

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE:

**PROPOSED COMMON OWNERSHIP OF
WWZY(FM) - LONG BRANCH, NJ
WITH EXISTING OWNERSHIP OF
WHTG(AM/FM) - EATONTOWN, NJ**

APRIL 2, 2003

**ENGINEERING STATEMENT IN SUPPORT OF
COMPLIANCE WITH
RADIO DUOPOLY RULES**

Prepared On Behalf Of

Press Communications, LLC

ENGINEERING EXHIBIT EE:

**PROPOSED COMMON OWNERSHIP OF
WWZY(FM) - LONG BRANCH, NJ
WITH EXISTING OWNERSHIP OF
WHTG(AM/FM) - EATONTOWN, NJ**

TABLE OF CONTENTS:

1. Figure 1, Map Showing Proposed N.J. - Common Ownership.
2. Figure 2, Map Showing Proposed WWZY(FM) - Common Ownership.
3. Figure 3, Map Showing Other Services to Duopoly Radio Market.
4. Appendix A, Partial List of Common & Non-Common Stations in Market.

Declaration

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested to prepare the instant engineering exhibit which demonstrates that the proposed acquisition of WWZY(FM) in addition to the other AM & FM stations controlled by Press Communications, LLC, is in compliance with the Radio Duopoly Rules.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

Executed on the 2nd day of April 2003.

ENGINEERING EXHIBIT EE:

**PROPOSED COMMON OWNERSHIP OF
WWZY(FM) - LONG BRANCH, NJ
WITH EXISTING OWNERSHIP OF
WHTG(AM/FM) - EATONTOWN, NJ**

NARRATIVE STATEMENT:

I. General:

This engineering statement has been prepared on behalf of Press Communications, LLC ("PRESS"). The purpose of this statement is to establish that the common ownership of WWZY(FM) at Long Branch, NJ, with the existing or proposed common ownership of four other stations by PRESS is in compliance with the radio duopoly rules. PRESS already has some ownership or control in the following three stations: WHTG(AM/FM) at Eatontown, NJ and WBHX(FM) at Tuckerton, NJ. In addition, PRESS has pending a request to acquire WBBO(FM) at Ocean Acres, NJ. However, as will be shown, there are two distinct & separate duopoly markets (see Figure 1 map, North & South). The proposed acquisition of WWZY(FM) only impacts the northern duopoly area which is currently made up of just WHTG(AM/FM).

PRESS is requesting to have some ownership interest in five stations consisting of four FM and one AM stations. However, as will be shown, there is no area which simultaneously receives city grade service from more than two common stations in the same service and no area simultaneously receives city grade service from more than three stations proposed to be under common control. Consequently, common ownership of these three overlapping stations is permissible per Section 73.3555 provided the radio market consists of at least six stations (including the three under common control).

From this point forward in this exhibit, only PRESS's ownership in the northern duopoly area will be discussed (WHTG(AM/FM) & WWZY(FM)).

II. Engineering Discussion:

A. Market Definition:

Section 73.3555 defines the "market" as the composite city grade coverage area of commonly owned facilities or proposals. The radio market is defined by the composite area generated by the 3.16 mV/M or the 70 dBu FM contours and by the 5.0 mV/m AM contours of all stations proposed to be under common control. PRESS is requesting to have some ownership interest in two overlapping FM and one overlapping AM stations.

B. Compliance With Radio Duopoly Rules:

The applicable section of 73.3555 permits the common ownership of these three stations provided the radio market consists of at least six stations (including the three under common control).

Appendix A is a partial list of the technical facilities authorized to each of the stations proposed to be under common ownership (listing is divided into AM and then FM stations). In addition, it also lists the technical parameters of six of the other "non-common" stations that were found to have their transmitter site within the composite area or which were located close enough to have a portion of their city grade contour serving all or part of the composite city grade area. Note while stations on the World Trade Center overlap the area they have not been included for duopoly purposes since they are currently operating under STAs.

Figure 1 is a map illustrating the composite city grade service contours for all five stations proposed to be under common ownership. Even after acquisition of WWZY(FM) there will still be **two distinct duopoly markets** (one north & one south). WWZY(FM) only involves the northern duopoly area. As can be seen, there is no area which simultaneously receives city grade service from more than two common stations in the same service and no area which simultaneously receives city grade service from more than three stations proposed to be under common ownership.

Figure 2 is an enlarged map illustrating the composite city grade service contours for all three northern stations (licenses & CPs) proposed to be under common ownership. This was done to illustrate the potential changes if the CPs held by WHTG-FM and WWZY(FM) are implemented. The pending application for modification of the WWZY(FM) CP proposes the same CP site but with a larger ERP. Consequently, it has been omitted. The duopoly analysis will be based upon the “licensed” composite area since this is the smaller of the potential areas involved.

Figure 3 is a map illustrating the composite “licensed” city grade service contours for the stations proposed to be under common ownership and the transmitter sites and/or contours of six of the other AM/FM facilities serving the area. It should be understood that this is only a partial list and it is expected that more stations are actually in the duopoly market.

The radio market consists of at least nine stations

(including the three stations proposed to be under common ownership).

* * * * *

A radio market which consists of six stations (including those under common ownership) is sufficient for compliance with the radio duopoly rules. Thus, PRESS's proposed ownership of the three stations is fully compliant with the radio duopoly rules.

C. Transmitter:

Terrain profile data for the FM facilities was extracted from NGDC 30 Second Digitized Terrain Data Base provided out of Boulder, Colorado. At least seventy-two bearings (every 5 degrees) were used to obtain the proposed coverage data. The technical information used has been obtained from the FM Engineering Data Base for the March 2003.

The predicted service contours, as shown in the attached report, were computed using a mathematical model adapted for computer use of the data shown in Figure 1 of Section 73.333. This is the Commission's computer program TV FM FS REPORT RS-76-01.

The AM 5.0 mV/m (city) contours were determined using conductivity data from the FCC's M-3 conductivity map. The distance to the contours was determined using theoretical M-3 conductivity information. The technical information used has been obtained from the AM Engineering Data Base for March 2003.

III. SUMMARY:

As shown herein, the composite area making up the Eatontown - Long Branch, NJ - Radio Market is currently **served by at least nine FM stations** (including the three stations proposed to be under common ownership).

Consequently, common ownership of these three stations is permissible since the radio market consists of **at least** six stations. As stated earlier, this duopoly market **consists at least nine** AM/FM stations (including the three stations proposed to be under common ownership).

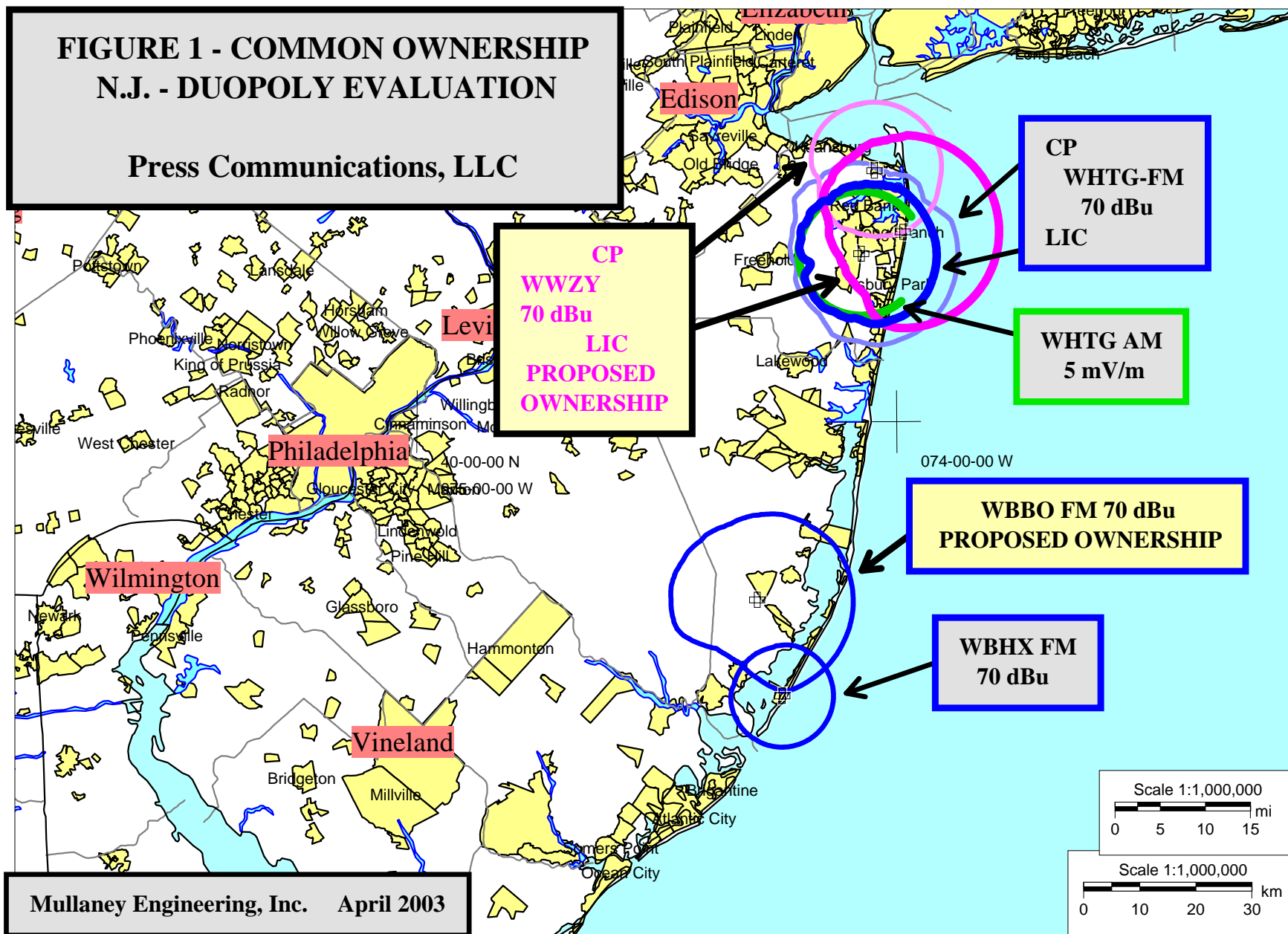
/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

April 2, 2003.

FIGURE 1 - COMMON OWNERSHIP N.J. - DUOPOLY EVALUATION

Press Communications, LLC



Mullaney Engineering, Inc. April 2003

**FIGURE 2 - COMMON OWNERSHIP
WWZY(FM) DUOPOLY EVALUATION**

Press Communications, LLC

**COMPOSITE AREA OF LICENSES
WHTG (AM/FM) & WWZY(FM)**

**WWZY
LIC 70dBu**

**WHTG-FM
LIC 70 dBu**

**WHTG AM
5 mV/m**

Mullaney Engineering, Inc. April 2003

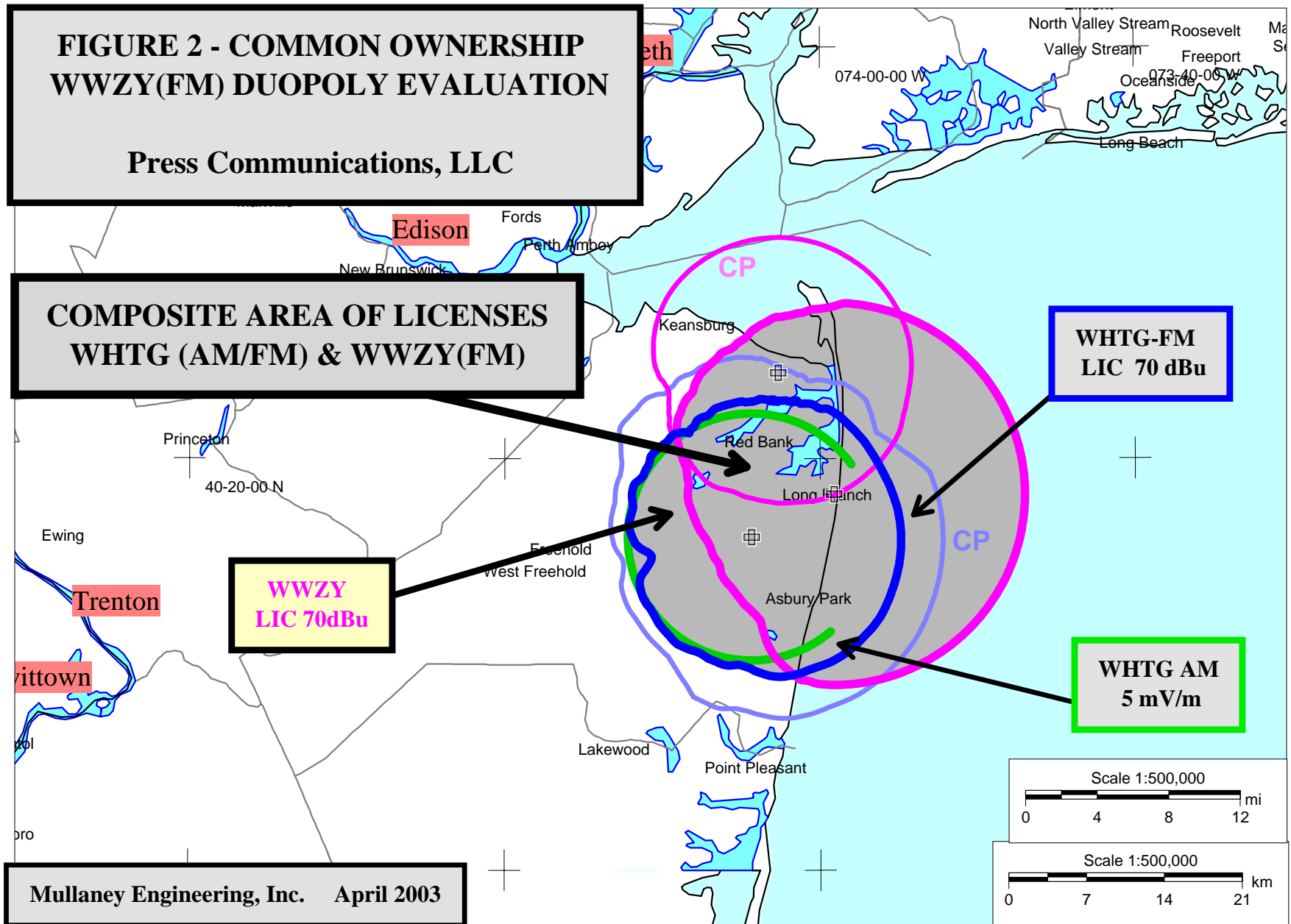
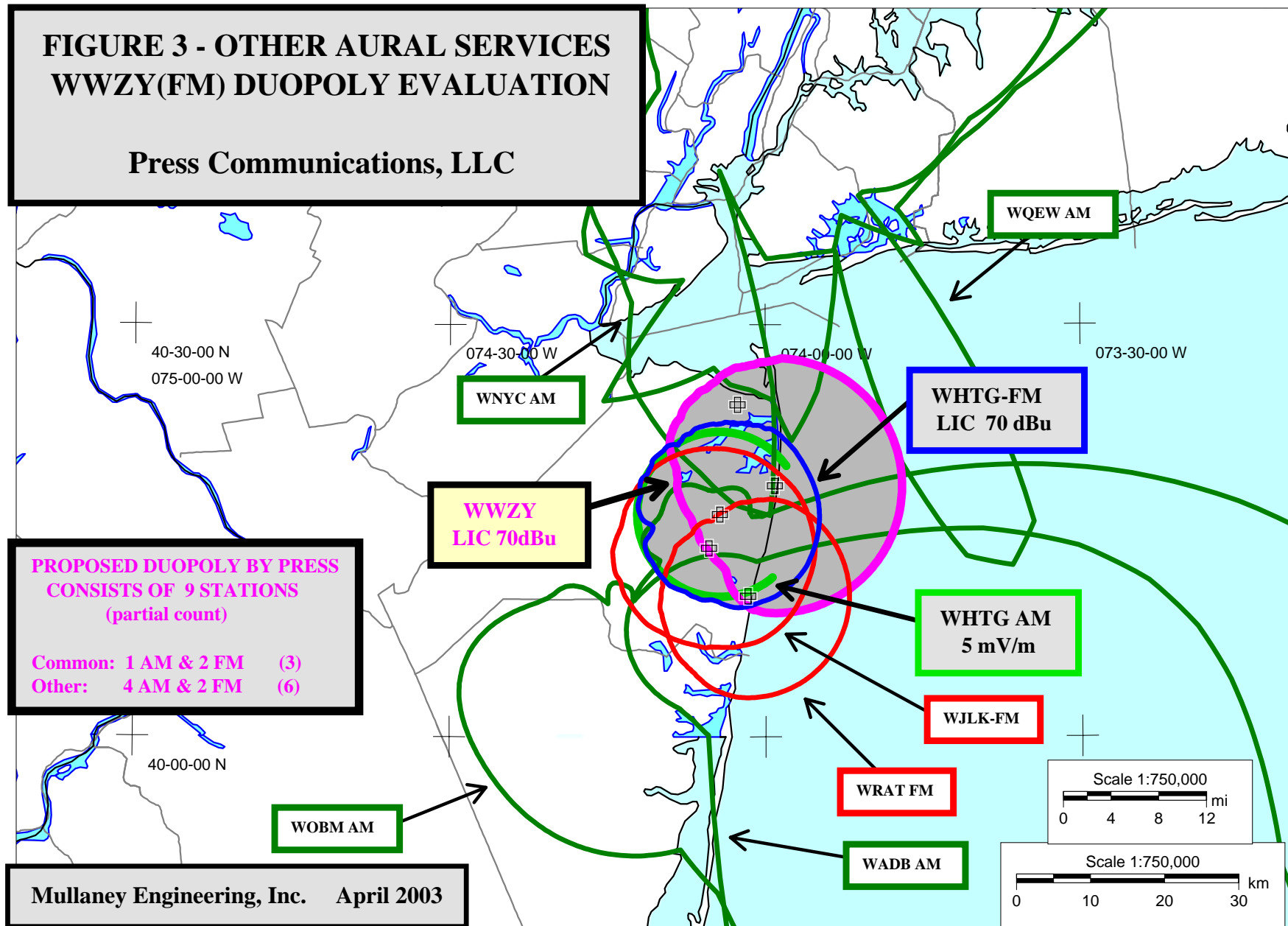


FIGURE 3 - OTHER AURAL SERVICES WWZY(FM) DUOPOLY EVALUATION

Press Communications, LLC



MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

APPENDIX A:

**PARTIAL LIST OF
COMMON & NON-COMMON
AM & FM STATIONS
SERVING COMPOSITE RADIO MARKET**

**PROPOSED COMMON OWNERSHIP OF
WWZY(FM) - LONG BRANCH, NJ
WITH EXISTING OWNERSHIP OF
WHTG(AM/FM) - EATONTOWN, NJ**

APRIL 2, 2003

Prepared On Behalf Of

Press Communications, LLC

<u>Call Sign</u>	<u>City</u>	<u>State</u>	<u>Country</u>	<u>Frequency</u>	<u>File No.</u>
<u>Status</u> <u>Hours</u>	<u>Mode</u> <u>Schedule</u>	<u>Application ID</u>		<u>Facility ID</u>	<u>Antenna System ID</u>
<u>Current Owner</u>		<u>Class</u> <u>Region 2 Class</u>		<u>Distance</u>	<u>Bearing</u>
<u>Latitude</u>	<u>Longitude</u>				
<u>Theoretical RMS</u>		<u>Last Update Date</u>			
<u>Power</u>	<u>Change List #</u>	<u>Q Factor</u>		<u>CutOff Date</u>	<u>C/A</u> <u>Fac. Status</u>
<u># of Towers</u>	<u># of Augmentations</u>	<u>Region 2 Status</u>		<u>Pattern Type</u>	<u>Fac. stat date</u>
<u>Canadian Status</u>	<u>Mexican Status</u>	<u>Itu coord status</u>		<u>App Status - Date</u>	
<u>Change List Date</u>	<u>IFRB List Flag</u>	<u>IFRB Date</u>			

AM Search Results

DB Updated: 3/31/03

WHTG	EATONTOWN NJ	US	1410 kHz		
L D	ND1 U		313706	72323	21223
			D B	0.1 km	131.1 Degrees
PRESS COMMUNICATIONS, LLC			EXISTING OWNERSHIP		
N 40° 16' 10.0"	W 74° 4' 19.0"				
315.4 mv/m 1 KM	196.0 mv/m 1 Mile				C LICEN
0.50(kW)	02239	06/21/1989		T	
1	0			GRANT	
A					
12/19/1988					
WHTG	EATONTOWN	NJ US	1410 kHz		BP20001025AAY
C D	ND2 U		532831	72323	71295
			D B	0.0 km	0.0 Degrees
PRESS COMMUNICATIONS, LLC			EXISTING OWNERSHIP CP		
N 40° 16' 12.0"	W 74° 4' 22.0"				
416.0 mv/m 1 KM	258.5 mv/m 1 Mile				C LICEN
0.28(kW)	3003			T	
1	0			GRANT	02/05/2001
02/04/2001					
WADB	ASBURY PARK	NJ US	1310 kHz	BL19890713AC	
L D	DA2 U		130810	14895	17745
			B B	4.7 km	198.9 Degrees
MILLENNIUM SHORE LICENSE HOLDCO, LLC			OVERLAPS DUOPOLY		
N 40° 13' 47.0"	W 74° 5' 27.0"				
514.1 mv/m 1 KM	319.4 mv/m 1 Mile				C LICEN
2.50(kW)	02761	11/22/1996		S	
4	0	15.80		GRANT	12/19/1989
A	U	U			
11/22/1996					

<u>Call Sign</u>	<u>City</u>	<u>State</u>	<u>Country</u>	<u>Frequency</u>	<u>File No.</u>
<u>Status</u> <u>Hours</u>	<u>Mode</u> <u>Schedule</u>	<u>Application ID</u>		<u>Facility ID</u>	<u>Antenna System ID</u>
<u>Current Owner</u>		<u>Class</u> <u>Region 2 Class</u>		<u>Distance</u>	<u>Bearing</u>
<u>Latitude</u>	<u>Longitude</u>				
<u>Theoretical RMS</u>		<u>Last Update Date</u>			
<u>Power</u>	<u>Change List #</u>	<u>Q Factor</u>		<u>CutOff Date</u>	<u>C/A</u> <u>Fac. Status</u>
<u># of Towers</u>	<u># of Augmentations</u>	<u>Region 2 Status</u>		<u>Pattern Type</u>	<u>Fac. stat date</u>
<u>Canadian Status</u>	<u>Mexican Status</u> <u>Itu coord status</u>			<u>App Status - Date</u>	
<u>Change List Date</u>	<u>IFRB List Flag</u> <u>IFRB Date</u>				

WOBM	LAKESWOOD TOWNSHIP	NJ	US	1160 kHz	BL19880725AD
L	D	DA2	U	115818	49295
		B	B	20.0 km	9782
					221.9 Degrees

NORTH SHORE BROADCASTING CORP.

N 40° 8' 9.0" W 74° 13' 48.0"

737.4 mv/m 1 KM 458.2 mv/m 1 Mile

5.00(kW) 02233

4 0

A

11/18/1988

06/02/1989

22.36

S

GRANT 11/08/1988

OVERLAPS DUOPOLY

C LICEN

WQEW	NEW YORK	NY	US	1560 kHz	BL19860331AI
L	D	DA2	U	86891	29024
		A	A	51.3 km	67729
					14.7 Degrees

THE NEW YORK TIMES ELECTRONIC MEDIA COMPANY, INC.

N 40° 43' 0.0" W 73° 55' 4.0"

2,655.4 mv/m 1 KM 1,650.0 mv/m 1 Mile

50.0(kW) 2687

2 1

A

07/20/1995

07/18/1997

A

GRANT 04/25/1986

OVERLAPS DUOPOLY

C LICEN

WNYC	NEW YORK	NY	US	820 kHz	BL19920915AB
L	D	DA2	U	176865	73357
		B	B	53.7 km	2878
					357.2 Degrees

WNYC RADIO

N 40° 45' 10.0" W 74° 6' 15.0"

1,021.0 mv/m 1 KM 634.4 mv/m 1 Mile

10.0(kW) 02739

3 0

A

08/14/1996

04/11/1997

31.60

S

GRANT 05/04/1993

OVERLAPS DUOPOLY

C LICEN

<u>Call Sign</u>	<u>Status</u>	<u>Service</u>	<u>Channel</u>	<u>Class</u>	<u>Frequency</u>	<u>Distance</u>	<u>Bearing</u>
<u>Country</u>	<u>State</u>	<u>City</u>				<u>Last Update Date</u>	
<u>Orig. Owner</u>							
<u>File No.</u>		<u>Docket</u>	<u>73_215</u>			<u>Current/Archived</u>	
<u>Latitude</u>		<u>Longitude</u>					
<u>Vertical : ERP</u>	<u>ERP Max</u>	<u>HAAT</u>	<u>AMSL</u>	<u>AGL</u>		<u>Max HAAT</u>	<u>Orientation</u>
<u>Horizontal: ERP</u>	<u>ERP Max</u>	<u>HAAT</u>	<u>AMSL</u>	<u>AGL</u>			
<u>Facility ID</u>	<u>Fac. Status - Date</u>	<u>ASRN</u>	<u>Antenna ID</u>	<u>DA</u>	<u>Make & Model</u>		
<u>Application ID</u>	<u>App Status - Date</u>						

FM Search Results

DB Updated: 3/31/03

WHTG-FM	LIC	FM	292	A	106.3 MHz	0.0 km	0.0 Degrees
US	NJ	EATONTOWN				05/08/1997	

PRESS COMMUNICATIONS, LLC

EXISTING OWNERSHIP

BMLH	19910703KC		N			C	
N 40° 16' 10.0"		W 74° 4' 19.0"					
3.90(kW)		71.0 m	91.0 m	60.0 m		88.0 m	
3.90(kW)		71.0 m	91.0 m	60.0 m			
72324	LICEN - 05/30/2000			N			
162719	GRANT - 02/18/1992						

WHTG-FM	CP MO	FM	292	A	106.3 MHz	0.1 km	311.6 Degrees
US	NJ	EATONTOWN				09/11/2002	

PRESS COMMUNICATIONS, LLC

EXISTING OWNERSHIP CP

BMPH	20010806AAA		Y			C	
N 40° 16' 12.0"		W 74° 4' 22.0"					
3.70(kW)		128.0 m	146.9 m	118.0 m		144.0 m	
3.70(kW)		128.0 m	146.9 m	118.0 m			
72324	LICEN - 05/30/2000	1219237	44417	Y		ODD FORM 301	
607721	GRANT - 01/07/2003						

WWZY	LIC	FM	296	A	107.1 MHz	8.3 km	61.8 Degrees
US	NJ	LONG BRANCH				09/08/2000	

BIG CITY RADIO-NYC, L.L.C.

PROPOSED OWNERSHIP

BLH	19980521KB		Y			C	
N 40° 18' 17.0"		W 73° 59' 8.0"					
4.70(kW)		113.0 m	126.0 m	120.0 m			
4.70(kW)		113.0 m	126.0 m	120.0 m			
32983	LICEN -	1045608	15400	Y		ODD ODD971030ID	
267297	GRANT - 03/18/1999						

WWZY	APP	FM	296	A	107.1 MHz	15.0 km	8.9 Degrees
US	NJ	LONG BRANCH				08/15/2002	

BIG CITY RADIO-NYC, L.L.C.

PROPOSED OWNERSHIP APP

BPH	20020813AAA		Y			C	
N 40° 24' 11.0"		W 74° 2' 40.0"					
1.20(kW)		165.0 m	174.0 m	120.0 m		174.0 m	
1.20(kW)		165.0 m	174.0 m	120.0 m			
32983	LICEN -	1054664		N			
607083	ACCPT - 08/15/2002						

<u>Call Sign</u>	<u>Status</u>	<u>Service</u>	<u>Channel</u>	<u>Class</u>	<u>Frequency</u>	<u>Distance</u>	<u>Bearing</u>
<u>Country</u>	<u>State</u>	<u>City</u>				<u>Last Update</u>	<u>Date</u>
<u>Orig. Owner</u>							
<u>File No.</u>		<u>Docket</u>	<u>73_215</u>			<u>Current/Archived</u>	
<u>Latitude</u>		<u>Longitude</u>					
<u>Vertical :</u>	<u>ERP</u>	<u>ERP Max</u>	<u>HAAT</u>	<u>AMSL</u>	<u>AGL</u>	<u>Max HAAT</u>	<u>Orientation</u>
<u>Horizontal:</u>	<u>ERP</u>	<u>ERP Max</u>	<u>HAAT</u>	<u>AMSL</u>	<u>AGL</u>		
<u>Facility ID</u>	<u>Fac. Status - Date</u>	<u>ASRN</u>	<u>Antenna ID</u>	<u>DA</u>	<u>Make & Model</u>		
<u>Application ID</u>	<u>App Status - Date</u>						

WWZY	CP	FM	296	A	107.1 MHz	15.0 km	8.9 Degrees
US	NJ	LONG BRANCH				02/28/2001	

BIG CITY RADIO-NYC, L.L.C.

PROPOSED OWNERSHIP CP

BPH	20000614ACI		Y			C	
N 40° 24' 11.0"		W 74° 2' 40.0"					
0.63(kW)		165.0 m	174.0 m	120.0 m	174.0 m		0
0.63(kW)		165.0 m	174.0 m	120.0 m			
32983	LICEN -	1054664		N			
552039	GRANT - 02/28/2001						

WJLK-FM	LIC	FM	232	A	94.3 MHz	4.7 km	198.9 Degrees
US	NJ	ASBURY PARK				05/12/1997	

MILLENNIUM SHORE LICENSE HOLDCO, LLC

OVERLAPS DUOPOLY

BLH	19881201KB		N			C	
N 40° 13' 45.0"		W 74° 5' 24.0"					
1.30(kW)		152.0 m	171.0 m	136.0 m	169.0 m		
1.30(kW)		152.0 m	171.0 m	136.0 m			
14907	LICEN -			N			
121148	GRANT - 01/08/1990						

WRAT	LIC	FM	240	A	95.9 MHz	11.6 km	161.3 Degrees
US	NJ	POINT PLEASANT				08/18/2000	

THE SENTINEL PUBLISHING CO.

OVERLAPS DUOPOLY

BLH	19990114KD		N			C	
N 40° 10' 15.0"		W 74° 1' 42.0"					
4.00(kW)		73.0 m	90.0 m	85.0 m	90.0 m		
4.00(kW)		73.0 m	90.0 m	85.0 m			
59530	LICEN - 02/15/2001	1059624		N			
512529	GRANT - 02/15/2001						

WPAT-FM	LIC	FM	226	B	93.1 MHz	49.4 km	5.7 Degrees
US	NJ	PATERSON				08/20/1997	

WPAT LICENSING, INC.

World Trade Center

BLH	19820223AR		N			C	
N 40° 42' 43.0"		W 74° 0' 49.0"					
5.40(kW)		433.0 m	443.0 m	439.0 m	443.0 m		
5.40(kW)		433.0 m	443.0 m	439.0 m			
51663	LICEN -			N			
39605	GRANT - 03/02/1983						

<u>Call Sign</u>	<u>Status</u>	<u>Service</u>	<u>Channel</u>	<u>Class</u>	<u>Frequency</u>	<u>Distance</u>	<u>Bearing</u>
<u>Country</u>	<u>State</u>	<u>City</u>				<u>Last Update Date</u>	
<u>Orig. Owner</u>							
<u>File No.</u>		<u>Docket</u>	<u>73_215</u>			<u>Current/Archived</u>	
<u>Latitude</u>		<u>Longitude</u>					
<u>Vertical : ERP</u>	<u>ERP Max</u>	<u>HAAT</u>	<u>AMSL</u>	<u>AGL</u>		<u>Max HAAT</u>	<u>Orientation</u>
<u>Horizontal: ERP</u>	<u>ERP Max</u>	<u>HAAT</u>	<u>AMSL</u>	<u>AGL</u>			
<u>Facility ID</u>	<u>Fac. Status - Date</u>	<u>ASRN</u>	<u>Antenna ID</u>	<u>DA</u>	<u>Make & Model</u>		
<u>Application ID</u>	<u>App Status - Date</u>						

WKTU	LIC	FM	278	B	103.5 MHz	49.4 km	5.7 Degrees
US	NY	LAKE SUCCESS				01/05/1998	
AMFM RADIO LICENSES, LLC							
BLH	19901228KE			N		C	
N 40° 42' 43.0"		W 74° 0' 49.0"					
5.40(kW)		432.0 m	443.0 m	440.0 m	443.0 m		
5.40(kW)		432.0 m	443.0 m	440.0 m			
6595	LICEN - 06/20/2000			N			
155866	GRANT - 04/26/1991						

WNYC-FM	LIC	FM	230	B	93.9 MHz	49.4 km	5.7 Degrees
US	NY	NEW YORK				08/18/1997	
WNYC RADIO						World Trade Center	
BLH	19860120KB			N		C	
N 40° 42' 43.0"		W 74° 0' 49.0"					
5.40(kW)		432.0 m	443.0 m	440.0 m	443.0 m		
5.40(kW)		432.0 m	443.0 m	440.0 m			
73355	LICEN -			N			
299092	GRANT -						

WAXQ	LIC	FM	282	B	104.3 MHz	53.7 km	7.7 Degrees
US	NY	NEW YORK				07/22/1996	
WAXQ LICENSE CORP						World Trade Center	
BLH	19960426KA			N		C	
N 40° 44' 54.0"		W 73° 59' 10.0"					
6.00(kW)		415.0 m	429.0 m	413.0 m	429.0 m		
6.00(kW)		415.0 m	429.0 m	413.0 m			
23004	LICEN - 02/25/2002			N			
224050	GRANT - 07/19/1996						