

By this application, Tugart Properties, LLC ("Tugart") seeks Commission consent to modify the facilities for WNGA (FM), Clermont, Georgia. This exhibit demonstrates that the proposed modifications comply with the Commission's local radio ownership rules.

Local Radio Ownership Rule

Under Section 73.3555(a) (1) of the Commission's rules, the FCC uses a tiered approach, as described below, to determine whether a combination of commonly-owned radio stations complies with the local radio ownership limits for any particular market.

Full-Power Commercial and NonCommercial Stations in the Market	Maximum Number of Stations in Which a Single Entity May Have an Attributable Interest	Maximum Number of Stations in the Same Service
45 or More Stations	8 Radio Stations	5
Between 30 and 44 Stations	7 Radio Stations	4
Between 15 and 29 Stations	6 Radio Stations	4
14 or Fewer Stations	5 Radio Stations (provided that no entity may have an interest in more than 50% of the stations in the market)	3

Contour Methodology: For combinations that are licensed to communities outside an Arbitron market, as is the case with the WNGA Proposal, the Commission defines the market as the area where the principal community contours for the commonly-owned stations overlap. To determine the number of stations in that market, the Commission counts all stations whose principal community contours overlap that of at least one of the commonly-owned stations. The Commission, however, excludes all stations whose transmitters are greater than 92 kilometers from the mutual overlap area and any commonly owned stations that are not included already in the market (the "Contour Methodology").

The proposal to upgrade WNGA(FM) creates a total of three markets with commonly-owned stations:

Market No. 1

***WNEG(AM)-Toccoa, GA
WNGA(FM) 286C3 Proposal***

Since this is an AM/FM combo which does not require any additional analysis under the Commission's rules.

Market No. 2

***WNEG(AM)-Toccoa, GA
WRBN(FM)-Clayton, GA
WNGA(FM) 286C3 Proposal***

This market consists of a total of 20 stations. Of this total, the applicant has attributable interest in three stations; two FM stations and one AM station. Under FCC Ownership Rules, a single entity may have an attributable interest in a total of 6 radio stations with a maximum of 4 stations in the same service. Therefore, Market No.2 of this proposal is acceptable.

Market No. 3

***WRBN(FM)-Clayton, GA
WNGA(FM) 286C3 Proposal***

This market consists of a total of 22 stations. Of this total, the applicant has attributable interest in 5 stations; two FM stations and three AM stations. Under FCC Ownership Rules, a single entity may have an attributable interest in a total of 6 radio stations with a maximum of 4 stations in the same service. Therefore, Market No. 3 of this proposal is acceptable.