

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	Facility ID No. 147273
)	
W266BW, Winder, Georgia)	Application File No. 0000186272
)	

To: Chief, Audio Division

RESPONSE

Davis Broadcasting of Atlanta, L.L.C. (“Davis”), by its attorneys, responds to the Commission’s letter dated May 11, 2023 (the “Letter”) regarding a complaint (the “Complaint”) by Tri-State Communications, Inc. (“Tri-State”) alleging interference by translator station W266BW, Winder, Georgia to WLJA-FM, Ellijay, Georgia.¹ The Complaint is not a valid and complete interference claim package and should be dismissed.

I. THE COMPLAINT DOES NOT COMPLY WITH THE INTERFERENCE CLAIM PACKAGE RULES.

A. Rule-Compliant U/D Data Was Not Submitted.

Full power stations complaining of alleged translator interference must comply with specific requirements. The Commission enumerated these in the *Translator Interference Order*.² Among them, “a station submitting a translator interference claim package . . . must include . . . U/D data demonstrating that at each listener location the ratio of undesired to desired signal

¹ Letter of James D. Bradshaw, Senior Deputy Chief, Audio Division, Media Bureau, to Davis Broadcasting of Atlanta, L.L.C., dated May 11, 2023.

² *Amendment of Part 74 of the Commission’s Rules Regarding FM Translator Interference*, Report and Order, 34 FCC Rcd 3457 (2019) (“*Translator Interference Order*”).

strength exceeds -20 dB for co-channel situations....”³ Tri-State did not include U/D data at each listener location. It submitted U/D data for certain locations not identified by listeners.

Listener number 4 (Kitchens) identified five locations where interference was alleged to have occurred: “Intersection of 113 & 61 to Dallas,” “Intersection of 61 & 278 to Hiram,” “Intersection of 41 South in Marietta GA,” “Intersection of Allamond & Meretta,” and “Intersection of 75 to Atlanta.” Tri-State submitted U/D data for “Hwy 278 & Hwy 92.” *See* Complaint, Tabulation of Listener Declarations, Point Number 4. The listener did not allege interference at that location. The listener referred to “Intersection of 61 and 278.” That intersection is approximately four miles from the location Tri-State chose to calculate U/D data. *See* map at Exhibit A. The U/D data Tri-State provided does not reflect a listener location.

Listener number 5 (Vaughn) identified seven locations where interference was alleged to have occurred: “Intersection of Hwy. 278 near Dallas, GA,” “Intersection of Roswell Rd. near Marietta,” “Intersection of Barrett [illegible] in Marietta GA,” “Intersection of Hwy. 20 near Douglasville GA,” “2251 Tourney Drive, Marietta, GA,” “252 Cynthia Ct, Dallas, GA,” and “3740 Providence Rd., Marietta, GA.” Tri-State submitted U/D data for “Hwy 278 at Wellstar Paulding Hospital.” *See* Tabulation of Listener Declarations, Point Number 5. The listener did not allege interference at that location. The listener referred to “Intersection of Hwy. 278 near Dallas, GA.” The listener did not cite a specific location, address, or intersection on Highway 278 and did not reference Wellstar Paulding Hospital. Highway 278 is a major east-west highway that extends the length of Dallas and beyond it in two directions. *See* map at Exhibit B. Numerous roads and highways intersect Highway 278 “near” Dallas, including some that are

³ *Id.* at 3469; *see also* 47 C.F.R. § 74.1203(a)(3)(v).

several miles from the location chosen by Tri-State. The U/D data Tri-State provided does not reflect a listener location.

Tri-State was required to submit “a map plotting the specific locations of the alleged interference.”⁴ Assuming Tri-State’s map is based on the Tabulation of Listener Declarations, it includes invalid locations that render it noncompliant with Section 74.1203(ii).

Because Tri-State has not complied with the Commission’s requirements for U/D data submissions and maps plotting specific locations where interference is alleged to have occurred, the Complaint should be dismissed.

B. The Undesirable Signal is Not Within 20 dB of the Desirable Signal.

Tri-State’s Tabulation of Listener Complaints purports to show U/D ratios above -20 dB for all locations listed in the Tabulation. When the U/D ratios are accurately calculated using W266BW’s measured composite antenna pattern, they do not meet the -20 dB standard required for valid listener complaints.

W266BW uses a Scala CL-FM/SRM/SV antenna array which was specifically designed to fill the licensed envelope to the south but minimize signal toward WLJA-FM. Exhibit C is a map showing the measured composite antenna pattern compared to the licensed envelope antenna pattern. The map demonstrates the significant suppression of W266BW’s signal in the direction of WLJA-FM and to the northwest of Atlanta.

The licensed envelope antenna pattern is shown in detail in Exhibit D attached hereto. This exhibit provides a table that shows each 10 degree azimuth with its relative field, dBk, and kW based on an ERP of 0.250 kW. In comparison, the measured composite antenna pattern is

⁴ *Translator Interference Order* at 3469; *see also* 47 C.F.R. § 74.1203(a)(3)(ii).

shown in detail in Exhibit E.⁵ This exhibit provides a table that shows each 10 degree azimuth with its relative field, dBk, and kW based on an ERP of 0.250 kW. The differences are clear.

Exhibit F provides an updated table based on Tri-State's Tabulation of Listener Complaints. The actual undesired to desired signal strength does not exceed -20 dBu at the identified locations. Because the U/D signal does not meet the Commission's requirements, the Complaint should be dismissed.

C. Tri-State Has Not Supplied the Minimum Number of Listener Complaints.

Four of the listener complaints Tri-State submitted are invalid.⁶ Therefore, Tri-State has not supplied the minimum number of listener complaints.

In February 2023, Tri-State and Davis conducted joint testing at the locations listed in the Tabulation of Listener Complaints. The parties agreed that no interference was present at three of the locations.⁷ Specifically, W266BW had no effect on the signal of WLJA-FM at the locations of listener number 2 (Redmann), listener number 5 (Vaughn),⁸ and listener number 6 (Rakestraw).⁹ These three complaints must be excluded. With the elimination of these

⁵ See 47 C.F.R. 73.1204(b)(3).

⁶ This is in addition to the complaint the Commission already rejected. See Letter at 2 n.10.

⁷ Tri-State attempted to submit a "report" drafted by its consulting engineer entitled "On-Off Testing" as part of its April 26, 2023 e-mail to the Commission. The Commission declined to consider the report. See Letter at 1 n.2. Davis offers no conclusions regarding the purported findings of the report, but notes that Tri-State's consulting engineer stated in the document that there was no interference at these locations.

⁸ This complaint suffers from the additional deficiency discussed in Section I(A), *supra*.

⁹ While there is disagreement about the implications of the testing results at other locations, there is no disagreement that there was no interference at these three locations.

complaints and complaint number 4, *see supra* Section I(A), Tri-State has submitted at most six rule-compliant complaints.¹⁰

Tri-State acknowledged that it was required to submit a minimum of eight valid listener complaints. Tri-State's Engineering Statement stated that "the population within the WLJA-FM 60 dBu [is] 304,576 (2020 Census) [so] the resulting minimal number of complaints is 8." *See also* Complaint at 3 ("The population within the W266BW (sic) protected contour is 304,576 . . . [therefore] eight (8) is the minimum number of listener complaints to be included..."). Section 1203(a)(3)(i) of the Commission's rules states that a station serving between 300,000 and 399,000 people within its protected contour must supply a minimum number of eight valid listener complaints. 47 C.F.R. 1203(a)(3)(i) and Table 1.

Davis agrees with Tri-State. A study conducted by Davis's consulting engineer concludes that the population served by WLJA-FM within its 60 dBu contour is 313,721. *See Exhibit G* attached hereto. This figure is not materially different from Tri-State's determination that WLJA-FM serves 304,576 people. Under either population count, Tri-State was required to submit eight valid listener complaints.

The Commission stated in the Letter that the population within WLJA-FM's protected service contour is 251,735, and that Tri-State was therefore required to submit a minimum of seven rule-compliant listener complaints.¹¹ Tri-State's and Davis's findings differ significantly from this calculation. Davis respectfully asks the Commission to revisit its computation. However, given the invalidity of the four complaints referenced above, Tri-State has failed to meet its burden under either the Tri-State/Davis counts or the Commission's. Because the

¹⁰ Davis does not concede there is interference at these six locations. Moreover, Davis believes these complaints should be rejected for the reasons explained in Section I(B), *supra*.

¹¹ Letter at 2 n.7.

Complaint does not comply with Section 1203(a)(3)(i) of the Commission's rules, it should be dismissed.

II. WLJA-FM'S SIGNAL IS DISTANT AND TERRAIN-IMPAIRED.

Tri-State assumes that when listeners around Atlanta say they cannot receive WLJA-FM, interference by W266BW must be the cause. The reality is that WLJA-FM's signal is weak or non-existent in much of metropolitan Atlanta due to distance and terrain.

Some perspective is required. WLJA-FM is located in far north Georgia. Its transmitter site is closer to Tennessee than to Atlanta or its northern suburbs. The station's community of license is closer to Chattanooga, Tennessee (54 miles) than Atlanta (65 miles).¹² WLJA-FM's transmitter site is approximately 28 miles from the Tennessee state line, 50 miles from Hiram and Dallas, Georgia,¹³ and 59 miles from Atlanta.¹⁴ WLJA-FM is decidedly not an Atlanta-market station.¹⁵

WLJA-FM's signal is significantly terrain-impaired toward Atlanta. Attached hereto as Exhibit I are terrain studies showing the effect of the intervening terrain on WLJA-FM's signal between the transmitter site and Dallas, Georgia; Roswell, Georgia; Alpharetta, Georgia; and Marietta, Georgia – areas that are referenced in the Complaint. The results show that WLJA-FM's signal is notably impaired, if not entirely blocked, in these communities.

¹² Source: Google Earth Pro.

¹³ These communities are referenced in the Complaint.

¹⁴ Source: Google Earth Pro.

¹⁵ See FCC Geographic Market Definition for Atlanta, GA, attached hereto as Exhibit H.

Tri-State has made modifications to WLJA-FM to try to improve the station's signal in the direction of Atlanta.¹⁶ It is understandable that Tri-State is disappointed these modifications have not improved WLJA-FM's signal in the manner it had hoped. The reality, however, is that WLJA-FM does not and cannot provide a listenable signal in much of the metropolitan Atlanta area from its current transmitter site. W266BW is not the cause of this; distance and terrain are.

III. CONCLUSION

For the reasons set forth above, the Complaint is not a valid and complete interference claim package and should be dismissed.

Respectfully submitted,

DAVIS BROADCASTING OF ATLANTA, L.L.C.

By: /s/ F. Scott Pippin
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Lerman Senter PLLC
2001 L Street, NW, Suite 400
Washington, DC 20036
(202) 429-8970

June 9, 2023

Its Attorneys

¹⁶ See FCC File No. BPH-20141121AHT.

DECLARATION OF KEVIN YOUNGERS


I, Kevin Youngers, serve as consulting broadcast engineer to Davis Broadcasting of Atlanta, L.L.C.

I prepared the technical exhibits that are attached to this Response, including the data and maps for the licensed envelope antenna pattern and the measured composite antenna pattern, the tabulation of listener complaints measured in accordance with the actual antenna pattern fill, and the terrain studies from the WLJA-FM transmission site to suburban communities near Atlanta. I am familiar with the Scala CL-FM/SRM/SV antenna array and pattern used by W266BW.

Based on this information, it is my opinion that:

1. W266BW's signal is significantly attenuated to the north and northwest of Atlanta.
2. WLJA-FM's signal is significantly impeded toward the south.
3. The U/D levels at the locations listed in the Tabulation of Listener Complaints are all below -20 dB using the actual measured composite antenna pattern of W266BW.

I declare under penalty of perjury that the foregoing information is true and correct to the best of my knowledge, information and belief.


Kevin J. Youngers
Consulting Engineer

June 9, 2023

DECLARATION OF GREGORY DAVIS

I, Gregory Davis, am Manager of Davis Broadcasting of Atlanta, L.L.C.

I have read the Response to which this Declaration is attached. The statements made therein are true to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Gregory Davis", written in a cursive style.

Gregory Davis

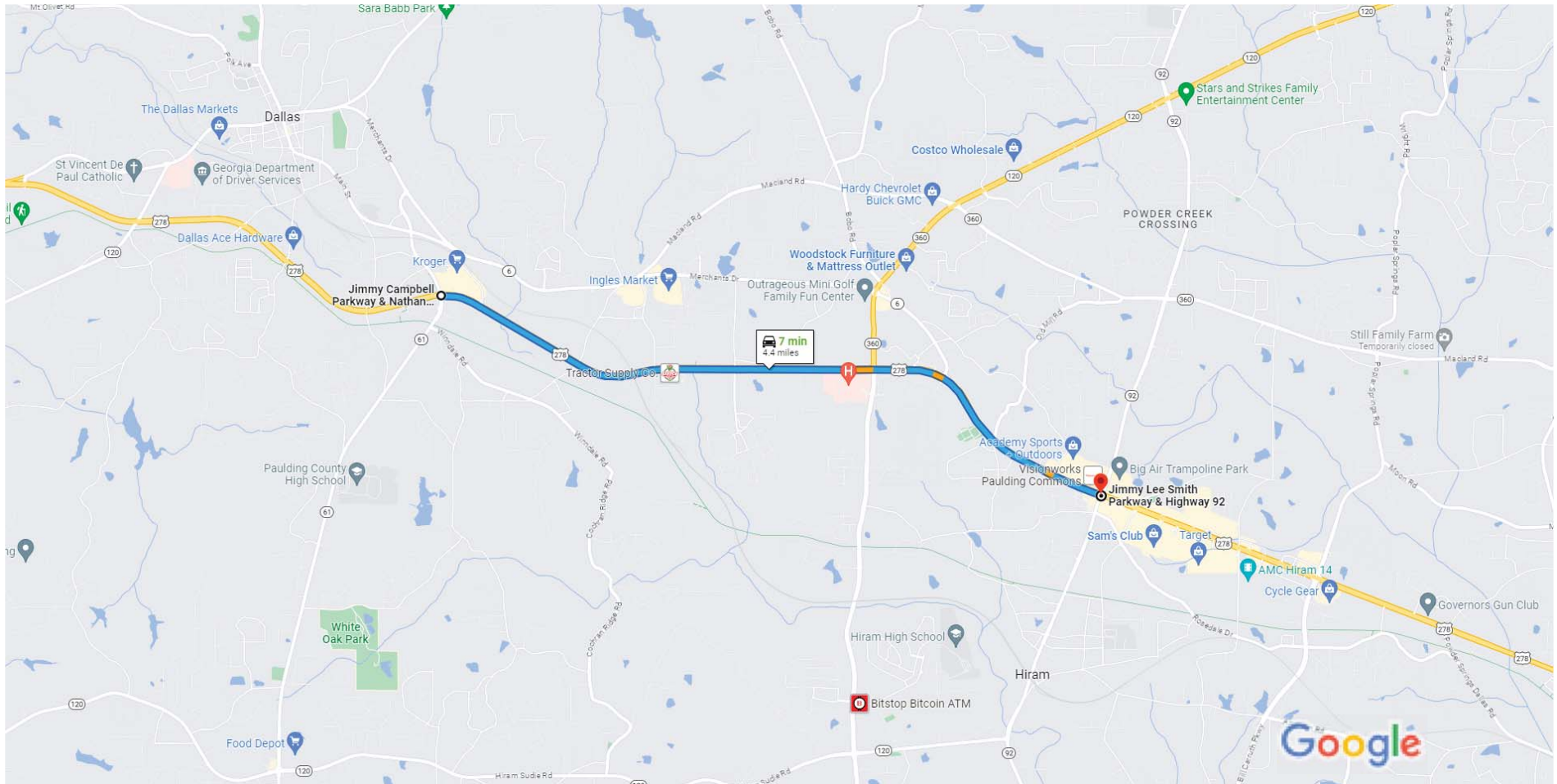
June 9, 2023

Exhibit A



Jimmy Campbell Pkwy & Nathan Dean Blvd, Dallas, Drive 4.4 miles, 7 min
GA 30157 to Jimmy Lee Smith Pkwy & Hwy 92, Hiram, GA 30141

"Hwy 278 and Hwy 92" vs. "Intersection of 61 and 278"



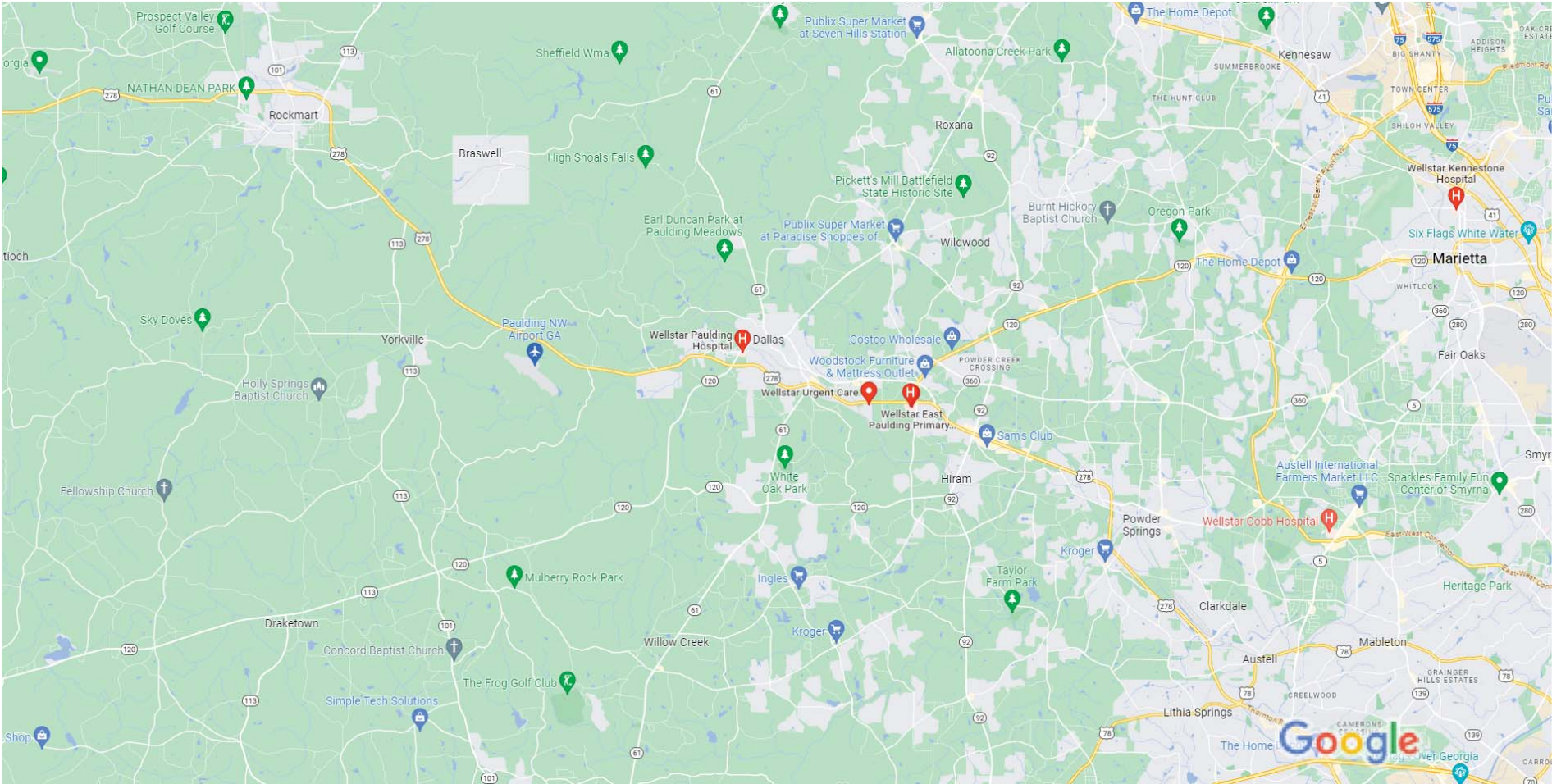
Map data ©2023 2000 ft

Exhibit B



hwy 278 at wellstar paudling hospital

"Highway 278 at Wellstar Paulding Hospital" vs. Highway 278 intersections "near" Dallas, GA



Map data ©2023 2 mi

Rating

Hours

All filters

Exhibit C

W266BW Licensed 60 dBu Contour (Blue)
W266BW Antenna Array Fill 60 dBu Contour (Red)

Coverage Study - NGDC 30 SEC
05-10-2023

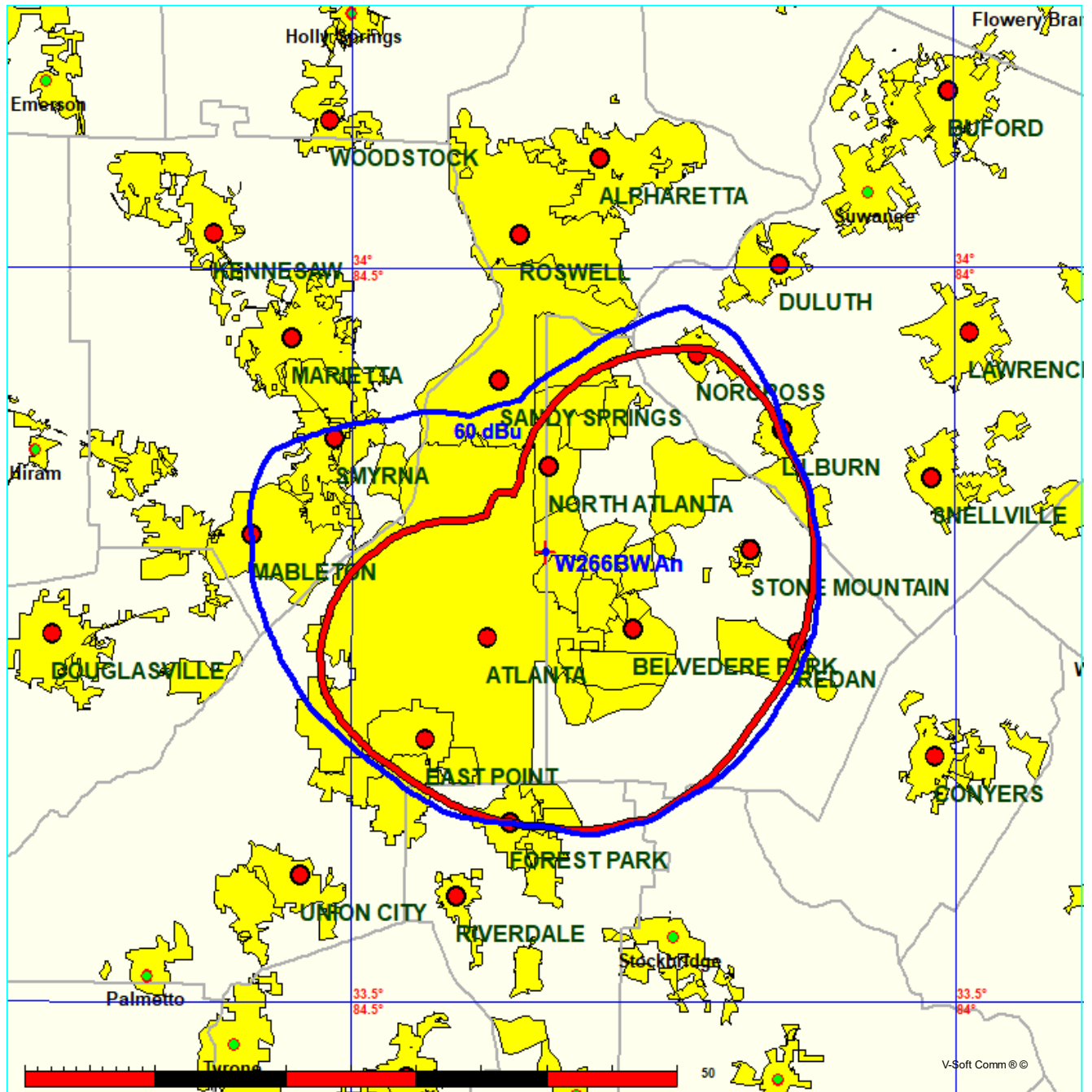


Exhibit D

Graph is Relative Field

Azi	Field	dBk	kW
000	0.400	-13.979	0.040
010	0.500	-12.041	0.063
020	0.710	-08.995	0.126
030	1.000	-06.021	0.250
040	1.000	-06.021	0.250
050	1.000	-06.021	0.250
060	1.000	-06.021	0.250
070	1.000	-06.021	0.250
080	1.000	-06.021	0.250
090	1.000	-06.021	0.250
100	1.000	-06.021	0.250
110	1.000	-06.021	0.250
120	1.000	-06.021	0.250
130	1.000	-06.021	0.250
140	1.000	-06.021	0.250
150	1.000	-06.021	0.250
160	1.000	-06.021	0.250
170	1.000	-06.021	0.250
180	0.940	-06.558	0.221
190	0.940	-06.558	0.221
200	1.000	-06.021	0.250
210	1.000	-06.021	0.250
220	1.000	-06.021	0.250
230	1.000	-06.021	0.250
240	1.000	-06.021	0.250
250	1.000	-06.021	0.250
260	1.000	-06.021	0.250
270	1.000	-06.021	0.250
280	1.000	-06.021	0.250
290	1.000	-06.021	0.250
300	0.710	-08.995	0.126
310	0.500	-12.041	0.063
320	0.400	-13.979	0.040
330	0.300	-16.478	0.023
340	0.300	-16.478	0.023
350	0.300	-16.478	0.023

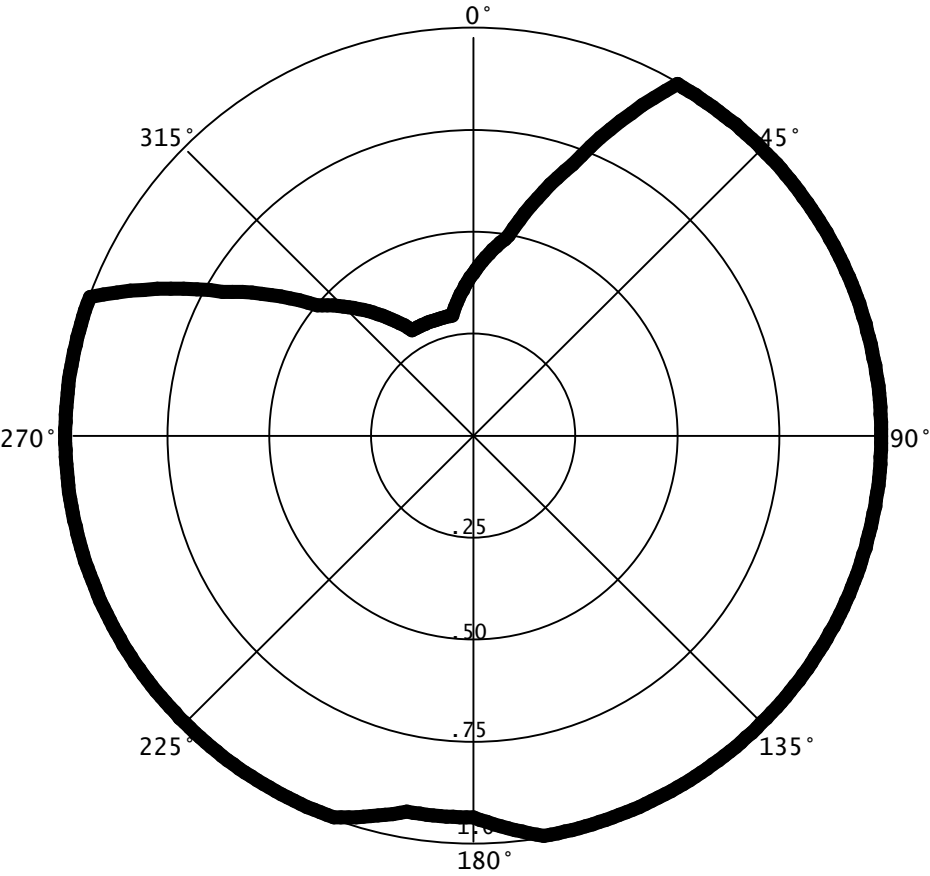


Exhibit E

Graph is Relative Field

Azi	Field	dBk	kW
000	0.240	-18.416	0.014
010	0.367	-14.727	0.034
020	0.526	-11.601	0.069
030	0.683	-9.332	0.117
040	0.823	-7.713	0.169
050	0.904	-6.897	0.204
060	0.961	-6.366	0.231
070	0.997	-6.047	0.249
080	0.994	-6.073	0.247
090	0.973	-6.258	0.237
100	0.953	-6.439	0.227
110	0.936	-6.595	0.219
120	0.934	-6.614	0.218
130	0.917	-6.773	0.210
140	0.948	-6.484	0.225
150	0.990	-6.108	0.245
160	0.994	-6.073	0.247
170	0.973	-6.258	0.237
180	0.953	-6.439	0.227
190	0.936	-6.595	0.219
200	0.936	-6.595	0.219
210	0.934	-6.614	0.218
220	0.949	-6.475	0.225
230	0.927	-6.679	0.215
240	0.838	-7.556	0.176
250	0.690	-9.244	0.119
260	0.512	-11.835	0.066
270	0.336	-15.494	0.028
280	0.196	-20.175	0.010
290	0.097	-26.285	0.002
300	0.071	-28.995	0.001
310	0.077	-28.291	0.001
320	0.082	-27.744	0.002
330	0.067	-29.499	0.001
340	0.083	-27.639	0.002
350	0.147	-22.674	0.005

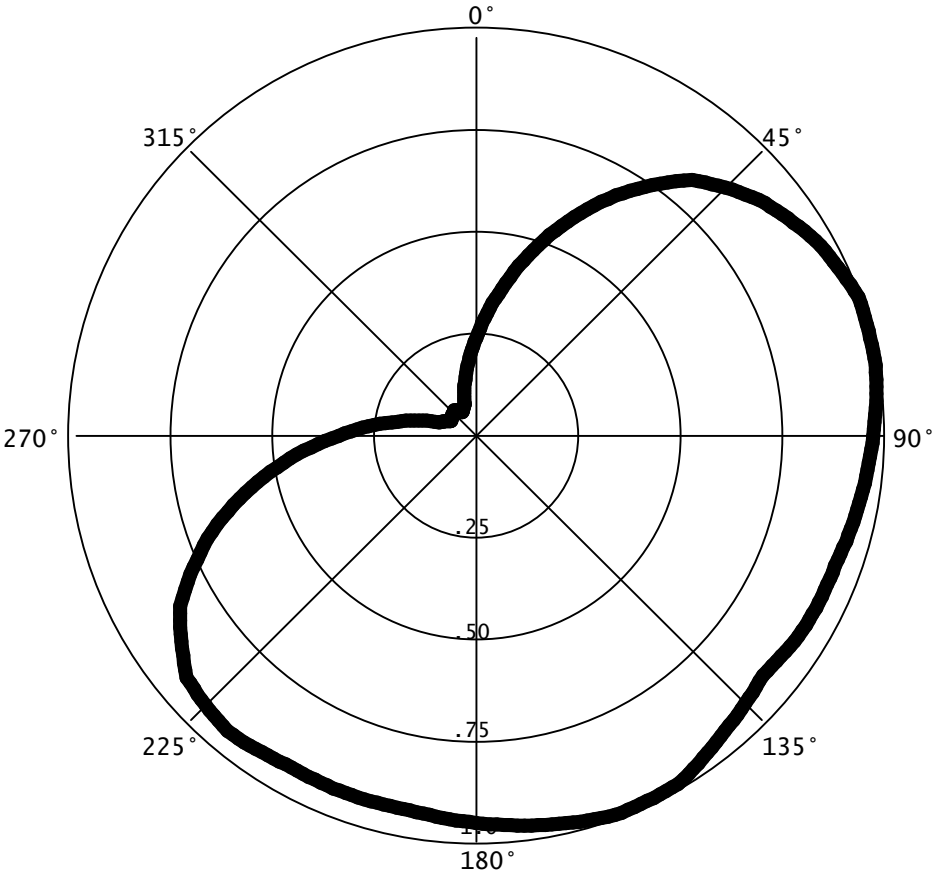


Exhibit F

WLJA-FM Tabulated Listener Complaint Adjusted for Antenna Pattern Fill

Point Number	Latitude	Longitude	Azimuth From W266BW site	Desirable WLJA-FM (dBu)	Undesirable Licensed W266BW (dBu)	Desirable/ Undesirable (dBu)	Adjustment to Actual Antenna Fill Pattern Interpolated (dBu)	Actual Desirable/ Undesirable (dBu)
1	34 02 34.41	84 20 28.56	359.60	51.10	32.20	18.90	-4.25	23.15
2	33 59 02.97	84 32 32.25	316.44	49.42	32.12	17.30	-14.65	31.95
3	34 03 58.17	84 15 23.65	14.83	49.98	30.27	19.71	-2.65	22.36
4	33 53 29.27	84 45 17.63	283.81	46.00	41.40	4.60	-16.48	21.08
5	33 54 06.94	84 46 44.96	284.64	46.21	39.84	6.37	-16.99	23.36
6	33 56 45.01	84 54 46.77	286.37	46.50	33.50	13.00	-18.05	31.05
7	34 02 18.02	84 20 35.46	359.20	51.00	32.64	18.36	-4.33	22.69
8	33 54 06.24	84 34 23.07	296.00	46.02	42.00	4.02	-20.13	24.15
9	33 57 04.11	84 30 37.84	315.38	47.15	35.50	11.65	-14.91	26.56
10	33 54 18.74	84 36 14.24	294.08	46.51	41.50	5.01	-20.17	25.18
11	33 53 12.75	84 44 25.58	283.54	45.91	42.20	3.71	-16.32	20.03

Exhibit G

WLJA(FM) PREDICTED 60 DBU
Tri-State Communications, Inc

Coverage Study - NGDC 30 SEC
05-16-2023

WLJA-FM CH266 C3, 21.5 kW, 111.6m HAAT, 537.0m COR AMSL
Service Contour = 60 dBu. Population = 313,721

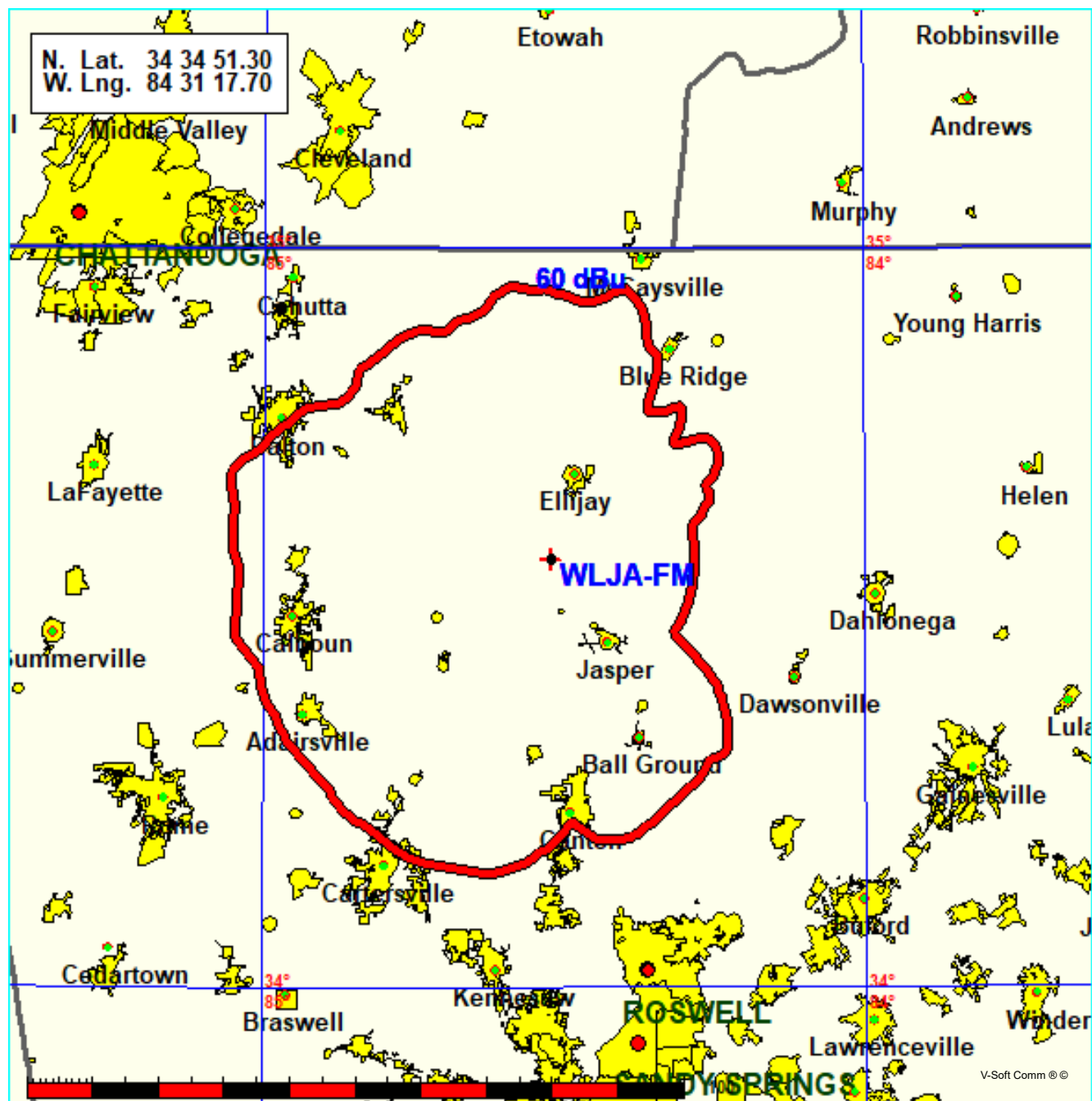


Exhibit H

FCC Geographic Market Definition for Atlanta, GA

Call Letters	AM/FM	Type		Home Market	Market			City & State of License	County of License
		Freq	Station	Format	Designtn Date	Home Mkt Rank	Owner		
WABE	FM	90.1	NC	Nws/Tlk/Inf	07/02/2003	7	City of Atlanta, Board of Education	Atlanta, GA	Fulton
WAEC	AM	860	C	Insprr/Talk	07/02/2003	7	Beasley Media Group LLC	Atlanta, GA	Fulton
WAFS	AM	1190	C	Religion	07/02/2003	7	Relevant Radio Inc	Atlanta, GA	Fulton
WAKL	FM	106.7	NC	ChrsContem	07/02/2003	7	Educational Media Foundation	Gainesville, GA	Hall
WALR	FM	104.1	C	RhyBI/UrbA	07/02/2003	7	Cox Media Group Inc	Palmetto, GA	Fulton
WAMJ	FM	107.5	C	Urban AC	07/02/2003	7	Urban One Inc	Roswell, GA	Fulton
WAOK	AM	1380	C	News/Talk	07/02/2003	7	Audacy	Atlanta, GA	Fulton
WAOS	AM	1600	C	Mexican	07/02/2003	7	La Favorita Inc	Austell, GA	Cobb
WAZX	AM	1550	C	DARK	07/02/2003	7	Hispanic Family Christian Network	Smyrna, GA	Cobb
WBHF	AM	1450	C	Oldies	07/02/2003	7	Anverse Inc	Cartersville, GA	Bartow
WBIN	AM	640	C	News/Talk	07/02/2003	7	iHeartMedia Inc	Atlanta, GA	Fulton
WBTR	FM	92.1	C	Country	07/02/2003	7	Gradick, Steven	Carrollton, GA	Carroll
WBZW	FM	96.7	C	Mexican	07/02/2003	7	iHeartMedia Inc	Union City, GA	Fulton
WBZY	FM	105.7	C	Span/CHR	07/02/2003	7	iHeartMedia Inc	Canton, GA	Cherokee
WCCV	FM	91.7	NC	CCtmp/Relg	07/02/2003	7	Immanuel Broadcasting Network Inc	Cartersville, GA	Bartow
WCFO	AM	1160	C	Religion	07/02/2003	7	Atlanta Catholic Radio Inc	East Point, GA	Fulton
WCHK	AM	1290	C	Trp/Pop/Hur	07/02/2003	7	Davis Broadcasting Inc	Canton, GA	Cherokee
WCKS	FM	102.7	C	Hot AC	11/01/2010	7	Gradick, Steven	Fruithurst, AL	Cleburne
WCLK	FM	91.9	NC	Jazz	07/02/2003	7	Clark Atlanta University	Atlanta, GA	Fulton
WCNN	AM	680	C	Sports	07/02/2003	7	Dickey Broadcasting Company	North Atlanta, GA	Fulton
WDCY	AM	1520	C	Christian	07/02/2003	7	Word Christian Broadcasting	Douglasville, GA	Douglas
WDPC	AM	1500	C	Christian	07/02/2003	7	Word Christian Broadcasting	Dallas, GA	Paulding
WDWD	AM	590	C	Chrst/Talk	07/02/2003	7	Salem Media Group Inc	Atlanta, GA	Fulton
WFOM	AM	1230	C	Talk	07/02/2003	7	Dickey Broadcasting Company	Marietta, GA	Cobb
WFSH	FM	104.7	C	ChrsContem	07/02/2003	7	Salem Media Group Inc	Athens, GA	Clarke
WFTD	AM	1080	C	Spanish AC	07/02/2003	7	Prieto Broadcasting Inc	Marietta, GA	Cobb
WGKA	AM	920	C	Talk/News	07/02/2003	7	Salem Media Group Inc	Atlanta, GA	Fulton
WHIE	AM	1320	C	Cty/Tlk/Spt	07/02/2003	7	Chappell Communications LLC	Griffin, GA	Spalding
WHTA	FM	107.9	C	Urban	07/02/2003	7	Urban One Inc	Hampton, GA	Henry
WIFN	AM	1340	C	Sports	07/02/2003	7	Dickey Broadcasting Company	Atlanta, GA	Fulton
WIGO	AM	1570	C	Variety	07/02/2003	7	Sheridan Broadcasting Corp	Morrow, GA	Clayton
WISK	AM	990	C	Mexican	02/14/2008	7	Sumter Broadcasting Co Inc	Lawrenceville, GA	Gwinnett
WJBB	AM	1300	C	Cisc Hits	07/02/2003	7	Batten, Jeffrey Taylor	Winder, GA	Barrow
WJZA	AM	1310	C	Jazz	07/02/2003	7	Davis Broadcasting Inc	Decatur, GA	De Kalb

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

FCC Geographic Market Definition for Atlanta, GA

Call Letters	AM/FM	Type		Home Market	Market			City & State of License	County of License
		Freq	Station	Format	Designtn Date	Home Mkt Rank	Owner		
WKEU	AM	1450	C	Oldes/Sprts	07/02/2003	7	WLT Associates LP	Griffin, GA	Spalding
WKHX	FM	101.5	C	Country	07/02/2003	7	Cumulus Media Holdings Inc	Marietta, GA	Cobb
WKKP	AM	1410	C	Country	07/02/2003	7	Henry County Radio Co	Mcdonough, GA	Henry
WKUN	AM	1490	C	Sothn Gspel	07/02/2003	7	Bostwick Broadcasting Group	Monroe, GA	Walton
WLBA	AM	1130	C	Mexican	07/02/2003	7	La Favorita Inc	Gainesville, GA	Cobb
WLBB	AM	1330	C	News/Talk	07/02/2003	7	Gradick, Steven	Carrollton, GA	Carroll
WLKQ	FM	102.3	C	Mexican	07/02/2003	7	Davis Broadcasting Inc	Buford, GA	Gwinnett
WLTA	AM	1400	C	Chrst/Talk	07/02/2003	7	Salem Media Group Inc	Alpharetta, GA	Fulton
WLYG	FM	88.3	NC	Sothn Gspel	10/27/2003	7	Joy Christian Ministries	Jasper, GA	Pickens
WMDG	AM	1260	C	DARK	07/02/2003	7	Murray, Christopher	East Point, GA	Fulton
WMLB	AM	1690	C	Talk	10/08/2004	7	Disruptor Radio, LLC	Avondale Estates, GA	De Kalb
WMVV	FM	90.7	NC	Relgn/Inspr	07/02/2003	7	Life Radio Ministries	Griffin, GA	Spalding
WMVW	FM	91.7	NC	Relgn/Inspr	05/14/2010	7	Life Radio Ministries	Peachtree City, GA	Fayette
WNEA	AM	1300	C	Christian	07/02/2003	7	Word Christian Broadcasting	Newnan, GA	Coweta
WNIV	AM	970	C	Chrst/Talk	07/02/2003	7	Salem Media Group Inc	Atlanta, GA	Fulton
WNNX	FM	100.5	C	Alternative	07/02/2003	7	Cumulus Media Holdings Inc	College Park, GA	Fulton
WNSY	FM	100.1	C	Jazz	07/02/2003	7	Davis Broadcasting Inc	Talking Rock, GA	Pickens
WPBS	AM	1040	C	Asian	07/02/2003	7	Nguyen, Vanessa	Conyers, GA	Rockdale
WPLO	AM	610	C	Span/Oldes	07/02/2003	7	Esquivel, Teresa	Grayson, GA	Gwinnett
WPZE	FM	102.5	C	Inspr/UGspl	07/02/2003	7	Urban One Inc	Mableton, GA	Cobb
WQXI	AM	790	C	Korean	07/02/2003	7	Park, Kyung Sook	Atlanta, GA	Fulton
WRAS	FM	88.5	NC	News/Ecltc	07/02/2003	7	Georgia State University	Atlanta, GA	Fulton
WRDG	FM	105.3	C	Urban	07/02/2003	7	iHeartMedia Inc	Bowdon, GA	Carroll
WREK	FM	91.1	NC	Variety	07/02/2003	7	Georgia Institute of Technology, Communications	Atlanta, GA	Fulton
WRFG	FM	89.3	NC	Variety	07/02/2003	7	Radio Free Georgia Broadcasting Foundation	Atlanta, GA	Fulton
WRZX	AM	1400	C	Sports	07/02/2003	7	iHeartMedia Inc	Newnan, GA	Coweta
WSB	AM	750	C	News/Talk	07/02/2003	7	Cox Media Group Inc	Atlanta, GA	Fulton
WSB	FM	98.5	C	AC	07/02/2003	7	Cox Media Group Inc	Atlanta, GA	Fulton
WSBB	FM	95.5	C	News/Talk	07/02/2003	7	Cox Media Group Inc	Doraville, GA	De Kalb
WSRV	FM	97.1	C	Clsc Hits	07/02/2003	7	Cox Media Group Inc	Gainesville, GA	Hall
WSTR	FM	94.1	C	Rhymc/AC	07/02/2003	7	Audacy	Smyrna, GA	Cobb
WTSH	FM	107.1	C	Mexican	07/02/2003	7	Woman's World Broadcasting Inc	Aragon, GA	Polk
WTZA	AM	1010	C	Urban	07/02/2003	7	Light Media Holdings Inc	Atlanta, GA	Fulton
WUBL	FM	94.9	C	Country	07/02/2003	7	iHeartMedia Inc	Atlanta, GA	Fulton

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

FCC Geographic Market Definition for Atlanta, GA

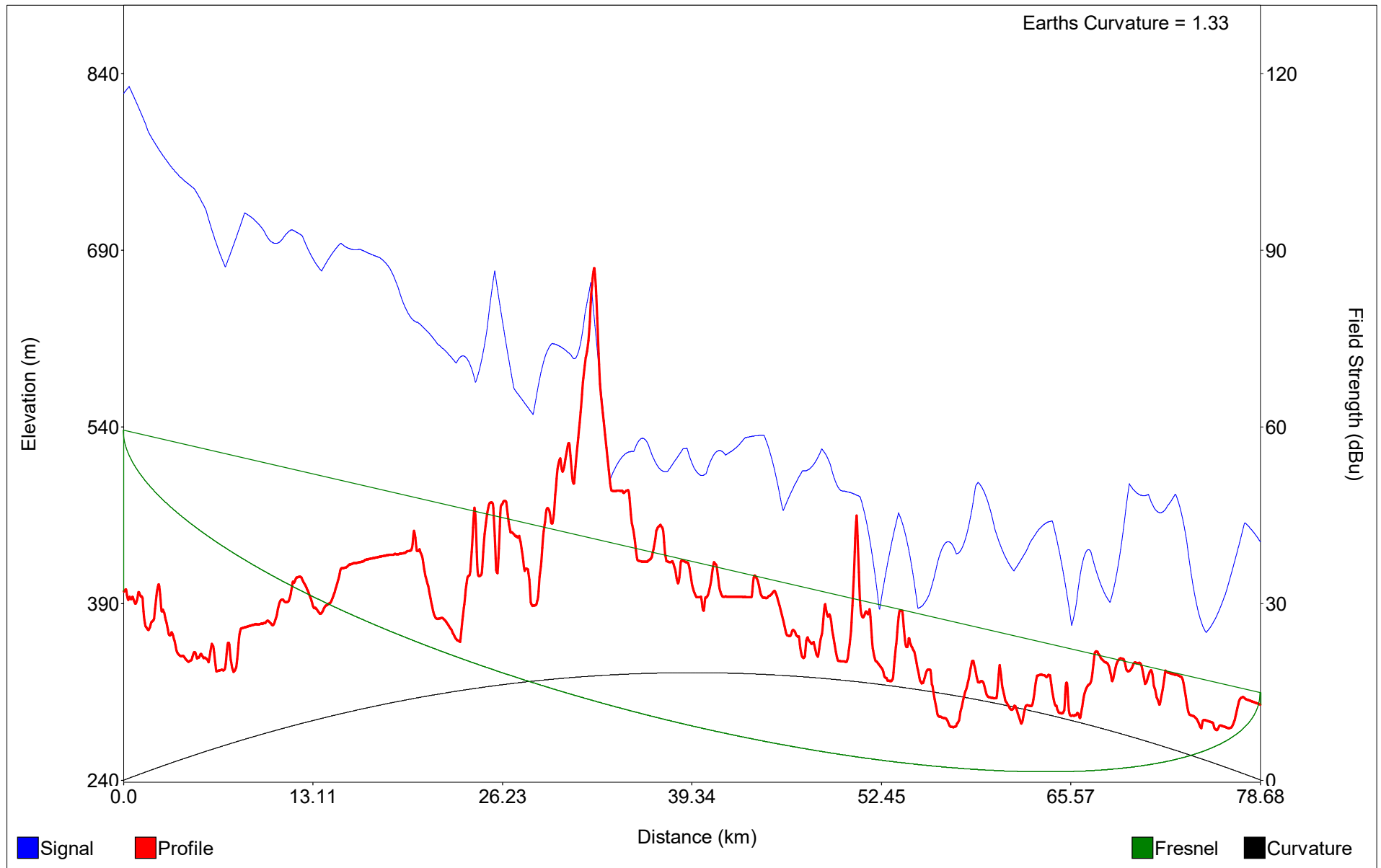
Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market			City & State of License	County of License
							Designtn Date	Home Mkt Rank	Owner		
WUMJ	FM	97.5	C	Urban	AC	Atlanta, GA	07/02/2003	7	Urban One Inc	Fayetteville, GA	Fayette
WUWG	FM	90.7	NC	NPR/CIs/Jaz	Atlanta, GA	Atlanta, GA	07/02/2003	7	Georgia Public Telecommunications Commission	Carrollton, GA	Carroll
WVEE	FM	103.3	C	Urban		Atlanta, GA	07/02/2003	7	Audacy	Atlanta, GA	Fulton
WVFJ	FM	93.3	NC	ChrsContem	Atlanta, GA	Atlanta, GA	07/02/2003	7	Radio Training Network, Inc	Greenville, GA	Meriwether
WWEV	FM	91.5	NC	ChrsContem	Atlanta, GA	Atlanta, GA	07/02/2003	7	War Hill Christian Fellowship Inc	Cumming, GA	Forsyth
WWPW	FM	96.1	C	Top 40		Atlanta, GA	07/02/2003	7	iHeartMedia Inc	Atlanta, GA	Fulton
WWSZ	AM	1420	C	Urban		Atlanta, GA	07/02/2003	7	JDJ Communications LLC	Decatur, GA	De Kalb
WWWE	AM	1100	C	Var/Spt/Tlk	Atlanta, GA	Atlanta, GA	07/02/2003	7	Beasley Media Group LLC	Hapeville, GA	Carroll
WWWQ	FM	99.7	C	CHR		Atlanta, GA	07/02/2003	7	Cumulus Media Holdings Inc	Atlanta, GA	Fulton
WXEM	AM	1460	C	Mexican	Atlanta, GA	Atlanta, GA	07/02/2003	7	La Favorita Inc	Buford, GA	Gwinnett
WXJO	AM	1120	C	Urban Gosp	Atlanta, GA	Atlanta, GA	07/03/2006	7	Condrey Media LLC	Douglasville, GA	Douglas
WYFW	FM	89.5	NC	Christian		Atlanta, GA	07/02/2003	7	Bible Broadcasting Network Inc	Winder, GA	Barrow
WYKG	AM	1430	C	Urban Gosp	Atlanta, GA	Atlanta, GA	07/02/2003	7	Light Media Holdings Inc	Covington, GA	Newton
WYYZ	AM	1490	C	Variety		Atlanta, GA	07/02/2003	7	KRMA Media Group LLC	Jasper, GA	Pickens
WYZE	AM	1480	C	Gospel		Atlanta, GA	07/02/2003	7	New Ground Broadcasting LLC	Atlanta, GA	Fulton
WZGC	FM	92.9	C	Sports		Atlanta, GA	07/02/2003	7	Audacy	Atlanta, GA	Fulton
Number of Stations in Geographic Market 84											
Previous Stations in Geographic Market											
WLVG	FM	105.1	NC	ChrsContem			08/03/2005	0	Educational Media Foundation	Clermont, GA	Hall

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

Exhibit I

Terrain from WLJA Site to Dallas



Starting Latitude: 34-34-51.30 N
Starting Longitude: 084-31-17.70 W

End Latitude: 33-55-26.03 N
End Longitude: 084-50-36.55 W

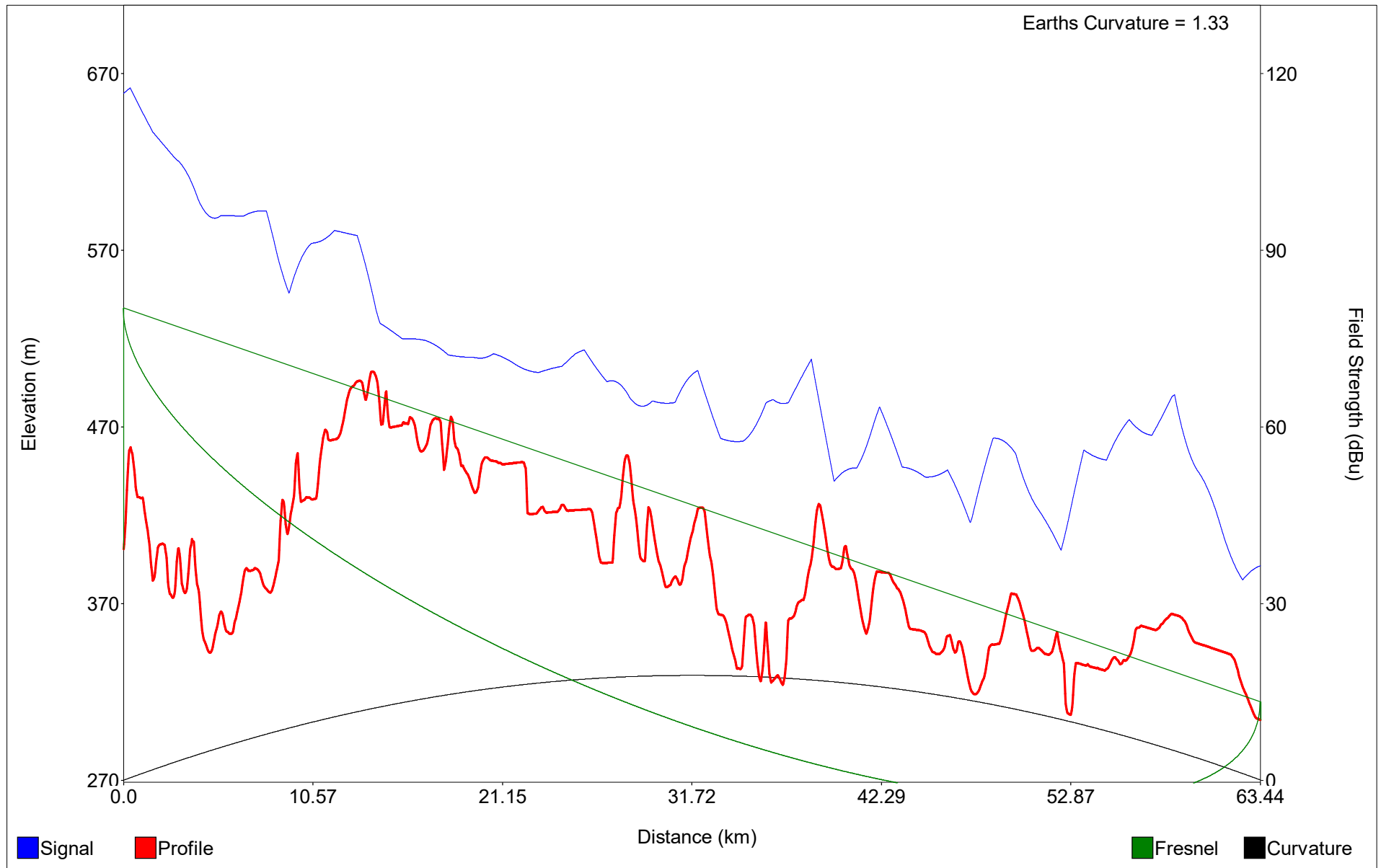
Distance: 78.68 km
Bearing: 202.23 deg

Transmitter Height (AG) = 136.4 m
Receiver Height (AG) = 10.0 m

Transmitter Elevation = 400.6 m
Receiver Elevation = 304.1 m

Frequency = 101.1 MHz
Fresnel Zone: 0.6

Terrain from WLJA Site to Roswell



Starting Latitude: 34-34-51.30 N
Starting Longitude: 084-31-17.70 W

End Latitude: 34-01-27.84 N
End Longitude: 084-21-45.33 W

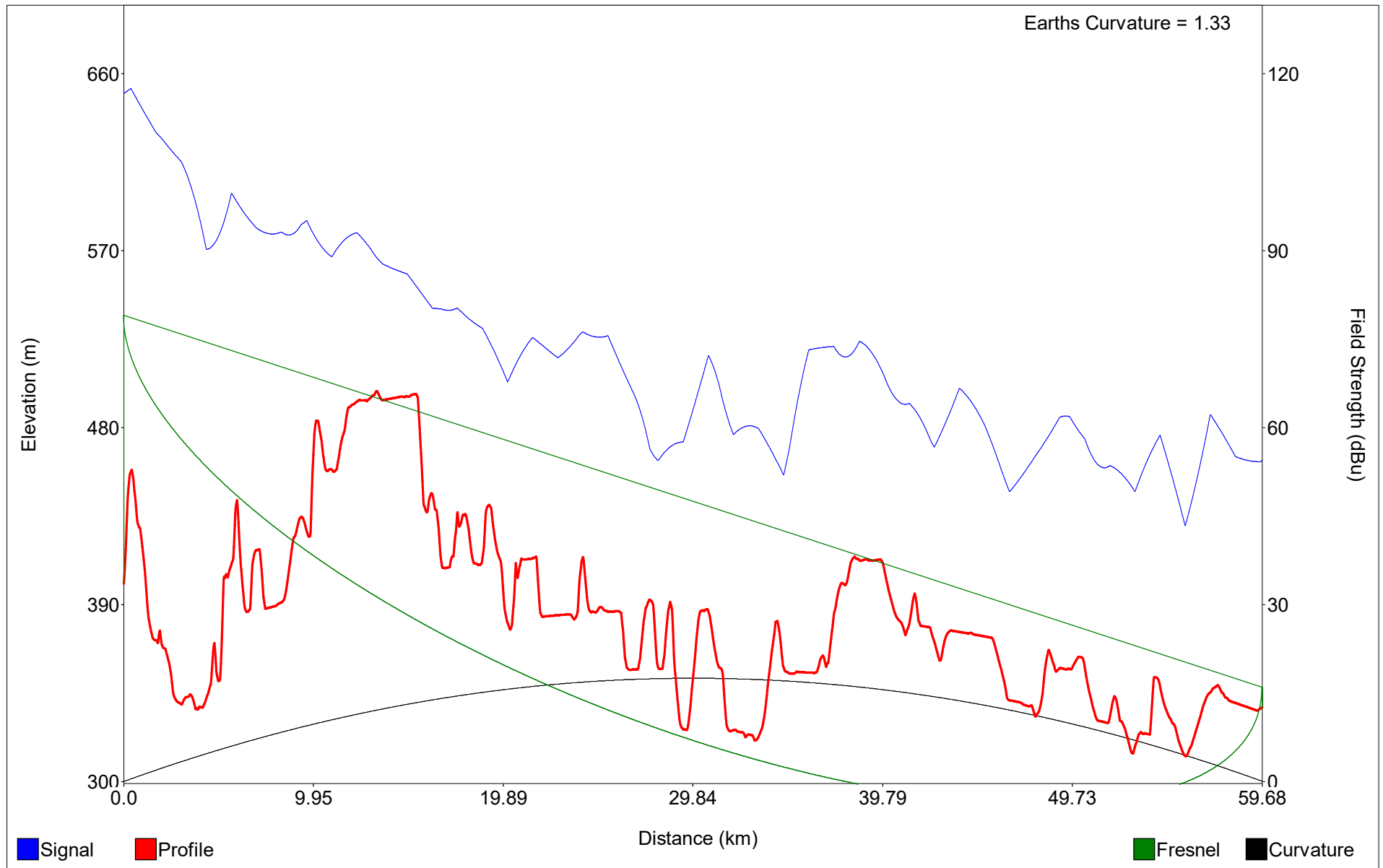
Distance: 63.44 km
Bearing: 166.62 deg

Transmitter Height (AG) = 136.4 m
Receiver Height (AG) = 10.0 m

Transmitter Elevation = 400.6 m
Receiver Elevation = 304.1 m

Frequency = 101.1 MHz
Fresnel Zone: 0.6

Terrain from WLJA Site to Alpharetta



Starting Latitude: 34-34-51.30 N

Starting Longitude: 084-31-17.70 W

End Latitude: 34-04-36.38 N

End Longitude: 084-17-42.47 W

Distance: 59.68 km

Bearing: 159.50 deg

Transmitter Height (AG) = 136.4 m

Receiver Height (AG) = 10.0 m

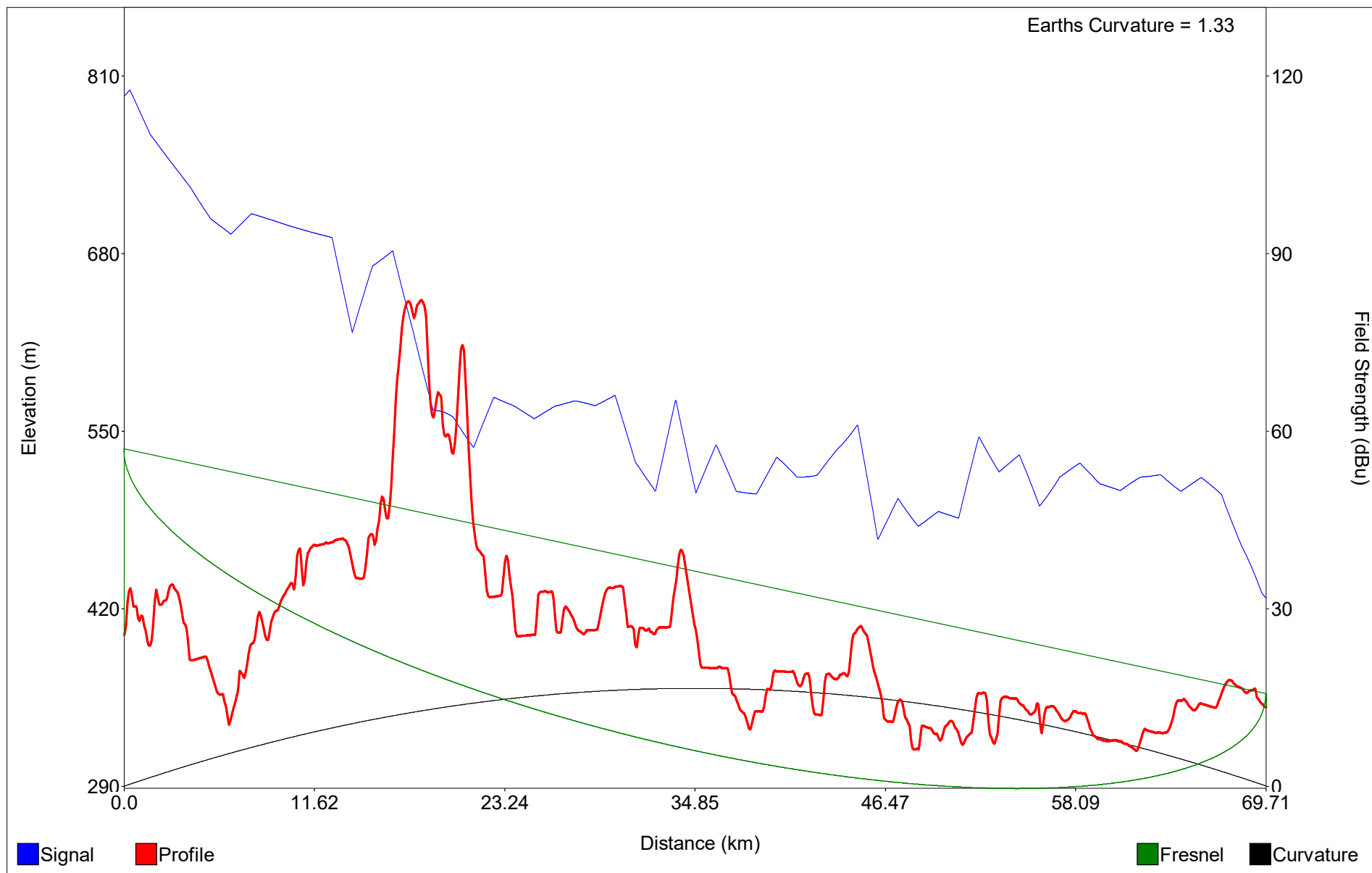
Transmitter Elevation = 400.6 m

Receiver Elevation = 337.7 m

Frequency = 101.1 MHz

Fresnel Zone: 0.6

Terrain from WLJA Site to Marietta



Starting Latitude: 34-34-51.30 N
Starting Longitude: 084-31-17.70 W

End Latitude: 33-57-10.59 N
End Longitude: 084-33-00.75 W

Distance: 69.71 km
Bearing: 182.18 deg

Transmitter Height (AG) = 136.4 m
Receiver Height (AG) = 10.0 m

Transmitter Elevation = 400.6 m
Receiver Elevation = 347.6 m

Frequency = 101.1 MHz
Fresnel Zone: 0.6

CERTIFICATE OF SERVICE

I, F. Scott Pippin, hereby certify that on this 9th day of June 2023, a true and correct copy of the foregoing Opposition was sent by first-class, postage prepaid mail to the following:

Mark B. Denbo
Smithwick & Belendiuk, P.C.
5028 Wisconsin Avenue, N.W., Suite 301
Washington, D.C. 20016

A copy by e-mail was also provided.

/s/
F. Scott Pippin