

EXHIBIT 16
MULTIPLE OWNERSHIP

The following applications on FCC Form 314 (together, the “Applications”) involving SLC Divestiture Trust I (“SLC I”) are being submitted to the Commission concurrently:

1. Application on FCC Form 314 for the assignments of the licenses of stations KDWY(FM), KJQN(FM) and KZNS(AM) from Simmons-SLC, LS, LLC to SLC I.
2. Application on FCC Form 314 for the assignments of the licenses of stations KAUU(FM) and KUDE(FM) from Millcreek Broadcasting, LLC, Debtor-in-Possession to SLC I.
3. Application on FCC Form 314 for the assignment of the license of station KZZQ(FM) from 3 Point Media – Franklin, LLC, Debtor-in-Possession to SLC I.

Upon consummation of the transactions contemplated in the Applications, SLC I will be the licensee of the following radio stations (the “Stations”):

Call Sign	Service	Fac. ID No.	Community of License
KDWY	FM	77947	Diamondville, WY
KJQN	FM	88483	Coalville, UT
KZNS	AM	60458	Salt Lake City, UT
KAUU	FM	59034	Manti, UT
KUDE	FM	72769	Nephi, UT
KZZQ	FM	87974	Coalville, UT

Five of the Stations are located in the Salt Lake City, UT area, where there is an Arbitron Metro (the “SLC Metro”). KDWY(FM) is located in southwestern Wyoming, outside of any Arbitron Metro. No party to this application has an attributable interest in any other radio station that is located in the same market as, or has contour overlap with, any of the Stations. Because some of the Stations are not home to the SLC Metro and/or are licensed to communities that are geographically located outside of the SLC Metro (and all other Arbitron Metros), both an analysis based on a count of stations in the SLC Metro and an analysis under the FCC’s interim contour overlap methodology are required in order to demonstrate compliance with the FCC’s multiple ownership rules.

Arbitron Metro Analysis: The following five Stations (the “SLC Stations”) – 1 AM and 4 FM – are home to the SLC Metro and/or licensed to a community located within the SLC Metro:

Call Sign	Service	Fac. ID No.	Community of License
KJQN	FM	88483	Coalville, UT
KZNS	AM	60458	Salt Lake City, UT

Call Sign	Service	Fac. ID No.	Community of License
KAUU	FM	59034	Manti, UT
KUDE	FM	72769	Nephi, UT
KZZQ	FM	87974	Coalville, UT

According to BIA, there are 65 radio stations in the SLC Metro. In a market of this size, a single entity is permitted to have an attributable interest in not more than 8 radio stations in total and not more than 5 radio stations in one service (AM or FM).¹ Common ownership of the SLC Stations complies with these limitations.²

Contour Overlap Analysis: Please see the attached contour overlap study of Charles Cooper, confirming compliance with the Commission's multiple ownership rules.

¹ See *id* at § 73.3555(1)(1)(i).

² KDWY(FM) has a pending application for a construction permit to move from Diamondville, WY to Oakley, UT. See FCC File No. BPH-20080328AAN. However, the station currently is neither home to the SLC Metro nor licensed to a community located within the SLC Metro. Moreover, Oakley, UT is located outside of any Arbitron Metro. Accordingly, this move will have no impact on the Arbitron Metro analysis. Similarly, KAUU(FM) has a pending application for a construction permit to move from Manti, UT to American Fork, UT. See FCC File No. BPH-20080325AID. The proposed community of license, unlike the station's current community of license, is located within the SLC Metro. However, because the station is already home to the SLC Metro, this move will have no impact on the Arbitron Metro analysis.

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
DIVESTITURE TRUST #1

This radio multiple ownership analysis was prepared to consider common ownership of the stations tabulated below under the FCC “Interim” contour analysis method.^{*} Divestiture Trust #1 is the proposed licensee of the below tabulated radio stations. An interim radio ownership analysis of these stations has been completed.

Call Sign / Facility ID	Location	Facilities
KZNS(AM)/60458 Licensed Facility	Salt Lake City, UT	1280 kHz 50 kW-D 0.67 kW-N DA-2
KAUU(FM)/59034 Licensed Facility	Manti, UT	Channel 286C 48 kW 684 M
KAUU(FM)/59034 Proposed Facility	American Fork, UT	Channel 286C 15 kW 1243 M
KDWY(FM)/77947 Licensed Facility	Diamondville, WY	Channel 287C2 16 kW 270 M
KDWY(FM)/77947 Proposed Facility	Oakley, UT	Channel 288C 89 kW 647 M
KJQN(FM)/88483 Licensed Facility	Coalville, UT	Channel 276C 89 kW 647 M
KUDE(FM)/72769 Licensed Facility	Nephi, UT	Channel 280C 74 kW 684 M
KZZQ(FM)/87974 Licensed Facility	Coalville, UT	Channel 248C 89 kW 647 M

The principal community contours of these stations are depicted on a map included herein as Figure 1. Since the principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) of some of the stations are involved in mutual overlap, an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

^{*} See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

Radio Markets

The “radio markets” applicable to common ownership of the subject stations are defined as the areas encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. The table below lists the defined markets:

Defined Radio Market	Stations that Define Radio Market	
	AM Station(s)	FM Stations
Market 1	KZNS	KZZQ/KJQN/KDWY(APP)/KAUU(APP)
Market 2	KZNS	KAUU (APP & CP)/KUDE
Market 3	KZNS	KZZQ/KJQN/KDWY(APP)/KUDE/KAUU(APP)

Count of Stations in the Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations having principal community contours which overlap or intersect the principal community contours which define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations were not considered in the count of stations in the defined markets. The results of the analysis are tabulated below:

Defined Radio Markets	Minimum Number of Other Stations in the Radio Market
Markets 1, 2 & 3	23 AM, 33 FM; 56 Total

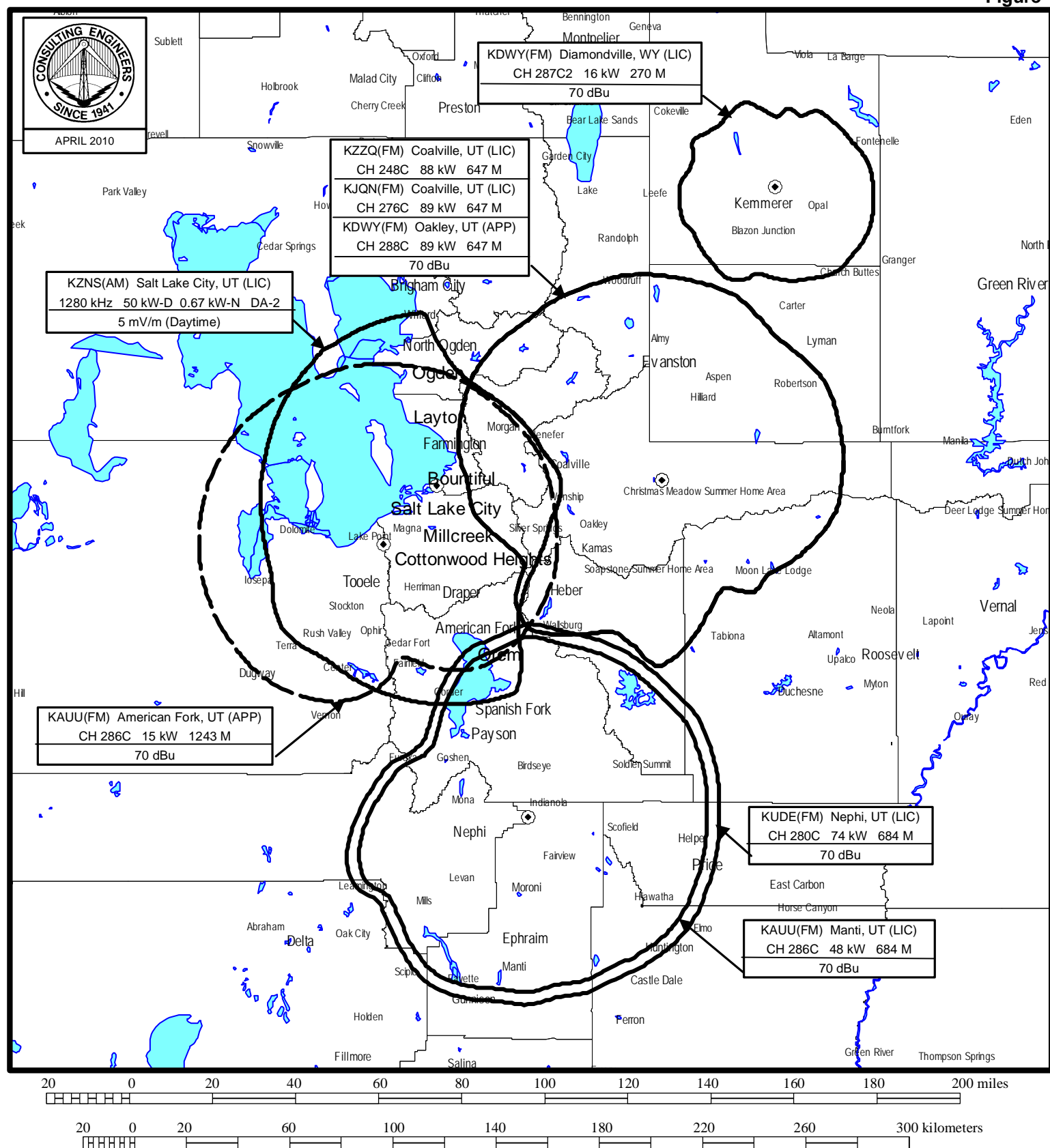
Figure 2 are tabulations of the radio stations identified in the defined radio market. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 30 second computer database for each of the FM stations using radials evenly-spaced every 10 degrees of azimuth.

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Figure 1



RADIO MULTIPLE-OWNERSHIP SUBJECT STATIONS

DIVESTITURE TRUST #1

du Treil, Lundin & Rackley, Inc Sarasota, Florida

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
DIVESTITURE TRUST #1

Tabulation of Other Stations Defined in the Radio Market #1, #2 & #3

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Channel</u>
KACP	Salt Lake City	UT	570
KTKK	Sandy	UT	630
KALL	North Salt Lake City	UT	700
KSVN	Ogden	UT	730
KUTR	Taylorsville	UT	820
KKAT	Salt Lake City	UT	860
KWDZ	Salt Lake City	UT	910
KIHU	Tooele	UT	1010
KDYL	South Salt Lake	UT	1060
KANN	Roy	UT	1120
KSL	Salt Lake City	UT	1160
KJQS	Murray	UT	1230
KFNZ	Salt Lake City	UT	1320
KTMP	Heber City	UT	1340
KSOP	South Salt Lake	UT	1370
KSRR	Provo	UT	1400
KLO	Ogden	UT	1430
KEYY	Provo	UT	1450
KHQN	Spanish Fork	UT	1480
KOGN	Ogden	UT	1490
KLLB	West Jordan	UT	1510
KMRI	West Valley City	UT	1550
KTUB	Centerville	UT	1600
KPGR	Pleasant Grove	UT	88.1
KWCR-FM	Ogden	UT	88.1
KCPW-FM	Salt Lake City	UT	88.3
KBYU-FM	Provo	UT	89.1
KUER-FM	Salt Lake City	UT	90.1
KRCL	Salt Lake City	UT	90.9
KUFR	Salt Lake City	UT	91.7
KOHS	Orem	UT	91.7
KPCW	Park City	UT	91.9
KTCE	Payson	UT	92.1
KUUU	South Jordan	UT	92.5
KUBL-F	Salt Lake City	UT	93.3
KODJ	Salt Lake City	UT	94.1
KHTB	Provo	UT	94.9
KMGR	Delta	UT	95.9
KZHT	Salt Lake City	UT	97.1
KBZN	Ogden	UT	97.9
KBEE	Salt Lake City	UT	98.7
KJMY	Bountiful	UT	99.5
KSFI	Salt Lake City	UT	100.3
KBER	Ogden	UT	101.1
KENZ	Ogden	UT	101.9
KDUT	Randolph	UT	102.3
KSL-FM	Midvale	UT	102.7

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Channel</u>
KRSP-FM	Salt Lake City	UT	103.5
KUDE	Nephi	UT	103.9
KSOP-FM	Salt Lake City	UT	104.3
KYLZ	Lyman	WY	104.7
KAUU	Manti	UT	105.1
KNRS-FM	Centerville	UT	105.7
KBMG	Evanston	WY	106.1
KOSY-FM	Spanish Fork	UT	106.5
KKAT-FM	Orem	UT	107.5