

MULTIPLE OWNERSHIP SHOWING

CBS Radio Holdings Inc. (“CBS Radio”) hereby demonstrates that grant of the instant application will be fully consistent with the Commission’s local radio multiple ownership rule. By this application, CBS Radio proposes an electrical adjustment to the existing directional array for KPTK(AM), Seattle, Washington, Facility ID No.6387. No new physical construction is being proposed.

The Commission’s local radio multiple ownership rule provides that in markets with 45 or more (inclusive) 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,” in those markets so designated by Arbitron. *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, KPTK(AM), which is licensed to Seattle, Washington, is deemed to be a part of the Seattle-Tacoma, Washington Arbitron Metro. According to BIA Research, Inc.’s *Media Access Pro* database as of July 5, 2007 (see the attached *FCC Geographic Market Definition Report for the Seattle-Tacoma Metro*), there are well in excess of 45 full-power, commercial and noncommercial radio stations licensed to communities within the Seattle-Tacoma Metro or which Arbitron designates as “home” to the Seattle-Tacoma Metro. Accordingly, the current local radio

ownership rule permits CBS Radio to have a cognizable interest in up to eight commercial radio stations (with five in the same service) in the Seattle-Tacoma Metro. As shown on the attached *FCC Geographic Market Definition Report for Seattle-Tacoma, WA*, CBS Radio has a cognizable interest in five commercial radio stations (4 FM stations, and 1 AM station (KBKS-FM; KJAQ(FM); KMPS-FM; KPTK(AM); and KZOK-FM) in the Seattle-Tacoma Metro, and will continue to have a cognizable interest in five commercial radio stations (4 FM stations and 1 AM station) upon a grant of the instant application.

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



FCC Geographic Market Definition for Seattle-Tacoma, WA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KKMO	AM	1360	C	Span/Talk	Seattle-Tacoma, WA	07/02/2003	14	Salem Communications Corporation	Tacoma, WA	Pierce
KDDS	FM	99.3	C	Mexican	Seattle-Tacoma, WA	07/02/2003	14	Bustos Media Enterprises LLC	Elma, WA	Grays Harbor
KWMG	AM	1210	C	Span/CHR	Seattle-Tacoma, WA	07/02/2003	14	Bustos Media Enterprises LLC	Auburn-Federal Way, WA	King
KRKO	AM	1380	C	Sports	Seattle-Tacoma, WA	07/02/2003	14	SR Broadcasting Inc	Everett, WA	Snohomish
KBLE	AM	1050	C	Christian	Seattle-Tacoma, WA	07/02/2003	14	Sacred Heart Radio Inc	Seattle, WA	King
KMTT	FM	103.7	C	Adult Rock	Seattle-Tacoma, WA	07/02/2003	14	Entercom	Tacoma, WA	Pierce
KBRO	AM	1490	C	Span/Relgn	Seattle-Tacoma, WA	07/02/2003	14	Seattle Streaming Radio LLC	Bremerton, WA	Kitsap
KCIS	AM	630	C	Inspiration	Seattle-Tacoma, WA	07/02/2003	14	Crista Ministries	Edmonds, WA	Snohomish
KCMS	FM	105.3	C	ChrsContem	Seattle-Tacoma, WA	07/02/2003	14	Crista Ministries	Edmonds, WA	Snohomish
KGRG	AM	1330	C	Altve/Oldes	Seattle-Tacoma, WA	07/02/2003	14	Green River Foundation	Enumclaw, WA	King
KWJZ	FM	98.9	C	Smooth	Seattle-Tacoma, WA	07/02/2003	14	Sandusky Radio	Seattle, WA	King
KGY	AM	1240	C	AC	Seattle-Tacoma, WA	07/02/2003	14	KGY Inc	Olympia, WA	Thurston
KRWM	FM	106.9	C	Soft AC	Seattle-Tacoma, WA	07/02/2003	14	Sandusky Radio	Bremerton, WA	Kitsap
KPTK	AM	1090	C	Talk	Seattle-Tacoma, WA	07/02/2003	14	CBS Radio	Seattle, WA	King
KING	FM	98.1	C	Classical	Seattle-Tacoma, WA	07/02/2003	14	Beethoven	Seattle, WA	King
KIRO	AM	710	C	Nws/Tlk/Spt	Seattle-Tacoma, WA	07/02/2003	14	p Bonneville International Corp	Seattle, WA	King
KWDB	AM	1110	C	Adult Hits	Seattle-Tacoma, WA	07/02/2003	14	West Beach Broadcasting	Oak Harbor, WA	Island
KISW	FM	99.9	C	Rock	Seattle-Tacoma, WA	07/02/2003	14	Entercom	Seattle, WA	King
KJR-	FM	95.7	C	Clsc Hits	Seattle-Tacoma, WA	07/02/2003	14	p Clear Channel	Seattle, WA	King
KLFE	AM	1590	C	Chrst/Talk	Seattle-Tacoma, WA	07/02/2003	14	Salem Communications Corporation	Seattle, WA	King
KJR	AM	950	C	Sports	Seattle-Tacoma, WA	07/02/2003	14	p Clear Channel	Seattle, WA	King
KSUH	AM	1450	C	Korean	Seattle-Tacoma, WA	07/02/2003	14	Suh, Jean	Puyallup, WA	Pierce
KKDZ	AM	1250	C	Family Hits	Seattle-Tacoma, WA	07/02/2003	14	ABC/Disney	Seattle, WA	King
KNTB	AM	1480	C	Span/Relgn	Seattle-Tacoma, WA	07/02/2003	14	Seattle Streaming Radio LLC	Lakewood, WA	Snohomish
KXPA	AM	1540	C	Divrs/Ethnc	Seattle-Tacoma, WA	07/02/2003	14	Multicultural Radio Broadcasting Inc	Bellevue, WA	King
KQMV	FM	92.5	C	Rhymc/AC	Seattle-Tacoma, WA	07/02/2003	14	Sandusky Radio	Bellevue, WA	King
KWPZ	FM	106.5	C	ChrsContem	Seattle-Tacoma, WA	07/02/2003	14	Crista Ministries	Lynden, WA	Whatcom
KNBQ	FM	102.9	C	Country	Seattle-Tacoma, WA	10/25/2005	14	p Clear Channel	Centralia, WA	Lewis
KKOL	AM	1300	C	News/Talk	Seattle-Tacoma, WA	07/02/2003	14	Salem Communications Corporation	Seattle, WA	King
KMPS	FM	94.1	C	Country	Seattle-Tacoma, WA	07/02/2003	14	CBS Radio	Seattle, WA	King
KBSG	FM	97.3	C	Clsc Hits	Seattle-Tacoma, WA	07/02/2003	14	p Bonneville International Corp	Tacoma, WA	Pierce
KOMO	AM	1000	C	News	Seattle-Tacoma, WA	07/02/2003	14	Fisher Communications Inc	Seattle, WA	King
KPLZ	FM	101.5	C	Hot AC	Seattle-Tacoma, WA	07/02/2003	14	Fisher Communications Inc	Seattle, WA	King
KGTK	AM	920	C	Talk	Seattle-Tacoma, WA	07/02/2003	14	Gottlieb, Alan M.	Olympia, WA	Thurston

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

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Seattle-Tacoma, WA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KKNW	AM	1150	C	News/Talk	Seattle-Tacoma, WA	07/02/2003	14	Sandusky Radio	Seattle, WA	King
KJAQ	FM	96.5	C	Jack	Seattle-Tacoma, WA	07/02/2003	14	CBS Radio	Seattle, WA	King
KNDD	FM	107.7	C	Alternative	Seattle-Tacoma, WA	07/02/2003	14	Entercom	Seattle, WA	King
KRIZ	AM	1420	C	R&B Oldies	Seattle-Tacoma, WA	07/02/2003	14	KRIZ Broadcasting Inc	Renton, WA	King
KBKS	FM	106.1	C	AC	Seattle-Tacoma, WA	07/02/2003	14	CBS Radio	Tacoma, WA	Pierce
KKWF	FM	100.7	C	Country	Seattle-Tacoma, WA	07/02/2003	14	Entercom	Seattle, WA	King
KFMY	FM	97.7	C	Clsc Hits	Seattle-Tacoma, WA	10/29/2004	14	South Sound Broadcasting, LLC	Raymond, WA	Pacific
KHHO	AM	850	C	Sports	Seattle-Tacoma, WA	07/02/2003	14	p Clear Channel	Tacoma, WA	Pierce
KUBE	FM	93.3	C	CHR	Seattle-Tacoma, WA	07/02/2003	14	p Clear Channel	Seattle, WA	King
KUOW	FM	94.9	NC	NPR/Nws/Inf	Seattle-Tacoma, WA	07/02/2003	14	University of Washington	Seattle, WA	King
KVI	AM	570	C	Talk	Seattle-Tacoma, WA	07/02/2003	14	Fisher Communications Inc	Seattle, WA	King
KWYZ	AM	1230	C	Korean	Seattle-Tacoma, WA	07/02/2003	14	Suh, Jean	Everett, WA	Snohomish
KTTH	AM	770	C	Talk	Seattle-Tacoma, WA	07/02/2003	14	p Bonneville International Corp	Seattle, WA	King
KZOK	FM	102.5	C	Clsc Rock	Seattle-Tacoma, WA	07/02/2003	14	CBS Radio	Seattle, WA	King
KLDY	AM	1280	NC	Classical	Seattle-Tacoma, WA	07/02/2003	14	Seattle Streaming Radio LLC	Lacey, WA	Thurston
KZIZ	AM	1560	C	Gsp/Inp/Tlk	Seattle-Tacoma, WA	07/02/2003	14	KRIZ Broadcasting Inc	Sumner, WA	Pierce
KUOW	AM	1340	NC	NPR/Nws/Inf	Seattle-Tacoma, WA	07/02/2003	14	KUOW/Puget Sound Public Radio	Tumwater, WA	Thurston
KXXO	FM	96.1	C	Soft AC	Seattle-Tacoma, WA	07/02/2003	14	3 Cities Inc	Olympia, WA	Thurston
KBRD	AM	680	NC	Nostalgia	Seattle-Tacoma, WA	07/02/2003	14	Estate of Larry D. 'Skip' Marrow	Lacey, WA	Thurston
KITZ	AM	1400	C	Talk	Seattle-Tacoma, WA	07/02/2003	14	Gottlieb, Alan M.	Silverdale, WA	Kitsap
KGNW	AM	820	C	Chrst/Talk	Seattle-Tacoma, WA	07/02/2003	14	Salem Communications Corporation	Burien-Seattle, WA	King
KIXI	AM	880	C	Nostalgia	Seattle-Tacoma, WA	07/02/2003	14	Sandusky Radio	Mercer Island, WA	King
KFNK	FM	104.9	C	Rock	Seattle-Tacoma, WA	07/02/2003	14	p Clear Channel	Eatonville, WA	Pierce
KLAY	AM	1180	C	Nws/Tlk/Spt	Seattle-Tacoma, WA	07/02/2003	14	Huntington, Clay	Lakewood, WA	Snohomish
KARR	AM	1460	NC	Religion	Seattle-Tacoma, WA	07/02/2003	14	Family Stations Inc	Kirkland, WA	King
KMIH	FM	104.5	NC	CHR	Seattle-Tacoma, WA	07/02/2003	14	Mercer Island School District #400	Mercer Island, WA	King
KAOS	FM	89.3	NC	Variety	Seattle-Tacoma, WA	07/02/2003	14	Evergreen State College	Olympia, WA	Thurston
KASB	FM	89.3	NC	Alternative	Seattle-Tacoma, WA	07/02/2003	14	Bellevue School District 405	Bellevue, WA	King
KBCS	FM	91.3	NC	Variety	Seattle-Tacoma, WA	07/02/2003	14	Bellevue Community College	Bellevue, WA	King
KXOT	FM	91.7	NC	NPR/Nws/TI	Seattle-Tacoma, WA	07/02/2003	14	Public Radio Capital Inc	Tacoma, WA	Pierce
KEXP	FM	90.3	NC	Variety	Seattle-Tacoma, WA	07/02/2003	14	University of Washington	Seattle, WA	King
KGHP	FM	89.9	NC	AAA	Seattle-Tacoma, WA	07/02/2003	14	Peninsula School District No. 401	Gig Harbor, WA	Pierce
KGRG	FM	89.9	NC	Modern	Seattle-Tacoma, WA	07/02/2003	14	Green River Foundation	Auburn, WA	King
KNHC	FM	89.5	NC	Top40/Danc	Seattle-Tacoma, WA	07/02/2003	14	Seattle Public Schools	Seattle, WA	King

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KPLU	FM	88.5	NC	Jazz/NPR	Seattle-Tacoma, WA	07/02/2003	14	Pacific Lutheran University	Tacoma, WA	Pierce
KSER	FM	90.7	NC	Variety	Seattle-Tacoma, WA	07/02/2003	14	KSER Foundation	Everett, WA	Snohomish
KUPS	FM	90.1	NC	AOR	Seattle-Tacoma, WA	07/02/2003	14	University of Puget Sound	Tacoma, WA	Pierce
KVTI	FM	90.9	NC	CHR	Seattle-Tacoma, WA	07/02/2003	14	Clover Park Technical College	Tacoma, WA	Pierce
KWFJ	FM	89.7	NC	Christian	Seattle-Tacoma, WA	07/02/2003	14	Calvary Baptist Church	Roy, WA	Pierce
KYIZ	AM	1620	C	UCH/HHp/V	Seattle-Tacoma, WA	07/02/2003	14	KRIZ Broadcasting Inc	Renton, WA	King
KDOW	AM	1680	C	Ethnic	Seattle-Tacoma, WA	07/02/2003	14	Salem Communications Corporation	Seattle, WA	King
KPLI	FM	90.1	NC	Jazz/NPR	Seattle-Tacoma, WA	04/26/2005	14	Pacific Lutheran University	Olympia, WA	Thurston

Number of Stations in Geographic Market 76

Previous Stations in Geographic Market