

Multiple Ownership Compliance Analysis

The parties to this application, through SummitMedia and its licensee subsidiaries listed below (collectively, “SummitMedia”),¹ have attributable interests in 5 full-power broadcast stations which are listed as “home” to the Omaha-Council Bluffs, NE-IA Market (“Omaha-Council Bluffs Market”) by BIA:

<u>Licensee</u>	<u>Station</u>	<u>Type</u>	<u>Community of License</u>	<u>State</u>	<u>Facility ID No.</u>
SM-KEZO-FM, LLC	KEZO-FM	FM	Omaha	NE	74105
SM-KKCD, LLC	KKCD	FM	Omaha	NE	74103
SM-KQCH, LLC	KQCH	FM	Omaha	NE	50314
SM-KSRZ-FM, LLC	KSRZ	FM	Omaha	NE	50308
SM-KXSP, LLC	KXSP	AM	Omaha	NE	50313

SummitMedia does not hold attributable interests in any other station in the Omaha-Council Bluffs Market.

As shown in the BIA Market Report for the Omaha-Council Bluffs Market attached hereto, the market is currently home to 31 full-power broadcast stations. Section 73.3555(a)(1)(ii) of the Commission’s rules provides that, in a radio market with between 30 and 44 full-power, commercial and noncommercial radio stations, a party may hold attributable interests in 7 full-power commercial and non-commercial broadcast stations – of which no more than 4 may be in the same service.²

SummitMedia is currently in compliance with the FCC’s multiple ownership limits for the Omaha-Council Bluffs Market because SummitMedia currently has attributable interests in only 5 full-power broadcast stations in the market – of which 4 are in the FM service, and 1 is in the AM service. Furthermore, following the closing the transaction contemplated in this application, SummitMedia will remain in compliance with the FCC’s ownership limits for the Omaha-Council Bluffs Market the stations in that market in which it has attributable interests will remain unchanged. For these reasons, SummitMedia is currently, and will remain in compliance with the FCC’s multiple ownership rules.

¹ See Changes in Ownership and Other Authorizations Exhibits.

² 47 C.F.R. § 73.3555(a)(1)(ii).

FCC Geographic Market Definition for Omaha-Council Bluffs, NE-IA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KBBX	FM	97.7	C	Mexican	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Flood Communications Limited Liability Company	Nebraska City, NE	Otoe
KCRO	AM	660	C	Chrst/Talk	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Walnut Radio LLC	Omaha, NE	Sarpy
KEZO	FM	92.3	C	Rock	Omaha-Council Bluffs, NE-IA	07/02/2003	75	SummitMedia LLC	Omaha, NE	Sarpy
KFAB	AM	1110	C	News/Talk	Omaha-Council Bluffs, NE-IA	07/02/2003	75	iHeartMedia Inc	Omaha, NE	Sarpy
KFFF	FM	93.3	C	Country	Omaha-Council Bluffs, NE-IA	07/02/2003	75	iHeartMedia Inc	Bennington, NE	Douglas
KGBI	FM	100.7	C	ChrsContem	Omaha-Council Bluffs, NE-IA	07/02/2003	75	University of Northwestern-St Paul	Omaha, NE	Sarpy
KGOR	FM	99.9	C	Clsc Hits	Omaha-Council Bluffs, NE-IA	07/02/2003	75	iHeartMedia Inc	Omaha, NE	Sarpy
KIBM	AM	1490	C	AdStd/Oldes	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Walnut Radio LLC	Omaha, NE	Sarpy
KIOS	FM	91.5	NC	News/Jazz	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Douglas County School District 001	Omaha, NE	Douglas
KISO	FM	96.1	C	Pop/CHR	Omaha-Council Bluffs, NE-IA	07/02/2003	75	iHeartMedia Inc	Omaha, NE	Sarpy
KIWR	FM	89.7	NC	Alternative	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Iowa Western Community College	Council Bluffs, IA	Pottawattamie
KKCD	FM	105.9	C	Clsc Rock	Omaha-Council Bluffs, NE-IA	07/02/2003	75	SummitMedia LLC	Omaha, NE	Sarpy
KLNG	AM	1560	C	Chrst/Talk	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Wilkins Communications Network Inc	Council Bluffs, IA	Pottawattamie
KMLV	FM	88.1	NC	ChrsContem	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Educational Media Foundation	Ralston, NE	Douglas
KMMQ	AM	1020	C	Mexican	Omaha-Council Bluffs, NE-IA	07/02/2003	75	NRG Media Limited Liability Company	Plattsmouth, NE	Cass
KOBM	AM	1420	C	AdStd/Oldes	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Walnut Radio LLC	Omaha, NE	Sarpy
KOBM	FM	97.3	C	AdStd/Oldes	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Walnut Radio LLC	Blair, NE	Washington
KOIL	AM	1290	C	News/Talk	Omaha-Council Bluffs, NE-IA	07/02/2003	75	NRG Media Limited Liability Company	Omaha, NE	Sarpy
KOOO	FM	101.9	C	Adult Hits	Omaha-Council Bluffs, NE-IA	07/02/2003	75	NRG Media Limited Liability Company	La Vista, NE	Sarpy
KOPW	FM	106.9	C	Rhymc/CHR	Omaha-Council Bluffs, NE-IA	07/02/2003	75	NRG Media Limited Liability Company	Plattsmouth, NE	Cass
KOZN	AM	1620	C	Sports	Omaha-Council Bluffs, NE-IA	07/02/2003	75	NRG Media Limited Liability Company	Bellevue, NE	Sarpy
KQCH	FM	94.1	C	CHR	Omaha-Council Bluffs, NE-IA	07/02/2003	75	SummitMedia LLC	Omaha, NE	Douglas
KQKQ	FM	98.5	C	Hot AC	Omaha-Council Bluffs, NE-IA	07/02/2003	75	NRG Media Limited Liability Company	Council Bluffs, IA	Pottawattamie
KSRZ	FM	104.5	C	AC	Omaha-Council Bluffs, NE-IA	07/02/2003	75	SummitMedia LLC	Omaha, NE	Sarpy
KVNO	FM	90.7	NC	Classical	Omaha-Council Bluffs, NE-IA	07/02/2003	75	University of Nebraska	Omaha, NE	Douglas
KVSS	FM	102.7	NC	Religion	Omaha-Council Bluffs, NE-IA	05/04/2010	75	VSS Catholic Communications Inc	Papillion, NE	Sarpy
KXKT	FM	103.7	C	Country	Omaha-Council Bluffs, NE-IA	07/02/2003	75	iHeartMedia Inc	Glenwood, IA	Cass
KXSP	AM	590	C	Sports	Omaha-Council Bluffs, NE-IA	07/02/2003	75	SummitMedia LLC	Omaha, NE	Sarpy
KYFG	FM	88.9	NC	Christian	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Bible Broadcasting Network Inc	Omaha, NE	Douglas
KZLW	FM	90.1	NC	ChrsContem	Omaha-Council Bluffs, NE-IA	03/10/2011	75	MyBridge	Gretna, NE	Sarpy
KZOT	AM	1180	C	Sports	Omaha-Council Bluffs, NE-IA	07/02/2003	75	NRG Media Limited Liability Company	Bellevue, NE	Sarpy

Number of Stations in Geographic Market 31

Previous Stations in Geographic Market

KCSI	FM	95.3	C	Country		09/27/2010	0	Hawkeye Communications Inc	Villisca, IA	Montgomery
------	----	------	---	---------	--	------------	---	----------------------------	--------------	------------

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

"p" indicates pending sale to owner listed

FCC Geographic Market Definition for Omaha-Council Bluffs, NE-IA

Call Letters	AM/ FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
-----------------	-----------	------	-----------------	--------	----------------	----------------------------	---------------------	-------	----------------------------	----------------------
