FM	95.5	C	Soft AC	Traverse City-Petoskey, MI	07/02/2003	198	Reynolds Communications Inc (MI)	Glen Arbor, MI	Leelanau
WSRJ	FM	105.5	C	Sports	Traverse City-Petoskey, MI	07/02/2003	198	Northern Broadcast Inc	Honor, MI	Benzie
WSRT	FM	106.7	C	Sports	Traverse City-Petoskey, MI	07/02/2003	198	Northern Broadcast Inc	Gaylord, MI	Otsego
WTCK	FM	90.9	NC	Religion	Traverse City-Petoskey, MI	04/28/2006	198	Baraga Broadcasting Inc	Charlevoix, MI	Charlevoix
WTCM	AM	580	C	Nws/Tlk/Spt	Traverse City-Petoskey, MI	07/02/2003	198	Midwestern Broadcasting Company	Traverse City, MI	Grand Traverse
WTCM	FM	103.5	C	Country	Traverse City-Petoskey, MI	07/02/2003	198	Midwestern Broadcasting Company	Traverse City, MI	Grand Traverse
WTCY	FM	88.3	NC	Religion	Traverse City-Petoskey, MI	05/11/2011	198	Baraga Broadcasting Inc	Greilickville, MI	Leelanau
WTLI	FM	89.3	NC	ChrsContem	Traverse City-Petoskey, MI	07/02/2003	198	Smile FM	Bear Creek Township, MI	Emmet
WYPV	FM	94.5	C	Talk/News	Traverse City-Petoskey, MI	07/02/2003	198	Michigan Broadcasters LLC	Mackinaw City, MI	Cheboygan
WZTC	FM	104.5	C	80s & 90s	Traverse City-Petoskey, MI	09/03/2011	198	Playtime Media LLC	Traverse City, MI	Grand Traverse

Number of Stations in Geographic Market 44

Previous Stations in Geographic Market

WAVC	FM	93.9	C	Chrst/Talk		03/01/2007	0	West Central Michigan Media Ministries	Mio, MI	Oscoda
WLJW	AM	1370	C	Relgn/Talk		02/14/2005	0	Good News Media Inc	Cadillac, MI	Wexford
WLXV	FM	96.7	C	Hot AC		08/05/2005	0	MacDonald Garber Broadcasting	Cadillac, MI	Wexford

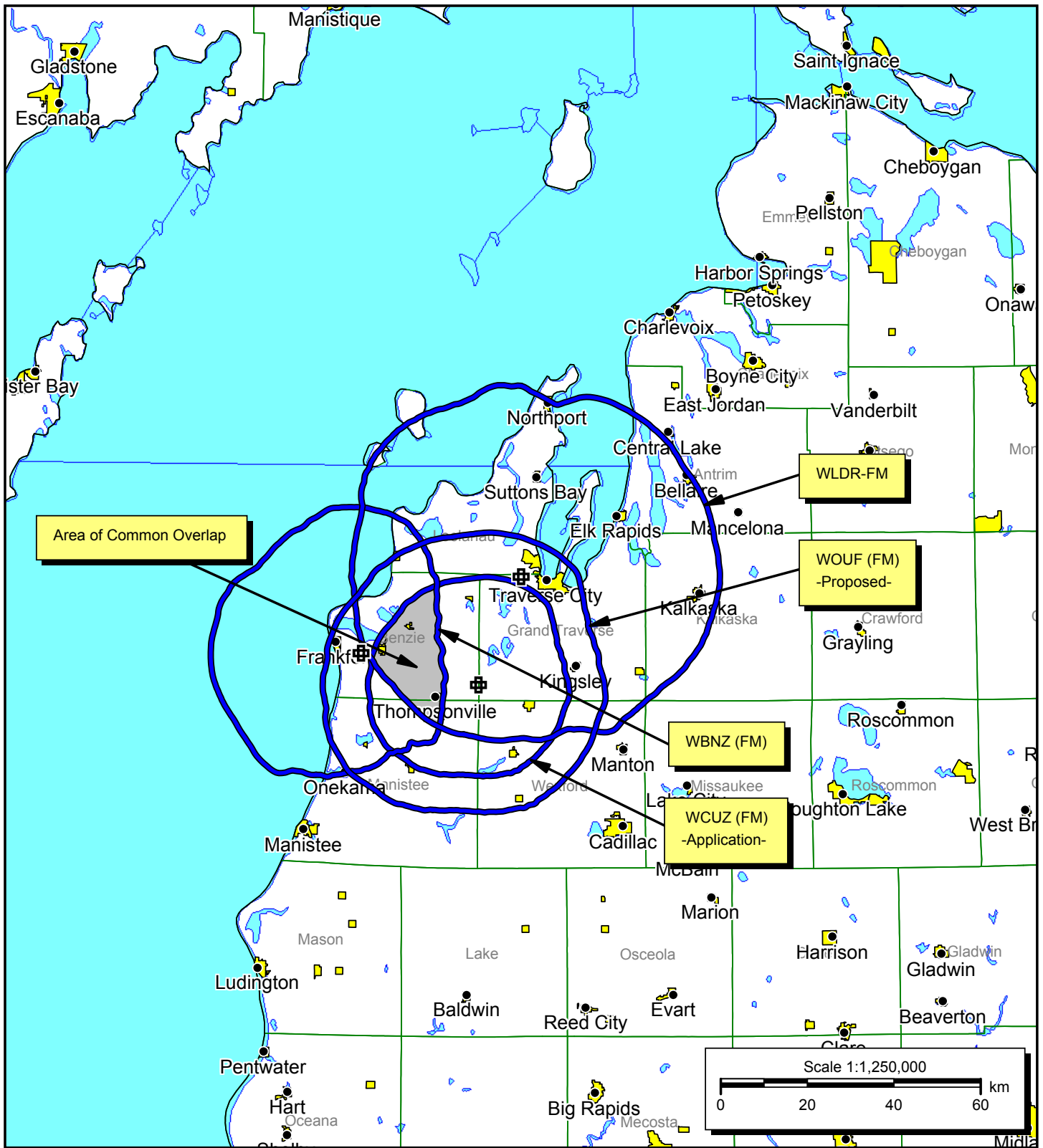


Exhibit #2
Subject Stations
Multiple Ownership Compliance Study
WOUF (FM)
Beulah, Michigan

Bromo Communications, Inc.

October 2014

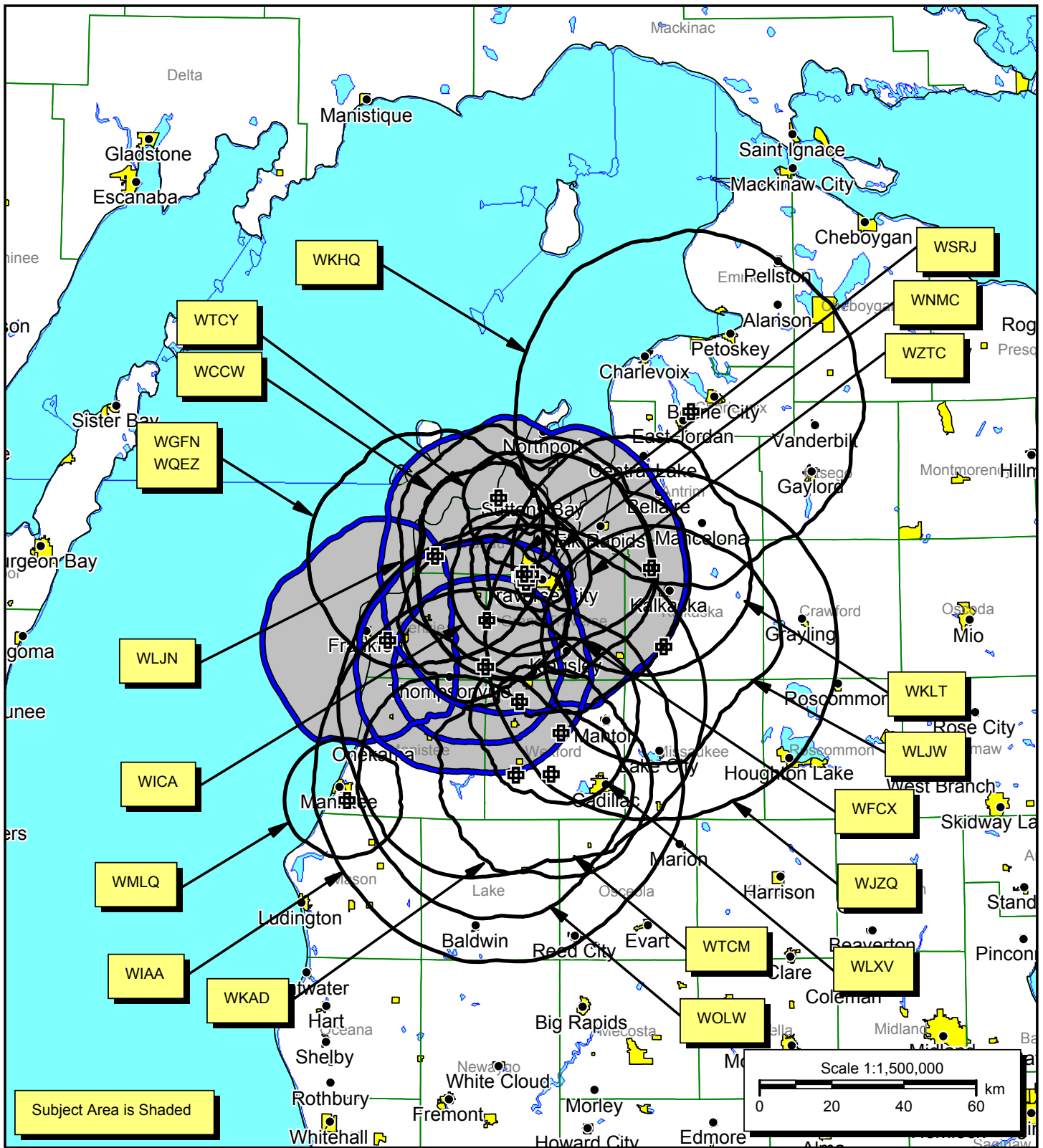


Exhibit #3
FM Services to Subject Area
Multiple Ownership Compliance Study
WOUF (FM)
Beulah, Michigan

Bromo Communications, Inc.

October 2014

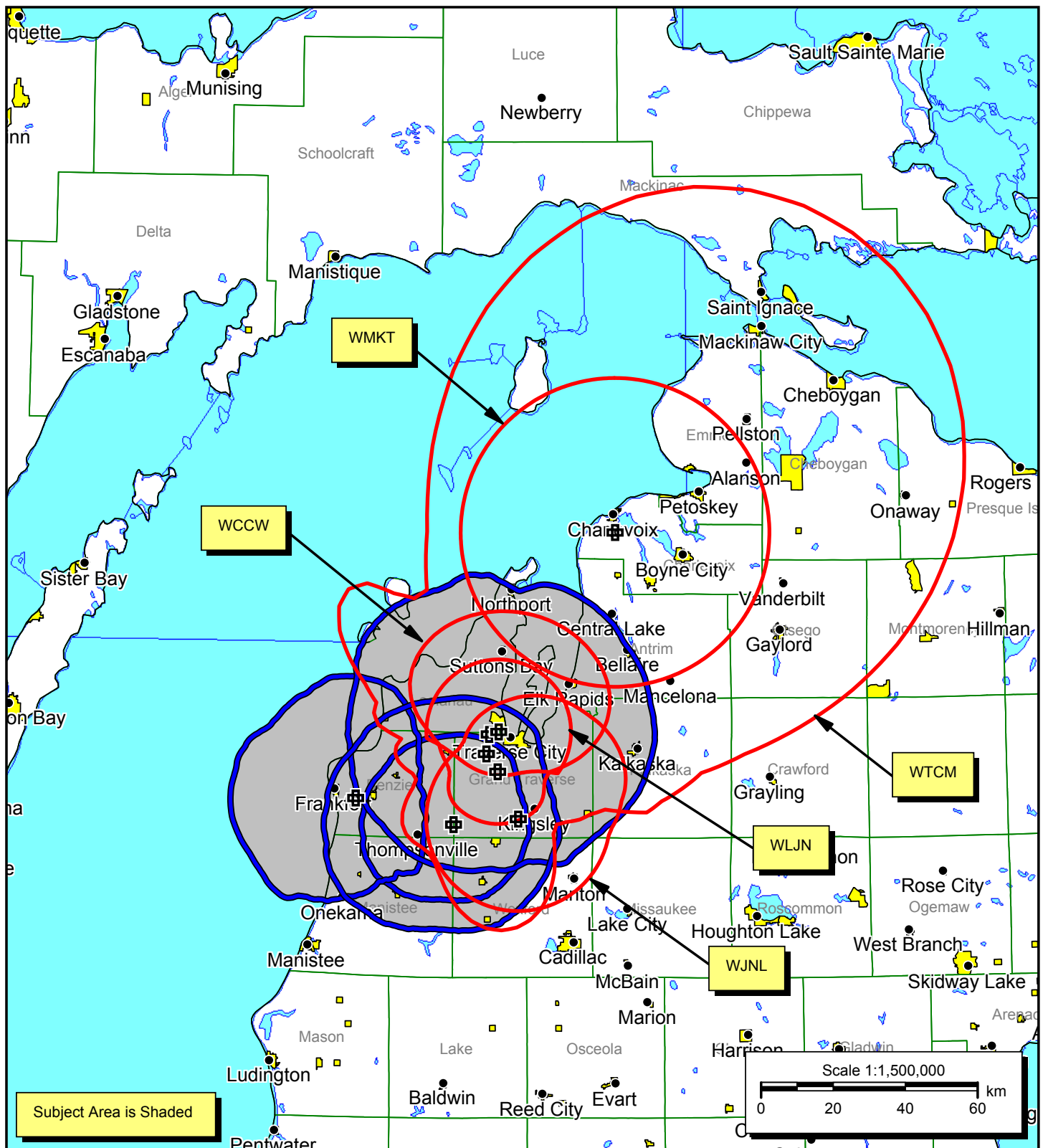


Exhibit #4
AM Services to Subject Area
Multiple Ownership Compliance Study
WOUF (FM)
Beulah, Michigan

Bromo Communications, Inc.

October 2014

EXHIBIT #5
Tabulation of Services to Subject Area
Multiple Ownership Compliance Study
WOUF (FM)
Beulah, Michigan
October 2014

Subject Stations

<u>Call</u>	<u>Ch/Freq</u>	<u>Latitude</u>	<u>Longitude</u>	<u>Power (kW)</u>	<u>City</u>	<u>State</u>
WOUF (App.)	257C2	44° 32' 44"	85° 49' 09"	32	Beulah	MI
WCUZ (App.)	264C3	44° 32' 44"	85° 49' 09"	7.3	Bear Lake	MI
WBNZ	222C2	44° 36' 38"	86° 09' 38"	50	Frankfort	MI
WLDR	270C1	44° 46' 13"	85° 41' 43"	100	Traverse City	MI

FM Services to Subject Area

<u>Call</u>	<u>Ch/Freq</u>	<u>Latitude</u>	<u>Longitude</u>	<u>Power (kW)</u>	<u>City</u>	<u>State</u>
WCCW	298C2	44° 46' 02"	85° 41' 26"	50	Traverse City	MI
WFCX	232C2	44° 46' 19"	85° 40' 58"	20.5	Leland	MI
WGFM	251C2	44° 49' 16"	85° 59' 47"	21	Glen Arbor	MI
WIAA	204C	44° 16' 33"	85° 42' 49"	100	Interlochen	MI
WICA	218C3	44° 45' 22"	85° 40' 42"	4	Traverse City	MI
WJZQ	225C1	44° 35' 41"	85° 11' 53"	100	Cadillac	MI
WKAD	229A	44° 16' 41"	85° 35' 28"	4.3	Harrietta	MI
WKHQ	290C1	45° 10' 49"	85° 05' 50"	100	Charlevoix	MI
WKLT	248C2	44° 47' 29"	85° 14' 20"	32	Kalkaska	MI
WLJN	210C1	44° 46' 36"	85° 39' 43"	100	Traverse City	MI
WLJW	240C2	44° 35' 41"	85° 11' 53"	19	Fife Lake	MI
WLXV	244C3	44° 22' 51"	85° 33' 24"	7.2	Cadillac	MI
WMLQ	249A	44° 12' 40"	86° 17' 53"	2.5	Manistee	MI
WNMC	214A	44° 46' 36"	85° 41' 02"	0.6	Traverse City	MI
WOLW	216C1	44° 16' 33"	85° 42' 49"	50	Cadillac	MI
WQEZ	238C2	44° 49' 16"	85° 59' 47"	21	Glen Arbor	MI
WSRJ	288C3	44° 39' 41"	85° 48' 53"	17	Honor	MI
WTCM	278C0	44° 27' 31"	85° 42' 02"	100	Traverse City	MI
WTCY	202C3	44° 57' 59"	85° 46' 28"	4.4	Greilicksville	MI
WZTC	283A	44° 46' 36"	85° 41' 02"	1.75	Traverse City	MI

AM Services to Subject Area

<u>Call</u>	<u>Ch/Freq</u>	<u>Latitude</u>	<u>Longitude</u>	<u>Power (kW)</u>	<u>City</u>	<u>State</u>
WCCW	1310	44° 40' 38"	85° 39' 56"	15	Traverse City	MI
WJNL	1210	44° 33' 34"	85° 35' 37"	50	Kingsley	MI
WLJN	1400	44° 46' 36"	85° 39' 43"	0.64	Elmwood Township	MI
WMKT	1270	45° 16' 22"	85° 15' 08"	27	Charlevoix	MI
WTCM	580	44° 43' 18"	85° 42' 18"	50	Traverse City	MI