

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
D&E COMMUNICATIONS, INC.

This statement and the attached figures were prepared for D&E Communications, Inc. (“D&E”). D&E proposes the acquisition of WPAO(AM) and WRTK(AM). A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership or time brokerage:

Call Sign	City of License	Facilities
WPAO(AM)	Farrell, PA	1470 kHz, 1 kW, U, DAN
WRTK(AM)	Niles, OH	1540 kHz, 0.5 kW, U, DAD

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.¹ D&E has certified that it and its attributable parties have no attributable interests in any other radio stations.

Radio Markets

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. The predicted principal contours of WPAO(AM) and WRTK(AM) are shown in Figure 1 herein. There is one “radio market” for analysis under the Commission’s Rules defined by the principal community coverage contours of WPAO(AM) and WRTK(AM).

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating, commercial stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject stations to be co-owned. In Market 1, there are 27 stations (12 FM and 15 AM) that intersect or overlap the “radio market.”

Figure 2 is a tabulation of the radio stations identified in the defined radio market. Only known licensed, operation commercial stations were employed for the study. Distances to contours for AM stations were predicted using the antenna patterns as identified in the Commission’s AM database and the appropriate Ground Wave Field

¹ See Section 73.3555 of the FCC Rules.

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. Terrain data was derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials spaced ever 10 degrees of azimuth.

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

A handwritten signature in black ink, appearing to read "Robert M. Gates, Jr.", written in a cursive style.

Robert M. Gates, Jr., E.I.T
March 12, 2001
(859) 655-6541

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Tabulation of FM Stations in Defined Radio Market 1

<u>COUNT</u>	<u>STATION</u>	<u>FREQUENCY</u>	<u>CITY</u>	<u>STATE</u>
1	WBBG	106.1	NILES	OH
2	WBTJ	101.9	HUBBARD	OH
3	WEXC	107.1	GREENVILLE	PA
4	WHOT-F	101.1	YOUNGSTOWN	OH
5	WICT	95.1	GROVE CITY	PA
6	WLLF	96.7	MERCER	PA
7	WMXY	98.9	YOUNGSTOWN	OH
8	WNCD	93.3	YOUNGSTOWN	OH
9	WQXK	105.1	SALEM	OH
10	WTNX	95.9	SHARPSVILLE	PA
11	WWIZ	103.9	MERCER	PA
12	WYFM	102.9	SHARON	PA

Tabulation of AM Stations in Defined Radio Market 1

<u>COUNT</u>	<u>STATION</u>	<u>FREQUENCY</u>	<u>CITY</u>	<u>STATE</u>
1	WANR	1570	WARREN	OH
2	WASN	1330	CAMPBELL	OH
3	WBBW	1240	YOUNGSTOWN	OH
4	WBZY	1280	NEW CASTLE	PA
5	WGFT	1500	YOUNGSTOWN	OH
6	WGRP	940	GREENVILLE	PA
7	WKBN	570	YOUNGSTOWN	OH
8	WKST	1200	NEW CASTLE	PA
9	WKTU	830	CORTLAND	OH
10	WNIO	1390	YOUNGSTOWN	OH
11	WPAO	1470	FARRELL	PA
12	WPIC	790	SHARON	PA
13	WRBP	1440	WARREN	OH
14	WRTK	1540	NILES	OH
15	WSOM	600	SALEM	OH