

RADIO MARKET ANALYSIS
PARTNERSHIP RADIO, LLC
WUBU (FM) RADIO STATION
CH 292A - 106.3 MHZ - 2.2 kW
SOUTH BEND, INDIANA
December 2015

TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of Partnership Radio, LLC (“Partnership Radio”), the licensee of FM station WUBU, Channel 292A, South Bend, Indiana. Partnership Radio also has attributable ownership interest in FM stations WTRC-FM, Channel 237A, Niles, Michigan and WBYT, Channel 264B, Elkhart, Indiana.¹ Partnership Radio has proposed a relocation, change of operating power, and use of a directional antenna for WUBU; therefore, a review of the provisions of multiple ownership rules in §73.555 of the Commission’s rules is warranted. All three of these stations are licensed to the South Bend, Indiana BIA rated market. Therefore, this review will verify that WUBU, WTRC-FM, and WBYT are in compliance in a rated market.

2. Attached as Exhibit B is a listing of the stations in the South Bend, Indiana Market (Market Rank 183). The number of stations depicted falls in the fourteen or fewer station tier of §73.3555(a)(1)(iii) of the Commission's rules. At this level, common ownership or control of up to six stations, with no more than four in the same service in the market, is permissible.

1) Either Partnership Radio, LLC or its members also have an attributable ownership in the following stations: WBYR, Channel 255B, Woodburn, Indiana; WFWI, Channel 222A, Fort Wayne, Indiana; WAOR, Channel 274A, Ligonier, Indiana; WMEE, Channel 247B, Fort Wayne, Indiana; and WOJK-FM, channel 286B1, Hometown, Indiana and AM stations WKJG, 1380 kHz, Fort Wayne, Indiana; WOWO, 1190 kHz, Fort Wayne, Indiana; and WTRC, 1340 kHz, Elkhart, Indiana. As noted on Exhibit A, the city grade contour of the proposed WUBU overlaps with the city grade contour of only WTRC-FM and WBYT.

3. Based on the compliance shown in the rated market reviewed, the co-ownership of WUBU, WTRC-FM, and WBYT remains in compliance with the Commission's multiple ownership rules, with regard to the stations reviewed.

4. The foregoing technical statement was prepared on behalf of Partnership Radio, LLC, by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.6. BIA database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

OWNERSHIP ATTRIBUTABLE STATIONS

GRAHAM BROCK, INC.
BROADCAST TECHNICAL CONSULTANTS

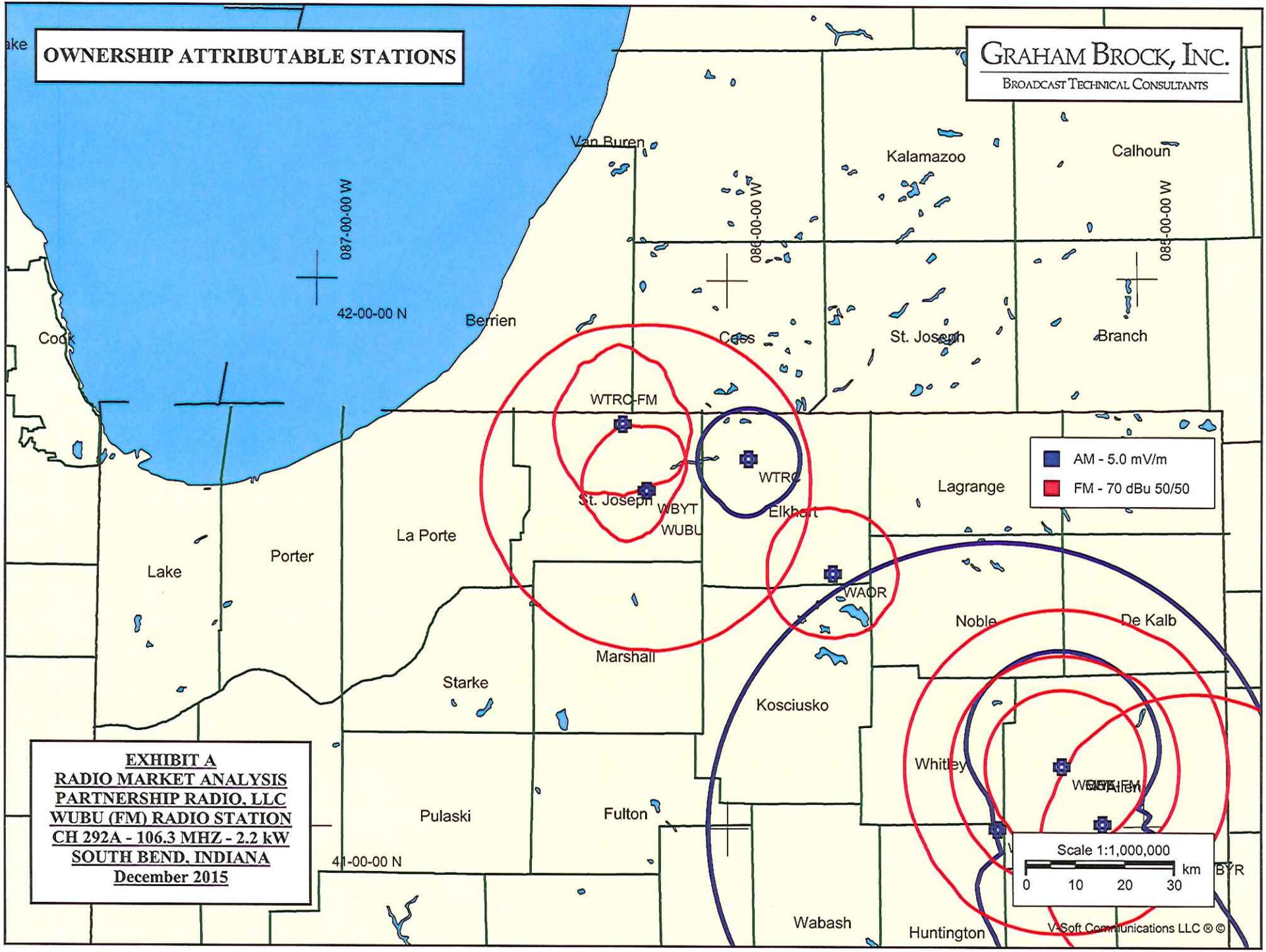


EXHIBIT A
RADIO MARKET ANALYSIS
PARTNERSHIP RADIO, LLC
WUBU (FM) RADIO STATION
CH 292A - 106.3 MHZ - 2.2 kW
SOUTH BEND, INDIANA
December 2015



FCC Geographic Market Definition for South Bend, IN

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WBYT	FM	100.7	C	Country	South Bend, IN	07/02/2003	183	Federated Media	Elkhart, IN	Elkhart
WDND	AM	1620	C	Hot AC	South Bend, IN	07/02/2003	183	Artistic Media Partners Inc	South Bend, IN	St Joseph
WETL	FM	91.7	NC	Educational	South Bend, IN	07/02/2003	183	South Bend Community School Corp	South Bend, IN	St Joseph
WFRN	FM	104.7	C	ChrsContem	South Bend, IN	07/02/2003	183	Progressive Broadcast System Inc	Elkhart, IN	Elkhart
WHFB	FM	99.9	C	Country	South Bend, IN	07/02/2003	183	Douglas Road Radio Inc	Benton Harbor, MI	Berrien
WHLY	AM	1580	NC	Mexican	South Bend, IN	07/02/2003	183	p I.B. Communications Ltd	South Bend, IN	St Joseph
WHME	FM	103.1	C	CCtmp/Talk	South Bend, IN	07/02/2003	183	LeSEA Broadcasting Corp	South Bend, IN	St Joseph
WHPZ	FM	96.9	C	ChrsContem	South Bend, IN	07/02/2003	183	LeSEA Broadcasting Corp	Bremen, IN	Marshall
WNDV	FM	92.9	C	Hot AC	South Bend, IN	07/02/2003	183	Sound Management LLC	South Bend, IN	St Joseph
WNSN	FM	101.5	C	AC	South Bend, IN	07/02/2003	183	Schurz Communications Inc	South Bend, IN	St Joseph
WRBR	FM	103.9	C	Rock	South Bend, IN	07/02/2003	183	Talking Stick Communications LLC	South Bend, IN	St Joseph
WRDI	FM	95.7	C	Religion	South Bend, IN	07/29/2003	183	Saint Joseph Catholic Radio Group LLC	Nappanee, IN	Elkhart
WSBT	AM	960	C	Nws/Tlk/Spt	South Bend, IN	07/02/2003	183	Schurz Communications Inc	South Bend, IN	St Joseph
WSMK	FM	99.1	C	Rhymc/CHR	South Bend, IN	07/02/2003	183	Williams, Marion R	Buchanan, MI	Berrien
WSMM	FM	102.3	C	70s & 80s	South Bend, IN	07/02/2003	183	Sound Management LLC	New Carlisle, IN	St Joseph
WSND	FM	88.9	NC	Clsc/Varty	South Bend, IN	07/02/2003	183	Voice of the Fighting Irish Inc	Notre Dame/South Bend,	St Joseph
WSSM	FM	97.7	C	70s & 80s	South Bend, IN	07/02/2003	183	Sound Management LLC	Goshen, IN	Elkhart
WTRC	FM	95.3	C	News/Talk	South Bend, IN	07/02/2003	183	Federated Media	Niles, MI	Berrien
WUBS	FM	89.7	NC	Religion	South Bend, IN	07/02/2003	183	Interfaith Christian Union	South Bend, IN	St Joseph
WUBU	FM	106.3	C	UrCtp/Oldes	South Bend, IN	07/02/2003	183	Partnership Radio LLC	South Bend, IN	St Joseph
WZOC	FM	94.3	C	Clsc Hits	South Bend, IN	07/02/2003	183	Douglas Road Radio Inc	Plymouth, IN	Marshall

Number of Stations in Geographic Market **21**

Previous Stations in Geographic Market

WHPD	FM	92.1	C	ChrsContem		07/22/2009	0	LeSEA Broadcasting Corp	Dowagiac, MI	Cass
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"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

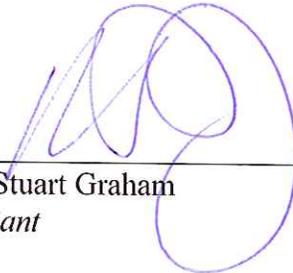
State of Georgia)
St. Simons Island) ss:
County of Glynn)

R. STUART GRAHAM, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Partnership Radio, LLC to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

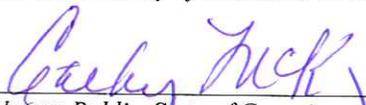
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 23rd day of December, 2015.



R. Stuart Graham
Affiant

*Sworn to and subscribed before me
this the 23rd day of December 2015*



Notary Public, State of Georgia
My Commission Expires: March 12, 2019