

MULTIPLE SERVICES STUDY

Associated with the
Co-ownership of Stations:

WBUC(AM) – Buckhannon, WV
WCLG-FM – Morgantown, WV
WCLG(AM) – Morgantown, WV
WSWW-FM – Fairmont, WV
WBTQ-FM – Weston, WV
WFGM-FM – Barrackville, WV
WPDx-FM – Clarksburg, WV
WPDx(AM) – Clarksburg, WV

Interim Contour Methodology

November 2019

CERTIFICATION OF ENGINEERS

The firm of Munn-Reese, Broadcast Engineering Consultants, with offices at 385 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data forming this report.

The data utilized in this report was taken from the FCC Secondary Database and data on file. While this information is believed accurate, errors or omissions in the database and file data are possible. This firm may not be held liable for damages as a result of such data errors or omissions.

The report has been prepared by properly trained electronics specialists under the direction of the undersigned whose qualifications are a matter of record before the Federal Communications Commission.

I declare under penalty of the laws of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

November 8, 2019

MUNN-REESE

By



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Engineering Statement

This firm was retained to determine whether the AJG Corporation's continued ownership of its current attributable broadcast interests, with the acquisition of WPDJ(AM) – Clarksburg, WV and WPDJ-FM – Clarksburg, WV, complies with the Commission's multiple ownership rule, 47 C.F.R. Section 73.3555. This report is being submitted with the applications associated with the acquisition of WPDJ(AM) and WPDJ(FM).

With this acquisition there will be a total of (8) commonly owned or controlled stations within West Virginia and specifically the Morgantown-Clarksburg-Fairmont, WV Nielsen Metro Market as reported by BIA.

Portions of these holdings are subject to analysis under either the *Interim Contour-overlap Methodology* or the *BIA Market Methodology*. This study solely addresses the *Interim Contour-overlap Methodology* portion of these holdings. Individual *BIA Market Methodology* studies for the affected BIA Market facilities have been supplied separately.

Three (3) of these facilities, WFGM-FM, WCLG-FM and WCLG(AM) are listed as "Home" to the Morgantown-Clarksburg-Fairmont, WV Nielsen Metro Market and do not overlap any *Interim Contour-overlap Methodology* affected stations. Therefore, analysis of the market defined by these stations may be addressed solely under the *BIA Market Methodology* which will be addressed separately in this application. These (3) stations define Market #1.

Two (2) of these facilities, WPDJ-FM and WPDJ(AM) are listed as "Home" to the Morgantown-Clarksburg-Fairmont, WV Nielsen Metro Market. This station does overlap select *Interim Contour-overlap Methodology* affected facilities therefore studies under both the *Interim Contour-overlap Methodology* (supplied here-in) and the *BIA Market* are included. These stations define Market #2.

Three (3) of these facilities WFGM-FM, WCLG(AM), and WPDJ-FM are listed as "Home" to the Morgantown-Clarksburg-Fairmont, WV Nielsen Metro Market. Therefore, analysis of the market defined by these stations may be addressed solely under the *BIA Market Methodology* which will be addressed separately in this application. These (3) stations define Market #3.

Three (3) of these facilities, WFGM-FM, WPDJ(AM) and WPDJ-FM are listed as "Home" to the Morgantown-Clarksburg-Fairmont, WV Nielsen Metro Market and do not overlap any *Interim Contour-overlap Methodology* affected stations. Therefore, analysis of the market defined by these stations may be addressed solely under the *BIA Market Methodology* which will be addressed separately in this application. These (3) stations define Market #4.

Under the *Interim Contour-overlap Methodology*, one (1) separate and distinct market will result within this entire ownership group. "Market 2" is comprised of WBUC(AM) – Buckhannon, WV, WPDJ-FM – Clarksburg, WV, WPDJ(AM) – Clarksburg, WV and WBTQ-FM – Weston, WV.

The existing facilities of the stations included in this report were determined by the use of currently updated copies of the FCC computer databases of AM and FM stations. The listed facilities served as the basis for the computation of the respective principal community contours. The accuracy of the results of this study is understood to be limited to the accuracy of these databases. The FCC databases give no indication of licensed facilities that may be inoperative, construction permit facilities that may now be operating under program test authority (but have not yet been issued a license) or facilities which may have been licensed since the last update. Therefore, some stations may have been included or excluded erroneously. However, unless otherwise indicated, all licensed facilities known to be inoperative and all known applications and construction permit facilities, have been eliminated from consideration in this study.

For AM stations, Map M-3 soil conductivity values and the authorized licensed transmitting facilities served as the basis for the computation of the predicted 5.0 mV/m groundwave contour in accordance with §73.183 of the FCC Rules. The distance to the contour was computed for seventy-two (72) equally spaced azimuths beginning with 0° True. For FM stations, the authorized Center of Radiation and ERP values were utilized to compute the predicted 3.16 mV/m (70 dBu) contour as provided in §73.313 of the Rules. The predicted FM contours shown in this report are based on the use of 72 equally spaced terrain radials beginning with 0° True.

Engineering Statement (continued)

As stated before, there is only one (1) unique and distinct market associated with this filing that requires the *Interim Contour-overlap Methodology*. The market has been defined, in accordance with §73.3555 of the FCC Rules, as the area within the total perimeter formed by the combined principal community contours of WBUC(AM), WPDX-FM, WPDX(AM) and WBTQ(FM) as designated Market #2.

Exhibit 1.0 shows the eight (8) stations under common control or proposed to be under common control which are relevant for this ownership group. The “Market 1”, Market 2”, “Market 3” and “Market 4” common overlap areas have been designated as well.

For “Market 2”, the market defining contours have been shown in **Exhibit 2.0** of this report along with enough additional principal community contours entering the market. The defining contours have been shown with purple dashed lines on this map. AM contours entering the market have been denoted in green lines. FM contour entering the market have been shown in red lines. Co-owned stations entering the market, but not defining the market have been omitted. **Exhibit 2.1** a tabulation of the stations.

Under the current rules, “Market 2” falls at least within the minimum limitations set forth in §73.3555 (a)(1)(iv): ***In a radio market with 14 or fewer full-power, commercial and noncommercial radio stations, not more than 5 commercial radio stations in total or not more than 3 commercial stations in the same service (AM or FM); provided however, that no person or single entity (or entities under common control) may have a cognizable interest in more than 50% of the full-power, commercial and noncommercial stations in such market unless the combination of stations comprises not more than one AM and one FM station.*** The principal community contours of at least four (4) other stations entering the Market 2 are shown in **Exhibit 2.0**. Including the (2) FM and 2 (AM) stations which define the market, there are at least eight (8) aural services in “Market 2”, giving less than a 50% interest in the market. **Exhibit 2.1** lists the facilities of the individual stations used in this “Market 2” report.

Exhibit 1.0 - Map Showing All Commonly Owned Stations

Munn-Reese.com

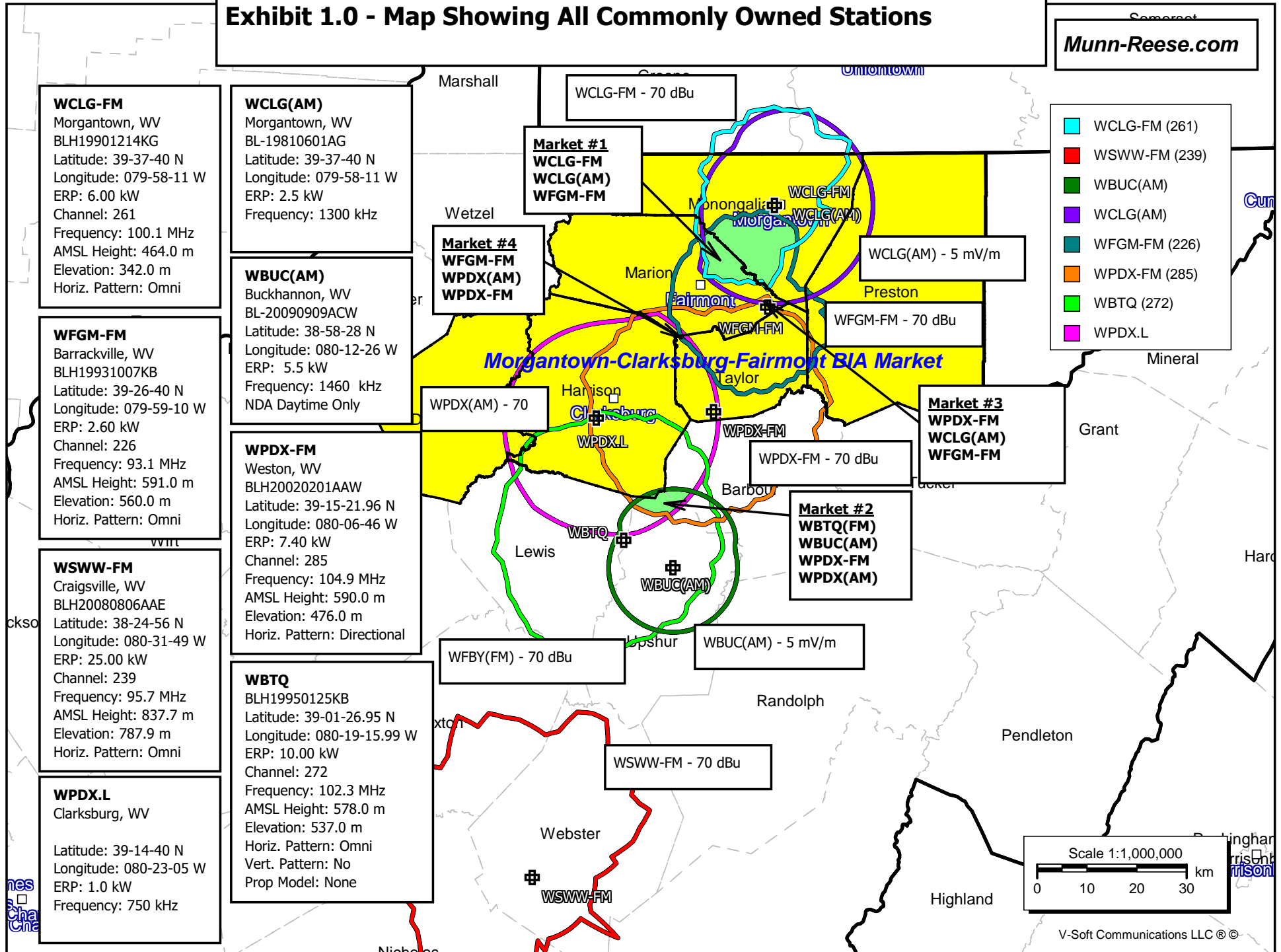


Exhibit 2.0 - Stations Entering Market #2

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- REF
- WKJL (201)
- WVPW (205)
- WYXA (211)
- WBHZ (220)
- WVWC (221)
- WGIE (224)
- WFBY (228)
- WRLF (232)
- WELK (234)
- WOTR (242)
- WDBS (246)
- WKKW (250)
- WDNE-FM (255)
- WAFD (262)
- WZST (265)
- WBRB (267)
- WVAQ (270)
- WGYE (274)
- WAJR-FM (277)
- WVIW (281)
- WHTI (289)
- WWLW (293)
- WCLG
- WMMN
- WXKX
- WVUS
- WHAW

Color Legend

- FM stations Entering Market #2
- AM stations Entering Market #2

Interim contour Market #2

- WBUC(AM)
- WPDX-FM
- WPDX(AM)
- WBTQ(FM)

AM contours: 5.0 mV/m Daytime
Map M3 Ground Conductivity
FM Contours: 70 dBu F(50:50)

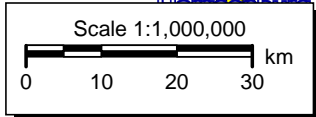


Exhibit 2.1

Tabulation of Select Stations Entering "Market 2"

Stations Entering Market 2: (No Less than 8)

Total number of overlapping contours: 31

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WPDX	AM	750	CLARKSBURG	WV	BL	0.0	0.0
WBUC	AM	1460	BUCKHANNON	WV	BL20090909ACW	33.7	152.8
WBTQ	FM	272B1	Weston	WV	BLH19950125KB	25.1	167.3
WPDX-FM	FM	285B1	Clarksburg	WV	BLH20020201AAW	23.5	86.8

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
WKJL	FM	201B	Clarksburg	WV	BLD20090910AAV	10.1	52.6
WVPW	FM	205B	Buckhannon	WV	BLD20031212ABB	28.0	213.5
WYXA	FM	211B1	Clarksburg	WV	BLD20090603AGE	8.3	355.7
WBHZ	FM	220A	Elkins	WV	BLD19990107KB	57.3	136.1
WVWC	FM	221D	Buckhannon	WV	BLD19810908AF	31.7	153.1
WGIE	FM	224A	Clarksburg	WV	BLH7595	7.9	49.2
WFBY	FM	228B1	Buckhannon	WV	BLH19960402KC	43.1	134.9
WRLF	FM	232A	Fairmont	WV	BLH19940207KD	32.9	39.7
WELK	FM	234B1	Elkins	WV	BLH19910809KD	63.4	125.4
WOTR	FM	242A	Weston	WV	BLH20091125ADV	22.6	211.4
WDBS	FM	246B	Sutton	WV	BLH20160726AAI	88.1	183.9
WKKW	FM	250B	Fairmont	WV	BLH19930902KB	33.8	55.2
WDNE-FM	FM	255B1	Elkins	WV	BLH19980401KE	63.6	125.5
WAFD	FM	262B	Webster Springs	WV	BLH20160726AAK	88.1	183.9
WZST	FM	265A	Westover	WV	BLH19830117AQ	51.3	49.2
WBRB	FM	267B	Buckhannon	WV	BLH19900125KA	37.7	151.9
WVAQ	FM	270B	Morgantown	WV	BLH19810417AI	53.1	40.3
WGYE	FM	274A	Mannington	WV	BLH19931216KD	29.2	31.9
WAJR-FM	FM	277A	Salem	WV	BLH20000623AFG	7.4	285.6
WVIW	FM	281A	Bridgeport	WV	BMLD20170706AAV	10.1	52.6
WHTI	FM	289A	Salem	WV	BLH19900925KE	9.4	330.6
WWLW	FM	293B	Clarksburg	WV	BLH20020226AAR	7.4	285.6
WCLG	AM	1300	MORGANTOWN	WV	BL19810601AG	55.6	39.9
WMMN	AM	920	FAIRMONT	WV	BL19940614AB	29.2	31.9
WXXK	AM	1340	CLARKSBURG	WV	BL19790109AC	7.9	49.2
WVUS	AM	1190	GRAFTON	WV	BML20151116ATD	31.7	68.1
WHAW	AM	980	LOST CREEK	WV	BL20190430ABK	23.5	194.9

Distance and bearing calculations from coordinates: 39-14-40 N, 080-23-05 W

Duopoly Options:

TV: Not Included

FM: 3.16 mV/m (70 dBu); Include NCE

AM: 5.0 mV/m