

## **MULTIPLE OWNERSHIP**

WRAL-FM, Inc., the licensee of the subject station WRAL-FM, Raleigh, NC, is a wholly-owned subsidiary of Capitol Broadcasting Company, Inc. (“CBC”). As demonstrated below, both CBC and this proposed application comply with the Commission’s multiple ownership rules set forth in 47 C.F.R. § 73.3555.

CBC holds an attributable interest in the following broadcast stations in the Raleigh market:

- 1) Two television stations in the Raleigh-Durham (Fayetteville) Designated Market Area (“Raleigh DMA”): WRAL-TV, Raleigh, and WRAZ(TV), Raleigh;<sup>1</sup> and
- 2) Four radio stations (2 AM, 2 FM) in the Raleigh Nielsen Audio market: WRAL-FM, Raleigh, NC; WCMC-FM, Holly Springs, NC; WCLY(AM), Raleigh, NC; and WDNC(AM), Durham, NC.<sup>2</sup>

Pursuant to Section 73.3555(c)(2)(i)(A) of the FCC’s rules, an entity may own up to 2 television stations (if permitted under Section 73.3555(b))<sup>3</sup> and 6 commercial radio stations (if permitted under Section 73.3555(a)) in the same market if at least 20 independently owned media voices would remain in the market post-merger.

### **Compliance with Section 73.3555(a) (the Local Radio Ownership Rule)**

According to BIA Kelsey, there are 46 radio stations in the Raleigh-Durham market. Section 73.3555(a) provides that in a radio market with 45 or more radio stations in the market, an entity may own up to 8 commercial radio stations. CBC holds an attributable interest in 4 radio stations in the Raleigh-Durham market – WDNC(AM), Durham, WCLY(AM), Raleigh, WRAL-FM, Raleigh, and WCMC-FM, Holly Springs. Thus, CBC complies with the local radio ownership rule with respect to the Raleigh-Durham market.

### **Compliance with Section 73.3555(c)(2)(i)(A) (the Radio/TV Cross-ownership Rule)**

The TV/radio cross-ownership rule restricts an entity that holds 2 television stations in the market to holding no more than 6 commercial radio stations in the market, provided that more than 20 independently owned media voices will remain in the Raleigh market.

There are more than 20 independently owned media voices in the Raleigh market, as shown below:

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<sup>1</sup> CBC is also the licensee of Class A low power television station WARZ-CD, Raleigh, North Carolina. However, per Section 74.732(b) of the Commission’s rules, low power television stations are not counted for purposes of the Commission’s multiple ownership rules. 47 C.F.R. § 74.732(b).

<sup>2</sup> CBC also holds an attributable interest in five radio stations in the Wilmington, North Carolina market that are not at issue here, because the noise-limited service contours of WRAL-TV and WRAZ(TV) do not overlap the communities of any of those radio stations.

<sup>3</sup> CBC has lawfully owned the 2 television stations in Raleigh, as permitted under Section 73.3555(b), since 2000.

Independently Owned Television Stations,<sup>4</sup>  
Radio Stations,<sup>5</sup> Newspapers<sup>6</sup> and Cable Systems<sup>7</sup>  
Located in the Raleigh-Durham, NC Market

1.	ABC/Disney	WTVD(TV)
2.	Capitol Broadcasting Company, Inc. (not to be counted)	WRAL-TV, WRAZ(TV), WRAL(FM), WCMC-FM, WDNC(AM), WCLY(AM)
3.	Nexstar	WNCN(TV)
4.	Sinclair Broadcast Group	WLFL(TV), WRDC(TV)
5.	Radiant Life Ministries	WRAY-TV
6.	Univision	WUVC-DT
7.	Scripps/ION	WRPX(TV), WFPX(TV)
8.	North Carolina university system	WUNC-TV, WUNP-TV, WUNC(FM), WKNC-FM, WNCU(FM)
9.	Urban One	WFXK(FM), WFXC(FM), WNNL(FM), WQOK(FM)
10.	Truth Broadcasting	WTSB(AM), WDRU(AM), WRJD(AM) (pending), WTIK(AM) (pending)
11.	Chapel Hill Media Group, LLC/Rudd	WCHL(AM)
12.	iHeart Media	WDCG(FM), WTKK(FM), WRDU(FM), WNCB(FM)
13.	Curtis Media Group	WPTF(AM), WPTK(AM), WQDR(AM), WBBB(FM), WFNL(AM), WPLW(FM), WQDR(FM), WKIX(FM)
14.	Estuardo Rodriguez	WGSB(AM), WRTG(AM), WLLQ(AM)
15.	Divine Mercy Radio	WETC(AM)
16.	Fellowship Baptist Church Inc.	WHPY(AM)
17.	Johnson Broadcast Venture	WMPM(AM)
18.	Chatham Broadcasting Co.	WNCA(AM)
19.	WPJL Inc. (William Suttles)	WPJL(AM)
20.	Benson-Dunn Broadcasting	WPYB(AM)
21.	St. Augustine's University	WAUG(AM)
22.	Liberty University	WVRD(FM)
23.	Educational Information Corporation	WCPE-FM
24.	Educational Media Foundation	WRKV(FM)
25.	Duke University	WXDU(FM)
26.	Student Educational Broadcasting Inc.	WXYC(FM)
27.	A and D Broadcasting	WYRN(AM)
28.	Arohi Media LLC	WDUR(AM)
29.	Radio Training Network, Inc.	WRTP(FM)
30.	McClatchy	<i>The News &amp; Observer</i> (7-days/week daily newspaper)
31.	Gannett	<i>The Fayetteville Observer</i> (7-days/week daily newspaper)
32.	Charter Cable	Charter Cable

<sup>4</sup> Included are TV stations located and operating within the Raleigh DMA.

<sup>5</sup> Included are radio stations in the Raleigh-Durham Nielsen Audio market.

<sup>6</sup> Included are daily English language newspapers that are published at least 4 days a week and that have a circulation exceeding 5% of the households in the market.

<sup>7</sup> Included is one cable service.