

MULTIPLE OWNERSHIP

EXHIBIT 15

This exhibit is being submitted to demonstrate that the acquisition proposed in the instant application complies with the local radio ownership limits.

In this application, Malkan AM Associates, L.P., as assignee, proposes to acquire the license of Station KEYS(AM), Corpus Christi, Texas.

According to the Commission's local ownership "tiers," in a Metro reported by BIA as having between 30 and 44 (inclusive) "home" commercial and noncommercial educational full-power radio stations, a party may have a cognizable interest in up to 7 commercial full-power radio stations, not more than 4 of which are in the same service (AM or FM). In the Corpus Christi, Texas Arbitron Metro there are 34 commercial and noncommercial educational full-power radio stations. This application complies with the local radio ownership portion of the multiple ownership rules set forth in 47 C.F.R. Section 73.3555 because only three full-power radio stations (KEYS(AM), KZFM(FM), and KKBA(FM)) are attributable to Malkan AM Associates, L.P. and any party to this application.

In addition, the principal community contour of Station KEYS(AM) does not overlap the principal community contour of any full-power commercial or non-commercial radio station that (i) is not located within or "home" to the Corpus Christi, Texas Arbitron Metro and (ii) is attributable to Malkan AM Associates, L.P. or any party to this application.



FCC Geographic Market Definition for Corpus Christi, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Home Mkt		Owner	City & State of License	County of License
						Rank	135			
KBNJ	FM	91.7	NC	ChrsContem	Corpus Christi, TX	135		World Radio Network Inc	Corpus Christi, TX	Nueces
KBSO	FM	94.7	C	Americana	Corpus Christi, TX	135		Davila, Manuel	Corpus Christi, TX	Nueces
KCCT	AM	1150	C	ChrsContem	Corpus Christi, TX	135		Davila, Manuel	Corpus Christi, TX	Nueces
KCTA	AM	1030	C	Christian	Corpus Christi, TX	135		Broadcasting Corporation of the Southwest	Corpus Christi, TX	Nueces
KDAE	AM	1590	C	Span/Relgn	Corpus Christi, TX	135		The Worship Center of Kingsville	Sinton, TX	San Patricio
KEDT	FM	90.3	NC	Variety	Corpus Christi, TX	135		South Texas Public Bcstg. Systems Inc.	Corpus Christi, TX	Nueces
KEYS	AM	1440	C	Nws/Tlk/Spt	Corpus Christi, TX	135		Malkan Broadcast Association	Corpus Christi, TX	Nueces
KFLZ	FM	106.9	C	Modern	Corpus Christi, TX	135		p Benavides, Gerald G.	Bishop, TX	Nueces
KFTX	FM	97.5	C	Country	Corpus Christi, TX	135		Dobson, Tom & Grace	Kingsville, TX	Nueces
KINE	AM	1330	C	Span/Chrst	Corpus Christi, TX	135		Cotton Broadcasting	Kingsville, TX	Kleberg
KKBA	FM	92.7	C	AC	Corpus Christi, TX	135		Malkan Broadcast Association	Kingsville, TX	Kleberg
KKLM	FM	88.7	NC	ChrsContem	Corpus Christi, TX	135		Educational Media Foundation	Kingsville, TX	Kleberg
KKPN	FM	102.3	C	Modern AC	Corpus Christi, TX	135		Convergent Broadcasting LLC	Corpus Christi, TX	Nueces
KKTX	AM	1360	C	News/Talk	Corpus Christi, TX	135		Clear Channel Communications	Rockport, TX	Aransas
KLHB	FM	98.3	C	Tejano	Corpus Christi, TX	135		p Tejas Broadcasting LLP	Corpus Christi, TX	Nueces
KLTG	FM	96.5	C	Hot AC	Corpus Christi, TX	135		p Tejas Broadcasting LLP	Corpus Christi, TX	Nueces
KLUX	FM	89.5	NC	Easy	Corpus Christi, TX	135		Diocesan Telecommunications Corp	Robstown, TX	Nueces
KMIQ	FM	104.9	C	Tejano	Corpus Christi, TX	135		Cotton Broadcasting	Robstown, TX	Nueces
KMJR	FM	105.5	C	Mexican	Corpus Christi, TX	135		p Tejas Broadcasting LLP	Portland, TX	San Patricio
KMXR	FM	93.9	C	Oldies	Corpus Christi, TX	135		Clear Channel Communications	Corpus Christi, TX	Nueces
KNCN	FM	101.3	C	AOR	Corpus Christi, TX	135		Guerra Enterprises	Sinton, TX	Nueces
KNDA	FM	102.9	C	HpHop/Top4	Corpus Christi, TX	135		p Tejas Broadcasting LLP	Alice, TX	San Patricio
KOUL	FM	103.7	C	Country	Corpus Christi, TX	135		Convergent Broadcasting LLC	Sinton, TX	San Patricio
KPUS	FM	104.5	C	Clisc Rock	Corpus Christi, TX	135		B Communications Joint Venture	Gregory, TX	San Patricio
KROB	AM	1510	C	Religion	Corpus Christi, TX	135		Convergent Broadcasting LLC	Robstown, TX	Nueces
KRPX	FM	107.3	C	Rock	Corpus Christi, TX	135		Convergent Broadcasting LLC	Ingleside, TX	Nueces
KRYS	FM	99.1	C	Country	Corpus Christi, TX	135		Clear Channel Communications	Corpus Christi, TX	Nueces
KSAB	FM	99.9	C	Span/Tejano	Corpus Christi, TX	135		Clear Channel Communications	Robstown, TX	Nueces
KSGR	FM	91.1	NC	Religion	Corpus Christi, TX	135		CSN International	Portland, TX	Nueces
KSIX	AM	1230	C	Sports	Corpus Christi, TX	135		Withers Family LP	Portland, TX	San Patricio
KTKY	FM	106.5	C	DARK	Corpus Christi, TX	135		p Convergent Broadcasting LLC	Corpus Christi, TX	Nueces
KLUNO	AM	1400	C	Span/Mexcn	Corpus Christi, TX	135		Clear Channel Communications	Taft, TX	San Patricio

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Corpus Christi, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Home		City & State of License	County of License
						Rank	Owner		
KXTM	FM	107.7	C	Mexcn/Tejro	Corpus Christi, TX	135	Lopez, Humberto	Benavides, TX	Nueces
KZFM	FM	95.5	C	CHR	Corpus Christi, TX	135	Malkan Broadcast Association	Corpus Christi, TX	Nueces

Number of Stations in Geographic Market 34

"C" - Commercial Station; "NC" - Non Commercial Station

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"p" indicates pending sale to owner listed

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