

### **MULTIPLE OWNERSHIP SHOWING**

Beasley Media Group Licenses, LLC (“Beasley”) hereby demonstrates that grant of the instant application will be fully consistent with the Commission’s local radio multiple ownership rule. By this application, Beasley proposes to add a new auxiliary antenna location for WDMK(FM), Detroit, Michigan, Facility ID 4597, at the transmitter site of WCSX(FM), Birmingham, Michigan, which is also owned by Beasley. Grant of the application, which is for an auxiliary antenna, will not create new or increased concentration of ownership among commonly owned, operated or controlled media properties. WDMK is included in the Detroit Nielsen Audio market (“Detroit Metro”).

The Commission’s local radio multiple ownership rule provides that in markets with 45 or more full-power, commercial and noncommercial radio stations, one party may have a cognizable interest in licenses for not more than eight commercial radio stations, no more than five of which are in the same service (AM or FM). 47 C.F.R. § 73.3555(a)(1)(i). The Commission defines the relevant market to be the “Arbitron Metro” (now known as “Nielsen Audio Metro”), in those markets so designated by Nielsen Audio. *See 2002 Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, 18 FCC Rcd 13620, 13712-13 (2003).

For purposes of the local radio ownership rule, WDMK is deemed to be part of the Detroit Metro. According to BIA Advisory Service, LLC's *Media Access Pro* database as of September 4, 2019 (*see* the attached *FCC Geographic Market Definition Report for the Detroit Metro*), there are 74 full-power, commercial and noncommercial radio stations licensed to communities within the Detroit Metro or which Nielsen Audio designates as "home" to the Detroit Metro.

As shown in the attached exhibit, Beasley controls four commercial radio stations (4 FM stations and 0 AM stations) in the Detroit Metro and will continue to have a cognizable interest in four FM commercial radio stations upon a grant of the instant application. Because this application does not create any new or increased concentration of ownership among commonly owned, operated or controlled media properties, Beasley's control of such stations in the Detroit Metro remains fully compliant with the local radio ownership rule.

For the reasons set forth herein, a grant of this application is fully consistent with the local radio ownership rule.