

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
REGENT BROADCASTING OF GRAND RAPIDS, INC.

This statement and the attached figures were prepared on behalf of Regent Broadcasting Of Grand Rapids, Inc. ("Regent"). Regent proposes the acquisition of radio station WFGR(FM). Regent, or any other entities controlled by its parent corporation, has other nearby broadcast interests. Therefore, a multiple ownership analysis was prepared considering the following radio stations under proposed common ownership or control:

Call Sign	Location	Facilities
WFGR(FM)	Grand Rapids, MI	CH 254A 2.75 kW 150 M
WNWZ(AM)	Grand Rapids, MI	1410 kHz 1 kW-D 0.05 kW-N ND-1
WLHT(FM)	Grand Rapids, MI	CH 239B 40 KW 168 M
WGRD-FM	Grand Rapids, MI	CH 250B 13 KW 180 M
WTRV(FM)	Walker, MI	CH 263A 3.5 KW 92 M

Since 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 multiple ownership rules (See Section 73.3555 of the FCC Rules).

Count of Stations in Defined Market

The number of radio stations in a "radio market" is determined by counting the operating, commercial stations having principal community contours which overlap the principal community contours which define the radio market, plus the subject stations to be co-owned. The results of the analysis are tabulated below:

Defined Radio Market	Minimum Number of Stations in Radio Market
WNWZ (AM) /WLHT (FM) /WGRD-FM/ WTRV (FM) /WFGR (FM)	10-AM/15-FM/25 Total

Figure 2 is a tabulation of the radio stations identified in the defined Radio Market. Only known operating commercial stations were employed for the study. Distances to the AM coverage contours 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 CFR 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313.

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

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Tabulation of Stations Defined in Radio Market

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
WMFN	Zeeland	MI	640
WMJH	Rockford	MI	810
WKWM	Kentwood	MI	1140
WTKG	Grand Rapids	MI	1230
WOOD	Grand Rapids	MI	1300
WBBL	Grand Rapids	MI	1340
WNWZ	Grand Rapids	MI	1410
WGVU	Kentwood	MI	1480
WYGR	Wyoming	MI	1530
WFUR	Grand Rapids	MI	1570
WZUU	Allegan	MI	92.3
WBCT	Grand Rapids	MI	93.7
WKLQ	Holland	MI	94.5
WLHT-FM	Grand Rapids	MI	95.7
WVTI	Holland	MI	96.1
WLAV-FM	Grand Rapids	MI	96.9
WGRD-FM	Grand Rapids	MI	97.9
WFGR	Grand Rapids	MI	98.7
WJQK	Zeeland	MI	99.3
WTRV	Walker	MI	100.5
WBFX	Grand Rapids	MI	101.3
WFUR-FM	Grand Rapids	MI	102.9
WVGR	Grand Rapids	MI	104.1
WOOD-FM	Grand Rapids	MI	105.7
WODJ	Greenville	MI	107.3