

**AMENDMENT TO MULTIPLE OWNERSHIP SHOWING:
COMPLIANCE WITH RADIO-TELEVISION CROSS-OWNERSHIP RULE**

In the local radio Multiple Ownership Showing attached to the original Form 301, the Applicant demonstrated that the change in class of KZJK(FM) from C1 to C0 would fully comply with the FCC's local radio ownership rule (47 C.F.R. Section 73.3555(a)). The purpose of this Amendment is to demonstrate that the proposed change in class of KZJK(FM) would also fully comply with the radio-television cross-ownership rule.

In its 2002 Biennial Regulatory Review Report and Order, *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 (2003), the Commission concluded that the radio-television cross-ownership rule no longer served the public interest and repealed the rule. *Id.* at 13768. However, the Third Circuit's stay of the effective date of the FCC's multiple ownership rules imposed in 2003 remains in effect as to the repeal of the radio-television cross-ownership rule. *See Prometheus Radio Project v. FCC*, 373 F.3d 372, 435 (3d Cir. 2004) (denying motion to lift stay of the radio-television cross-ownership rule). The Applicant thus remains subject to the radio-television cross-ownership rule.

The radio-television cross-ownership rule is triggered when either (i) the Grade A contour of a television station encompasses the community of license of a commonly owned radio station, or (ii) when the 1 mV/m contour of an FM station or the 2 mV/m contour of an AM station encompasses the community of license of a commonly owned television station. The proposed change in class of KZJK(FM) triggers the rule because the licensed and proposed 1 mV/m contour of the station entirely encompasses the city of Minneapolis, Minnesota, which is the community of license of WCCO-TV (Facility ID No. 9629). CBS Broadcasting Inc., which is owned by the same parent company as the Applicant, is the licensee of WCCO-TV.

Although the radio-television cross-ownership rule is triggered by contour encompassment, the Commission determines compliance with the rule on an Arbitron Metro basis. WCCO-TV is located in the Minneapolis-St. Paul Arbitron Metro.

Under the radio-television cross-ownership rule, an entity may control up to two commercial television stations and six commercial radio stations (to the extent permitted by the local radio multiple ownership rule) or one commercial television station and seven commercial radio stations (to the extent that an entity would be permitted to own two commercial television stations and six commercial radio stations) in a market if at least 20 independently owned and operated media voices would remain in the market

post-acquisition. See 47 C.F.R. § 73.3555(c)(2)(ii) (2002). As discussed in the local radio Multiple Ownership Showing attached to the original Form 301, the Applicant and its related entity's control of three radio stations in the Minneapolis-St. Paul radio market (KZJK(FM), WCCO(AM), and WLTE(FM)) complies with the local radio multiple ownership rule.

As the charts below indicate, there will be more than 20 independently owned and operated media voices in the market following the change in class of KZJK(FM) from C1 to C0. As a result, the Applicant may have an attributable interest in one commercial television station and three commercial radio stations in the market consistent with the radio-television cross-ownership rule. The cross ownership implications for KZJK(FM) would remain constant both before and after the proposed change in class.

Independently Owned and Operated Media Voices Post-Proposed Change in Class Will Include:

Radio Voices

Voices	Parent	Calls
1	Board of Education, Special School District No. 1	KBEM-FM
2	Board of Regents, University of Wisconsin System	WRFW(FM)
3	Borgen, Gregory Borgen, Gregory	WDGY(AM) WMIN(AM)
4	Broadcast One, Inc.	KQSP(AM)
5	CBS Corporation CBS Corporation CBS Corporation	KZJK(FM) WCCO(AM) WLTE(FM)
6	Center for Communication & Development	KMOJ(FM)
7	Central Baptist Seminary	WCTS(AM)
8	Citadel Broadcasting Corporation Citadel Broadcasting Corporation Citadel Broadcasting Corporation Citadel Broadcasting Corporation Citadel Broadcasting Corporation	KQRS-FM WGVY(FM) KXXR(FM) WGVZ(FM) WGVX(FM)
9	Clear Channel Communications * Clear Channel Communications *	KTLK-FM KDWB-FM KEEY-FM KQQL(FM) KFXN(AM) KTCZ-FM KFAN(AM)
10	Davidson Media Group, LLC Davidson Media Group, LLC	KMNV(AM) KRJJ(AM)
11	Donnell Incorporated	KRWC(AM)
12	Educational Media Foundation	KMKL(FM)
13	Endurance Broadcasting, LLC	KLBB(AM)
14	Fresh Air, Inc.	KFAI(FM)
15	Hanten Broadcasting Co. Inc. Hanten Broadcasting Co. Inc.	WEVR(AM) WEVR-FM

16	Hubbard Broadcasting, Inc. Hubbard Broadcasting, Inc. Hubbard Broadcasting, Inc. Hubbard Broadcasting, Inc.	KSTP(AM) KSTP-FM WIXK(AM) WFMP(FM)
17	JR Broadcasting LLC	KTNF(AM)
18	K & M Broadcasting, Inc.	KDWA(AM)
19	Minnesota Public Radio Minnesota Public Radio	KSJN(FM) KNOW-FM
20	Northwestern College Radio Network Northwestern College Radio Network	KTIS(AM) KTIS-FM
21	Peters, Daniel	WLKX-FM
22	Radio One, Inc.	KTTB-FM
23	Salem Communications Corporation Salem Communications Corporation Salem Communications Corporation	KKMS(AM) KYCR(AM) WWTC(AM)
24	Selby Gospel Broadcasting Corporation	KNOF(FM)
25	Self Retire, Inc.	KZGX(AM)
26	Starboard Media Foundation, Inc.	WLOL(AM)
27	StarCom, LLC	KLCI(FM)
28	The Walt Disney Company	KDIZ(AM)
29	University of Minnesota	KUOM(AM)

Total Radio Voices - 29

* The application to transfer KTLK-FM, KDWB-FM, KEEY-FM, KQQL(FM), KFXN(AM), KTCZ-FM, and KFAN(AM) to BT Triple Crown Merger Co., Inc. is pending.
See BTCH-20061212BYE.

Television Voices

Voices	Parent	Calls
--	CBS Corporation **	WCCO-TV
1	Gannett Company, Inc.	KARE
--	Hubbard Broadcasting, Inc. ** Hubbard Broadcasting, Inc. **	KSTC-TV KSTP-TV
2	Ion Media Networks, Inc.	KPXM
3	News Corporation News Corporation	KMSP-TV WFTC
4	Sinclair Broadcast Group Inc	WUCW
5	Twin Cities Public Television, Inc Twin Cities Public Television, Inc	KTCA-TV KTCI-TV

Total Television Voices - 5

** Owner previously counted as a radio voice.