



Multiple Ownership Study

Quorum Radio Partners of Virginia, Inc.

This consultant has been retained by Quorum Radio Partners of Virginia, Inc. (Quorum) for the purpose of preparing a multiple ownership study in association with its proposed acquisition of WXCF AM and FM Clifton Forge, VA. Quorum is the approved transferee of two other area radio stations which are WKEY (AM) and WIQO-FM in Covington City, VA¹.

So as to determine the nature of the multiple ownership market or markets that would be created as a result of the proposed acquisition the principal community contours of each of the radio stations that would be commonly controlled were plotted on a digitally generated map. That map is included in this report as Exhibit 1. So as to aid in the clarity of the map exhibit the 70 dBu FM contours are depicted in green while the 5 mV/m AM contours are shown in red. As shown in Exhibit 1, there is indeed principal community contour overlap between all of the radio stations and that overlap occurs simultaneously. The result is a single 2 AM and 2 FM radio station market.

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Ownership in this markets is permissible provided that the combination of radio stations represents 50% or less of the total number of commercial radio stations in the market².

¹ Quorum is also the approved assignee of WSLW (AM) and WKCJ (FM) in White Sulphur Springs, WV however there is no principal community contour overlap between those stations and the stations studied in this report.

² See 47 CFR 73.3555 a1(iv) which states: In a radio market with 14 or fewer commercial radio stations, a party may own, operate, or control up to 5 commercial radio stations, not more than 3 of which are in the same service (AM or FM), except that a party may not own, operate, or control more than 50 percent of the stations in such market.

Exhibit 2 of this report is another digitally generated map which shows the principal community contours of the stations which define the Quorum ownership market along with the principal community contours of an additional 4 commercial radio stations³.

As demonstrated in Exhibit 2, the proposed combination of radio stations in both markets do indeed represent 50% or less of the total number of radio stations in the markets thus the proposed ownership is permissible under the provisions of 47 CFR 73.3555.

Methodology

The principal community contours of the FM facilities were determined and plotted, with 1° resolution, by utilizing an in-house copy of the Commission's F(50,50) prediction routine and the AM contours were predicted based on the equivalent distance methods as set forth in 47 CFR 73.183 of the Rules. Conductivities for the AM contour determinations was extracted from a digital model of the M3 conductivity map. All AM information was extracted from the Commission's February 9, 2000 AM database release and all FM information was extracted for the Commission's December 31, 2002 FM database. Specific facility information for facilities utilized in this report is included in as Exhibit 3.

Certification

All information in this report and its associated exhibits is true and accurate to the best of my belief. Having had numerous matters before the Commission, my qualifications are a matter of record.

January 9, 2003

Date

R. Lee Wheeler

R. Lee Wheeler

³ The 8 commercial radio stations shown in Exhibit 2 do not necessarily represent the total number of commercial radio stations in the markets. So as to limit the clutter on the exhibit only a sufficient number of radio stations to demonstrate that the proposed ownership is permissible were plotted.