

EXHIBIT 16

COMPLIANCE WITH SECTION 73.3555

As part of the proposed transaction, WCLY-AM, LLC would become the licensee of WCLY(AM), Raleigh, North Carolina, Facility ID No. 51262 ("WCLY"), and WDNC-AM, LLC would become the licensee of WDNC(AM), Durham, North Carolina, Facility ID No. 17762 ("WDNC").

WCLY-AM, LLC and WDNC-AM, LLC are wholly-owned subsidiaries of WRAL-FM, Inc., which is in turn a wholly-owned subsidiary of Capitol Broadcasting Company, Inc. ("CBC"). As demonstrated below, the proposed assignment of the licenses for WCLY and WDNC complies with the Commission's multiple ownership rules, 47 C.F.R. § 73.3555.

I. Local Radio Ownership Analysis

The Commission's local radio ownership rule is set forth in Section 73.3555(a) of the Rules. This rule provides that, in a market with 45 or more full-power commercial and non-commercial radio stations, a party may hold a cognizable interest in up to 8 radio stations, no more than 5 of which may be in the same service (AM or FM).

The attached BIA Market Report for the Raleigh-Durham, North Carolina Arbitron Metro market (the "Raleigh Market") indicates that there are 46 full-power radio stations operating in the Raleigh Market.¹ As noted in the BIA Market Report, WCLY and WDNC are assigned to the Raleigh Market. Thus, no geographic contour overlap analysis is required.

CBC currently has a cognizable interest in 2 full power FM stations in the Raleigh Market: WRAL(FM), Raleigh, North Carolina (Facility ID No. 73920); and WCMC-FM, Creedmoor, North Carolina (Facility ID No. 51760).² Under the proposed transaction, upon consummation CBC would obtain a cognizable interest in 2 AM stations, for a total of 2 FM and 2 AM stations in the Raleigh Market. In addition, for a brief period, CBC would have a cognizable interest in a third AM station in the market, WRBZ(AM), Raleigh, North Carolina, pursuant to a Time Brokerage Agreement, a copy of which is being timely filed with the Commission.³ CBC would thus at all times be well within the local radio ownership limits set forth in Section 73.3555(a), with cognizable interests in no more than 2 FM and 3 AM stations in the Raleigh Market.

¹ Radio station WGSB(AM) is listed as "Dark" and thus has not been counted.

² CBC also holds a cognizable interest in an unbuilt construction permit for WNCM(FM), Sharpsburg, North Carolina, Facility ID No. 170946 ("WNCM"). According to BIA, WNCM will, once licensed, be assigned to the Rocky Mount, North Carolina Arbitron market and thus is not germane to this analysis. In any event, CBC would be in compliance with the local radio ownership rule even if WNCM were deemed to be included in the Raleigh Market.

³ The Time Brokerage Agreement for WRBZ(AM) will expire no later than November 30, 2009.

II. Broadcast Cross-Ownership Analysis

Section 73.3555(c) of the FCC's Rules sets forth the radio-television cross-ownership rule. This rule is triggered when the predicted or measured 2 mV/m groundwave contour of the subject AM station encompasses the entire community of license of a commonly owned television station. Assignee has assumed for purposes of this multiple ownership analysis that the rule is implicated with respect to both WCLY and WDNC.

Pursuant to Section 73.3555(c)(2)(i)(A), an entity may own up to 2 television stations (if permitted under Section 73.3555(b)) and 6 commercial radio stations (if permitted under Section 73.3555(a)) in the same market if at least 20 independently owned media voices would remain in the market post-merger.

CBC lawfully holds a cognizable interest in 2 commercial television stations in the Raleigh-Durham Designated Market Area ("DMA"): WRAL-TV, Raleigh, North Carolina, Facility ID No. 8688; and WRAZ-TV, Raleigh, North Carolina, Facility ID No. 64611. In addition, under the proposed transaction CBC would hold a cognizable interest in no more than 5 commercial radio stations. The proposed transaction is fully compliant with Section 73.3555(c)(2)(i)(A) because more than 20 independently owned media voices will remain in the Raleigh market if the proposed transaction is consummated. Specifically, the following independently owned media voices will remain in the Raleigh market:

Independently Owned Television Stations,⁴
Radio Stations,⁵ Newspapers⁶ and Cable Systems⁷
Located in the Raleigh-Durham, NC Market

- | | |
|---------------------------------------|--|
| 1. ABC/Disney | WTVD(TV) |
| 2. Capitol Broadcasting Company, Inc. | WRAL-TV, WRAZ(TV), WRAL(FM), WCMC-FM, WDNC(AM)*, WCLY(AM)* |
| 3. Media General | WNCN(TV) |
| 4. Sinclair Broadcast Group | WLFL(TV), WRDC(TV) |
| 5. Multicultural Capital Trust | WRAY-TV |
| 6. Univision | WUVC-TV |
| 7. ION Media Networks | WRPX(TV), WFPX(TV) |
| 8. North Carolina university system | WUNC-TV, WUNP-TV, WUNC(FM), WKNC-FM, WNCU(FM) |

[continued]

⁴ Included are TV stations located and operating within the Raleigh-Durham, NC DMA.

⁵ Included are radio stations in the Raleigh Market.

⁶ Included are daily English language newspapers that are published at least 4 days a week and that have a circulation exceeding 5% of the households in the market.

⁷ Included is one cable service.

9. Radio One Inc.	WFXK(FM), WNNL(FM), WFXC(FM), WQOK(FM)
10. Lamm Media Group LLC	WTSB(AM)
11. Vilkom Interactive Media LLC	WCHL(AM)
12. Clear Channel Communications Inc.	WDCG(FM), WRVA(FM), WRDU(FM), WKSL(FM)
13. Curtis Media Group	WPTF(AM), WQDR(FM), WKIX(FM), WYRN(AM), ⁸ WBBB(FM), WDOX(AM), WKXU(FM), WYMY(FM), WRBZ(AM) ⁹
15. Estuardo Rodriguez	WGSB(AM), WRTG(AM), WLLQ(AM)
16. Fellowship Baptist Church Inc.	WHPY(AM)
17. Family Media Group LLC	WMPM(AM)
18. Chatham Broadcasting Co. Inc.	WNCA(AM)
19. WPJL Inc.	WPJL(AM)
20. Benson Broadcasting Inc.	WPYB(AM)
21. Davidson Media Group LLC	WRJD(AM), WTIK(AM)
22. Truth Broadcasting Corporation	WDRU(AM)
23. St. Augustine's College	WAUG(AM)
24. Calvary Chapel of Costa Mesa	WAJC(FM)
25. Educational Information Corporation	WCPE-FM
26. Shaw University	WSHA(FM)
27. Duke University	WXDU(FM)
28. Student Educational Broadcasting Inc.	WXYC(FM)
29. The News & Observer Publishing Co.	<i>The News & Observer</i> (7-days/week daily newspaper)
30. Fayetteville Publishing Company	<i>The Fayetteville Observer</i> (7-days/week daily newspaper)
31. Time Warner Cable	Time Warner Cable
32. McClatchey Broadcasting Company LLC	WWMY(AM) ¹⁰
33. Prieto Broadcasting Inc.	WDUR(AM), WETC(AM)
34. Radio Training Network, Inc.	WRTP(FM)

Accordingly, the proposed transaction fully complies with the Commission's local radio ownership and broadcast cross-ownership rules.

⁸ An application is pending to assign this station to Johnson Broadcast Ventures Ltd. (File No. BAL-20090723ADN, accepted for filing July 31, 2009).

⁹ See Footnote 10.

¹⁰ As part of a related transaction, the license for WRBZ(AM) would be assigned to Curtis Media Group, but McClatchey Broadcasting Company LLC (or one of its licensee subsidiaries) would become the licensee of WWMY(AM) and thus continue to be an independent voice in the market.

* Subject to Commission consent and consummation of the instant transaction.