

UNRESOLVED CHARACTER ISSUES

Pamplin Broadcasting-Washington, Inc. ("PBW") discloses the following unresolved, alleged character issues related to PBW and Pamplin Broadcasting, Inc. ("PBI"). PBW and PBI are both 100% wholly-owned subsidiaries of Pamplin Communications Corporation, a party to this application.

PBW filed two applications in which opponents have raised meritless character issues. The first is PBW's application for a new AM station at Union Gap, Washington. See FCC File No. BNP-20031205AJB. On February 9, 2004, New Northwest Broadcasters LLC ("NNB") filed an informal objection alleging that PBW lacked reasonable assurance of site availability for the Union Gap application. PBW filed a response to the informal objection on September 2, 2004, explaining that NNB's allegation was incorrect. PBW had reasonable assurance of site availability at the time PBW filed its application, as the Commission's rules require. That is because, before PBW filed the application, a representative of NNB, the site owner, informed PBW that NNB was favorably disposed to allowing PBW to diplex its facilities at the site.

The second is PBW's application to construct a new AM station at Redmond, Washington. See File No. BNP-20010212ABT. On March 4, 2004, Entercom Seattle License, LLC, Butterfield Broadcasting Corporation, and Rose City Radio Corporation ("Petitioners") filed petitions to deny the application. Among other things, the Petitioners criticized PBW's engineering, made allegations about PBW's proposed site and alleged that PBW's station would interfere with other stations. PBW responded to these petitions on July 30, 2004. PBW challenged the Petitioners' allegations about interference issues and argued that the Petitioners' concerns about engineering issues were moot, because PBW planned to file new engineering. PBW also noted that it held an option to purchase the site where the proposed towers were to be located that was signed by the property owner, thereby meeting the requirement to have reasonable assurance of site availability. PBW's purchase option expired on October 8, 2004, and was not renewed. PBW located a new transmitter site, as allowed by Commission rules. PBW submitted revised engineering for the new transmitter site on May 25, 2006. Pamplin is now preparing an environmental assessment for that site, which Pamplin will file with the Commission once it is complete.

PBI filed an application for a construction permit for a new AM station at Reno, Nevada, which the Audio Division granted on September 3, 2003. See File No. BNP-20001020AAZ. On October 9, 2003, Americom Las Vegas Limited Partnership, Owens One Company, Inc. and KGO-AM Radio, Inc. ("Opponents") filed pleadings opposing the Audio Division's grant of PBI's application. The Opponents raised meritless character issues regarding PBI. Among other things, the Opponents alleged that PBI lacked reasonable site assurance when it filed its application, that PBI's proposed station would interfere with other stations, and that PBI's application violated the FCC's nighttime coverage rule. PBI filed a response to these arguments on November 3, 2003, rebutting these charges. PBI noted that the Audio Division Staff already determined that PBI's application would cause no interference and would not violate the nighttime coverage rule. PBI also stated that it had reasonable site assurance when it filed its application, because PBI had entered into a lease to diplex the station with a party that warranted its ownership of the site. The Commission issued an order on January 17, 2008 rejecting the Opponent's objections. That order will become a final order once the appeal period has passed, thereby resolving the alleged character issue.

The Audio Division and the Commission have not yet resolved the issues discussed above, with the exception of the Reno construction permit. PBW's responses in this exhibit show that these issues do not justify denying this application.