

**Exhibit 15**

**COMPLIANCE WITH OWNERSHIP RULES**

Santa Barbara Broadcasting, Inc. (the "Assignee") seeks to purchase station KZBN(AM), Santa Barbara, California, from Rotijefco, Inc. (the "Assignor," together the "Applicants"). Neither the Assignor nor the Assignee has an attributable interest in any other radio or television station anywhere in the United States. Santa Barbara is both the city of license for KZBN(AM) and the station's "home" Metro according to Arbitron.

Each of the Applicants complies with Section 73.3555 of the Commission's rules (47 C.F.R. 73.3555).