

COMPLIANCE WITH MULTIPLE OWNERSHIP RULES

Point Four, LLC (“Gold Coast”), the licensee of KOCP(FM), Oxnard, California, hereby demonstrates that the instant modification application fully complies with the Commission’s multiple ownership regulations.¹

KOCP(FM) is “home” to the Nielsen Oxnard-Ventura radio market. Point Four is the licensee of two additional FM radio stations and three AM radio stations in the Nielsen Oxnard-Ventura radio market: KFYV(FM), Ojai, California; KCAQ(FM), Camarillo, California; KKZZ(AM), Port Hueneme, California; KVTA(AM), Ventura, California; and KUNX(AM), Santa Paula, California. Point Four has no attributable ownership interest, whether by ownership, LMA, or JSA in any other station in the Oxnard-Ventura market.

The most recent available Nielsen data for the Oxnard-Ventura radio market reveals that there are 20 commercial and noncommercial radio stations in the market. *See* the BIA FCC Geographic Market Definition for Oxnard-Ventura, attached hereto. Under the broadcast multiple ownership rules, in a radio market with between 15 and 29 commercial and noncommercial radio stations, an entity may lawfully own, operate, and control up to six radio stations, only four of which may be in one class. Accordingly, Point Four’s continued ownership of three FM stations and three AM stations in the market is fully compliant with the multiple ownership rules.²

¹ See 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 et al., Report and Order and Notice of Proposed Rulemaking, FCC 03-127, aff'd in part and remanded in part, Prometheus Radio Project, et al. v. FCC, 373 F.3d 372 (3rd Cir. 2004), stay modified, No. 03-3388 (Sept. 3, 2004) ("Report and Order").

² Under the Commission's multiple ownership rules, a modified contour overlap analysis is also required if any station subject to the application does not have its community of license located within the geographic boundaries of any Nielsen Metro. *See Report and Order* at 286. KOCP is assigned to the Oxnard-Ventura Nielsen metro and Oxnard, KOCP's community of license, is physically located in the Oxnard-Ventura Nielsen metro market, which encompasses Ventura County. Accordingly, a modified contour overlap analysis is not required.

FCC Geographic Market Definition for Oxnard-Ventura, CA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KBBY	FM	95.1	C	Hot AC	Oxnard-Ventura, CA	07/02/2003	121	Cumulus Media Holdings Inc	Ventura, CA	Ventura
KCAQ	FM	95.9	C	Urban CHR	Oxnard-Ventura, CA	07/02/2003	121	Point Broadcasting Company	Camarillo, CA	Ventura
KCRU	FM	89.1	NC	Nws/Tlk/Var	Oxnard-Ventura, CA	07/02/2003	121	Santa Monica Comm College	Oxnard, CA	Ventura
KDAR	FM	98.3	C	Chrst/Talk	Oxnard-Ventura, CA	07/02/2003	121	Salem Media Group Inc	Oxnard, CA	Ventura
KFYV	FM	105.5	C	CHR	Oxnard-Ventura, CA	07/02/2003	121	Point Broadcasting Company	Ojai, CA	Ventura
KHAY	FM	100.7	C	Country	Oxnard-Ventura, CA	07/02/2003	121	Cumulus Media Holdings Inc	Ventura, CA	Ventura
KJAI	FM	89.5	NC	Nws/Tlk/Inf	Oxnard-Ventura, CA	07/02/2003	121	American Public Media Group	Ojai, CA	Ventura
KKZZ	AM	1520	C	Span/Talk	Oxnard-Ventura, CA	07/02/2003	121	Point Broadcasting Company	Port Hueneme, CA	Ventura
KLJR	FM	96.7	C	Span/AdHts	Oxnard-Ventura, CA	07/02/2003	121	Lazer Broadcasting Corporation	Santa Paula, CA	Ventura
KMLA	FM	103.7	C	Mexican	Oxnard-Ventura, CA	07/02/2003	121	Gold Coast Radio LLC	El Rio, CA	Ventura
KMRO	FM	90.3	NC	Span/Chrst	Oxnard-Ventura, CA	07/02/2003	121	Association for Community Education	Camarillo, CA	Ventura
KOCP	FM	104.7	C	Rhymc/Olde	Oxnard-Ventura, CA	07/02/2003	121	Point Broadcasting Company	Oxnard, CA	Ventura
KOXR	AM	910	C	Mexican	Oxnard-Ventura, CA	07/02/2003	121	Lazer Broadcasting Corporation	Oxnard, CA	Ventura
KRUZ	FM	103.3	C	Clsc Hits	Oxnard-Ventura, CA	07/27/2005	121	Cumulus Media Holdings Inc	Santa Barbara, CA	Santa Barbara
KSSC	FM	107.1	C	Grupr/Cmbi	Oxnard-Ventura, CA	03/30/2017	121	Entravision Communications Corp	Ventura, CA	Ventura
KUNX	AM	1400	C	Mexican	Oxnard-Ventura, CA	07/02/2003	121	Point Broadcasting Company	Santa Paula, CA	Ventura
KVEN	AM	1450	C	Sports	Oxnard-Ventura, CA	07/02/2003	121	Cumulus Media Holdings Inc	Ventura, CA	Ventura
KVTA	AM	1590	C	Talk/News	Oxnard-Ventura, CA	07/02/2003	121	Point Broadcasting Company	Ventura, CA	Ventura
KVYB	FM	106.3	C	Hip Hop	Oxnard-Ventura, CA	04/02/2013	121	Cumulus Media Holdings Inc	Oak View, CA	Ventura
KXLM	FM	102.9	C	Mexican	Oxnard-Ventura, CA	07/02/2003	121	Lazer Broadcasting Corporation	Oxnard, CA	Ventura

Number of Stations in Geographic Market 20

Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed