

Technical Report
In Support of a
47 C.F.R. Section 73.3555
Based
Interim Contour Method
Multiple Ownership Study
for

McKibbin Media Group, Inc.

For the Purchase of

*WCSR(AM) - Hillsdale, MI
WCSR-FM - Hillsdale, MI*

EXPLANATION OF REPORT: This abbreviated Technical Report has been prepared to determine ownership compliance with the purchase of WCSR(AM) - Hillsdale, MI and WCSR-FM - Hillsdale, MI, by the McKibbin Media Group, Inc. ("MMG"). None of the affected facilities are presently listed in, or reside within, any BIA Market; therefore, this report has been prepared solely using the Interim Contour-Overlap Methodology. As this new market is comprised of one (1) AM Station and one (1) FM station, this ownership group categorically falls within the provisions of §73.3555(a)(1)(iv) and §73.3555(a)(2), with no need for further showings.

The McKibbin Media Group, Inc. presently holds a broadcast interest in three (3) other aural stations, WIBM(AM) - Jackson, MI; WKHM(AM) - Jackson, MI; and WKHM-FM - Brooklyn, MI. However, these existing holdings will not be affected by the acquisition of WCSR(AM) and WCSR-FM. Therefore, this purchase will result in only one (1) additional unique and distinct market within this affected ownership group. This sole "Market A" is comprised of only one (1) AM station and one (1) FM station as identified below.

| <u>CALL SIGN</u> | <u>CH/FREQ</u> | <u>CITY</u> | <u>STATE</u> | <u>FILE NUMBER</u> |
|------------------|----------------|-------------|--------------|--------------------|
| WCSR (AM) | 1340 | HILLSDALE | MI | BL |
| WCSR-FM | 221A | Hillsdale | MI | BLH19910918KB |

EXPLANATION OF METHODOLOGY: The facilities and results reported herein were taken from current copies of AM and FM computer databases as prepared by the FCC and supplied by V-Soft Communications, LLC. The facilities listed above serve as the basis for the respective principal community contours studied. The accuracy of the results of this study is understood to be limited to the accuracy of these databases. The FCC databases give no indication of licensed facilities that may be inoperative, construction permit facilities that may now be operating under program test authority (but have not yet been issued a license) or facilities which may have been licensed since the last update. Therefore, some stations may have been included or excluded erroneously. However, unless otherwise indicated, all licensed facilities known to be inoperative and all known applications and construction permit facilities, have been eliminated from this study.

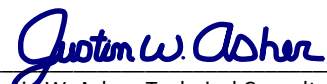
For AM stations, Map M3 soil conductivity values and the authorized licensed transmitting facilities served as the basis for the computation of the predicted 5.0 mV/m groundwave contour in accordance with 47 C.F.R. Section 73.183 of the FCC Rules. The distance to the contour was computed for seventy-two (72) equally spaced azimuths beginning with 0° True. For FM stations, the authorized Center of Radiation and ERP values were utilized to compute the predicted 3.16 mV/m (70 dBμ) contour as provided in 47 C.F.R. Section 73.313 of the Rules. The predicted FM contours shown in this report are based on seventy-two (72) equally spaced terrain radials beginning with 0° True and assume NED 03 Second Terrain data.

As stated before, there will be one (1) unique and distinct market associated with this acquisition. The market has been defined, in accordance with 47 C.F.R. Section 73.3555 of the FCC Rules, as the area within the total perimeter formed by the combined principal community contours of the market as noted above.

EXPLANATION OF RESULTS: The stations to be under common control and relevant for this ownership group, have been noted in **Exhibit 1.0**. No other MMG holdings will be affected by this new purchase of one (1) AM station and one (1) FM station. To aid in identifying the respective contours, AM contours currently owned have been showing with solid light pink lines. The AM station to be purchased has been shown with a dashed red line. FM contours currently owned have been showing with solid light blue lines. The FM station to be purchased has been shown with a dashed dark blue line. The “Market A” common overlap area has been designated as well.

Under the current rules, the market falls within the minimum limitations set forth in §73.3555(a)(1)(iv): *In a radio market with 14 or fewer full-power, commercial and noncommercial radio stations, not more than 5 commercial radio stations in total and not more than 3 commercial stations in the same service (AM or FM); provided, however, that no person or single entity (or entities under common control) may have a cognizable interest in more than 50% of the full-power, commercial and noncommercial radio stations in such market **unless the combination of stations comprises not more than one AM and one FM station**; and as further set forth in §73.3555(a)(2): *Overlap between two stations in different services is permissible if neither of those two stations overlaps a third station in the same service.* As this new market is comprised of only one (1) AM Station and one (1) FM station, this ownership group categorically falls within the provisions of §73.3555(a)(1)(iv) and §73.3555(a)(2) with no need for further showings.*

CERTIFICATION OF TECHNICAL CONSULTANT: *I declare, under penalty of perjury, that the contents of this report are true and accurate to the best of my knowledge and belief. I further certify I have over twenty years of experience as a broadcast technical consultant before the Federal Communications Commission (“the FCC”); and am familiar with the Code of Federal Regulations Title 47 (“the Rules”) as pertaining to this report and its contents herein. The underlying data utilized in this report was taken directly from FCC databases or indirectly through third party software vendors securing data directly from FCC databases. This firm cannot be held liable for errors or omissions resulting from the underlying data. The information contained herein is believed accurate to the date reported below.*



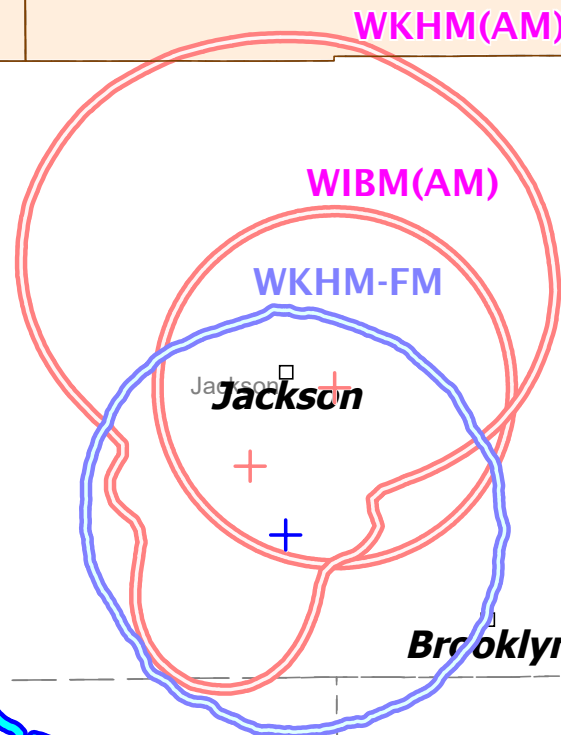
Justin W. Asher, Technical Consultant
December 18, 2019

Lansing - East Lansing BIA Market 128

Exhibit 1.0 Map of Commonly Owned Stations

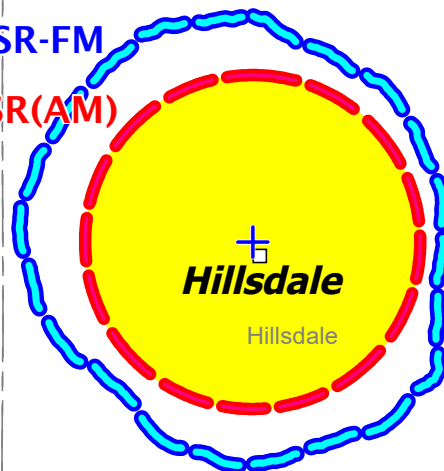
- Co-Owned AM Station(s)
- AM Station(s) to be Aquired/Modified
- Co-Owned FM Station(s)
- FM Station(s) to be Aquired/Modified
- "Market A" Common Overlap Area

Calhoun
Battle Creek, MI
BIA Market 250



Ann Arbor, MI
BIA Market 149

WCSR-FM
WCSR(AM)

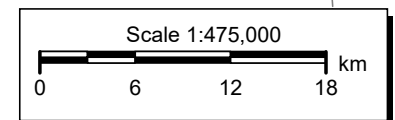


AM Contours: Daytime 5.0 mV/m
Map M3 Ground Conductivity
NAD 1983 Coordinate Datum

FM Contours: 70 dBμ F(50:50)
NED 03 sec Terrain Database
NAD 1983 Coordinate Datum

"Market A" Defining Contours
WCSR(AM) - HILLSDALE, MI
WCSR-FM - HILLSDALE, MI

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Toledo BIA Market 104