

## **Multiple Ownership**

The instant application is one of two concurrently filed applications on FCC Form 2100, Schedule 314 which collectively seek Commission consent to the assignment of the more than 200 radio stations controlled by Alpha Media Holdings LLC (“Alpha”) as debtor-in-possession to license subsidiaries of Alpha upon emergence from bankruptcy.

### **I. Overview**

Alpha’s emergence from bankruptcy will not create any new combination of stations in any given local radio market, and no party to this application holds any other attributable media interests. This exhibit consists of demonstrations of continued compliance of existing Alpha station combinations with the local radio ownership rule (Alpha’s operations do not trigger any other of the FCC’s multiple ownership rules). Section II addresses Alpha stations assigned to Nielsen Metro markets. Section III addresses contour overlap combinations that include stations that are neither “home” to nor geographically within any Nielsen Metro market. These contour overlap combinations are analyzed in detail in the Contour Report of Guest Technology, LLC attached hereto.

### **II. Nielsen Metro Showings**

#### **1. Amarillo, TX**

Alpha owns the following 3 FM and 1 AM stations that are “home” to and licensed to communities geographically within the Amarillo, TX Nielsen Metro, as reported by BIA:

<b>Calls</b>	<b>AM/FM</b>	<b>Fac. ID</b>	<b>City</b>	<b>ST</b>	<b>Nielsen Metro</b>
KGNC	AM	63159	Amarillo	TX	Amarillo, TX
KGNC-FM	FM	63161	Amarillo	TX	Amarillo, TX
KXGL	FM	39781	Amarillo	TX	Amarillo, TX
KVWE	FM	39892	Amarillo	TX	Amarillo, TX

As demonstrated in the BIA printout attached, the Amarillo Metro contains 35 full power radio stations, allowing common ownership of 7 stations, no more than 4 of which may be in the same service. Therefore, Alpha’s common ownership of 3 FM stations and 1 AM stations in the market complies with Section 73.3555(a) of the Commission’s rules.

## 2. Anchorage, AK

Alpha owns the following 4 FM and 2 AM stations which are “home” to and licensed to communities geographically within the Anchorage, AK Nielsen Metro, as reported by BIA:

Calls	AM/FM	Fac. ID	City	ST	Nielsen Metro
KBRJ	FM	60915	Anchorage	AK	Anchorage, AK
KEAG	FM	28648	Anchorage	AK	Anchorage, AK
KFQD	AM	52675	Anchorage	AK	Anchorage, AK
KHAR	AM	60914	Anchorage	AK	Anchorage, AK
KMXS	FM	52677	Anchorage	AK	Anchorage, AK
KWHL	FM	52672	Anchorage	AK	Anchorage, AK

As demonstrated in the BIA printout attached, the Anchorage Metro contains 31 full power radio stations, allowing common ownership of 7 stations, no more than 4 of which may be in the same service. Therefore, Alpha’s common ownership of 4 FM stations and 2 AM station in the market complies with Section 73.3555(a) of the Commission’s rules.

## 3. Bakersfield, CA

Alpha owns the following 3 FM and 1 AM stations which are “home” to and licensed to communities geographically within the Bakersfield, CA Nielsen Metro, as reported by BIA:

Calls	AM/FM	Fac. ID	City	ST	Nielsen Metro
KKBB	FM	7720	Bakersfield	CA	Bakersfield, CA
KLLY	FM	7709	Oildale	CA	Bakersfield, CA
KNZR	AM	7715	Bakersfield	CA	Bakersfield, CA
KNZR-FM	FM	8109	Shaffer	CA	Bakersfield, CA

As demonstrated in the BIA printout attached, the Bakersfield Metro contains 51 full power radio stations, allowing common ownership of 8 stations, no more than 5 of which may be in the same service. Therefore, Alpha’s common ownership 3 FM stations and 1 AM station in the market complies with Section 73.3555(a) of the Commission’s rules.

## 4. Canton, OH

Alpha owns 1 FM and 1 AM station which are “home” to and licensed to communities geographically within the Canton, OH Nielsen Metro, as reported by BIA:

Calls	AM/FM	Fac. ID	City	ST	Nielsen Metro
WHBC	AM	4489	Canton	OH	Canton, OH
WHBC-FM	FM	4488	Canton	OH	Canton, OH

Common ownership of a single AM station and a single FM station is permissible in any market; thus, Alpha's proposed ownership of WHBC(AM) and WHBC-FM complies with the Section 73.3555(a) of the Commission's rules.

## 5. Chicago, IL

Alpha owns the following 4 FM and 3 AM stations which are "home" to and licensed to communities geographically within the Chicago, IL Nielsen Metro, as reported by BIA:

<b>Calls</b>	<b>AM/FM</b>	<b>Fac. ID</b>	<b>City</b>	<b>ST</b>	<b>Nielsen Metro</b>
WERV-FM	FM	73171	Aurora	IL	Chicago, IL
WCCQ	FM	10677	Crest Hill	IL	Chicago, IL
WJOL	AM	62235	Joliet	IL	Chicago, IL
WSSR	FM	62240	Joliet	IL	Chicago, IL
WKRS	AM	10450	Waukegan	IL	Chicago, IL
WXLC	FM	10451	Waukegan	IL	Chicago, IL
WLIP	AM	28478	Kenosha	WI	Chicago, IL

As demonstrated in the BIA printout attached, the Chicago Metro contains 137 full power radio stations, allowing common ownership of eight stations, no more than five of which may be in the same service. Therefore, Alpha's common ownership of 4 FM stations and 3 AM stations in the market complies with Section 73.3555(a) of the Commission's rules.

## 6. Columbia, SC

Alpha owns the following 4 FM and 1 AM stations which are "home" to and licensed to communities geographically within the Columbia, SC Nielsen Metro, as reported by BIA:

<b>Calls</b>	<b>AM/FM</b>	<b>Fac. ID</b>	<b>City</b>	<b>ST</b>	<b>Nielsen Metro</b>
WARQ	FM	58400	Columbia	SC	Columbia, SC
WHXT	FM	50522	Orangeburg	SC	Columbia, SC
WMFX	FM	19471	St. Andrews	SC	Columbia, SC
WPCO	AM	73370	Columbia	SC	Columbia, SC
WWDW	FM	58398	Sumter	SC	Columbia, SC
WSCZ	FM	54576	Winnsboro	SC	Columbia, SC

As demonstrated in the BIA printout attached, the Columbia Metro contains 30 full power radio stations, allowing common ownership of eight stations, no more than five of which may be in the same service. Therefore, Alpha's common ownership 4 FM stations and 1 AM station in the market complies with Section 73.3555(a) of the Commission's rules. Certain of these stations have overlapping principal community contours with Alpha station WSCZ(FM), as addressed in the Contour Report.

## 7. Dallas-Ft. Worth, TX

Alpha owns 1 FM station that is “home” to the Dallas-Ft. Worth, TX Metro as reported by BIA:

Calls	AM/FM	Fac. ID	City	ST	Nielsen Metro
KLAK	FM	36265	Tom Bean	TX	Dallas-Ft. Worth, TX

Alpha’s ownership of this single FM station in the Dallas-Ft. Worth Metro complies with the local radio ownership rule. KLAK(FM), however, is licensed to a community outside the Dallas-Ft. Worth Metro. A contour overlap showing relating to KLAK(FM), together with two overlapping non-Metro stations, KMKT(FM), Bells, TX (Fac. ID 77588) and KMAD-FM is analyzed in the Contour Report.

## 8. Dayton, OH

Alpha owns the following 4 FM and 1 AM stations which are “home” to and licensed to communities geographically within the Dayton, OH Nielsen Metro, as reported by BIA.

Calls	AM/FM	Fac. ID	City	ST	Nielsen Metro
WDHT	FM	60252	Urbana	OH	Dayton, OH
WGTZ	FM	25043	Eaton	OH	Dayton, OH
WING	AM	25039	Dayton	OH	Dayton, OH
WCLI-FM	FM	10113	Enon	OH	Dayton, OH
WROU-FM	FM	26451	West Carrollton	OH	Dayton, OH

As demonstrated in the BIA printout attached, the Dayton Metro contains 38 full power radio stations, allowing common ownership of 7 stations, no more than 4 of which may be in the same service. Therefore, Alpha’s common ownership of 4 FM stations and 1 AM station in the market complies with Section 73.3555(a) of the Commission’s rules.

## 9. Des Moines, IA

Alpha owns 1 FM and 1 AM station which are “home” to and licensed to communities geographically within the Des Moines, IA Nielsen Metro as reported by BIA:

Calls	AM/FM	Fac. ID	City	ST	Nielsen Metro
KCOB	AM	9900	Newton	IA	Des Moines, IA
KCOB-FM	FM	9899	Newton	IA	Des Moines, IA

Common ownership of a single AM station and a single FM station is permissible in any market; thus, Alpha’s proposed ownership of KCOB(AM) and KCOB-FM complies with Section 73.3555(a) of the Commission’s rules. KCOB(AM) and KCOB-FM have overlapping principal

community contours with Alpha stations in Grinnell, IA which are licensed outside of any Metro. This station combination is addressed in the Contour Report.

## 10. Fredericksburg, VA

Alpha owns the following 3 FM and 1 AM stations which are “home” to and licensed to communities geographically within the Fredericksburg, VA Nielsen Metro, as reported by BIA:

<b>Calls</b>	<b>AM/FM</b>	<b>Fac. ID</b>	<b>City</b>	<b>ST</b>	<b>Nielsen Metro</b>
WFLS-FM	FM	65641	Fredericksburg	VA	Fredericksburg, VA
WNTX	AM	65640	Fredericksburg	VA	Fredericksburg, VA
WVBX	FM	22484	Spotsylvania	VA	Fredericksburg, VA
WWUZ	FM	55174	Bowling Green	VA	Fredericksburg, VA

As demonstrated in the BIA printout attached, the Fredericksburg Metro contains 15 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Therefore, Alpha’s common ownership 3 FM stations and 1 AM station in the market complies with Section 73.3555(a) of the Commission’s rules.

## 11. Hagerstown-Chambersburg-Waynesboro, MD/PA

Alpha owns the following 3 FM and 2 AM stations which are “home” to and licensed to communities geographically within the Hagerstown-Chambersburg-Waynesboro, MD/PA Nielsen Metro, as reported by BIA:

<b>Calls</b>	<b>AM/FM</b>	<b>Fac. ID</b>	<b>City</b>	<b>ST</b>	<b>Nielsen Metro</b>
WCHA	AM	10110	Chambersburg	PA	Hagerstown-Chambersburg-Waynesboro, MD/PA
WDLD	FM	23469	Halfway	MD	Hagerstown-Chambersburg-Waynesboro, MD/PA
WHAG	AM	23466	Halfway	MD	Hagerstown-Chambersburg-Waynesboro, MD/PA
WIKZ	FM	10108	Chambersburg	PA	Hagerstown-Chambersburg-Waynesboro, MD/PA
WQCM	FM	25128	Greencastle	PA	Hagerstown-Chambersburg-Waynesboro, MD/PA

As demonstrated in the BIA printout attached, the Hagerstown-Chambersburg-Waynesboro, MD/PA Metro contains 20 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Therefore, Alpha's common ownership of 3 FM stations and 2 AM stations in the market complies with Section 73.3555(a) of the Commission's rules.

## 12. Jackson, MS

Alpha owns the following 3 FM and 3 AM stations, and has an attributable interest in 1 FM station through a Time Brokerage Agreement, which are "home" to and licensed to communities geographically within the Jackson, MS Nielsen Metro, as reported by BIA:

Calls	AM/FM	Fac. ID	City	ST	Nielsen Metro
WJMI	FM	50409	Jackson	MS	Jackson, MS
WJNT	AM	7691	Pearl	MS	Jackson, MS
WJQS	AM	50409	Jackson	VA	Jackson, MS
WKXI-FM	FM	50407	Magee	MS	Jackson, MS
WOAD	AM	50404	Jackson	MS	Jackson, MS
WRKS	FM	29512	Pickens	MS	Jackson, MS
WJXN-FM	FM	72818	Utica	MS	Jackson, MS (TBA)

As demonstrated in the BIA printout attached, the Jackson, MS Metro contains 33 full power radio stations, allowing common ownership of 7 stations, no more than 4 of which may be in the same service. Therefore, Alpha's attributable interest in 4 FM stations and 3 AM stations in the market complies with Section 73.3555(a) of the Commission's rules.

## 13. Lincoln, NE

Alpha owns the following 4 FM and 2 AM stations which are "home" to the Lincoln, NE Nielsen Metro:

Calls	AM/FM	Fac. ID	City	ST	Nielsen Metro
KTGL	FM	53141	Beatrice	NE	Lincoln, NE
KIBZ	FM	640	Crete	NE	Lincoln, NE
KFOR	AM	34436	Lincoln	NE	Lincoln, NE
KFRX	FM	57287	Lincoln	NE	Lincoln, NE
KLMS	AM	54708	Lincoln	NE	Lincoln, NE
KZKX	FM	53143	Seward	NE	Lincoln, NE

As demonstrated in the BIA printout attached, the Lincoln Metro contains 16 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Therefore, Alpha's common ownership 4 FM stations and 2 AM stations in the market complies with Section 73.3555(a) of the Commission's rules.

Three of the Alpha stations listed above—KIBZ(FM), Crete, NE, KTGL(FM), Beatrice, NE and KZKX(FM), Seward, NE—are “home” to the Lincoln Metro but are licensed to communities geographically outside the Metro. The accompanying Contour Report demonstrates that Alpha’s ownership of the above combination of stations in the Lincoln, NE market also complies with the radio ownership limits under the Commission’s interim contour methodology.

#### 14. Louisville, KY

Alpha owns the following 5 FM stations which are “home” to and licensed to communities geographically within the Louisville, KY Nielsen Metro, as reported by BIA:

<b>Calls</b>	<b>AM/FM</b>	<b>Fac. ID</b>	<b>City</b>	<b>ST</b>	<b>Nielsen Metro</b>
WDJX	FM	55498	Louisville	KY	Louisville, KY
WGBZ-FM	FM	53202	Lanesville	IN	Louisville, KY
WGHL	FM	51704	Shepherdsville	KY	Louisville, KY
WMJM	FM	10322	Jeffersontown	KY	Louisville, KY
WXMA	FM	37236	Louisville	KY	Louisville, KY

As demonstrated in the BIA printout attached, the Louisville, KY Metro contains 47 full power radio stations, allowing common ownership of 8 stations, no more than 5 of which may be in the same service. Therefore, Alpha’s common ownership of 5 FM stations in the market complies with Section 73.3555(a) of the Commission’s rules.

#### 15. Lubbock, TX

Alpha owns the following 4 FM stations which are “home” to the Lubbock, TX Nielsen Metro, as reported by BIA:

<b>Calls</b>	<b>AM/FM</b>	<b>Fac. ID</b>	<b>City</b>	<b>ST</b>	<b>Nielsen Metro</b>
KBTE	FM	1302	Tulia	TX	Lubbock, TX
KLLL-FM	FM	36954	Lubbock	TX	Lubbock, TX
KMMX	FM	86	Tahoka	TX	Lubbock, TX
KONE	FM	26519	Lubbock	TX	Lubbock, TX

As demonstrated in the BIA printout attached, the Lubbock, TX Metro contains 31 full power radio stations, allowing common ownership of 7 stations, no more than 4 of which may be in the same service. Therefore, Alpha’s common ownership of 4 FM stations in the market complies with Section 73.3555(a) of the Commission’s rules. As stations KBTE(FM) and KMMX(FM) are not licensed to communities within the Lubbock, TX Nielsen Metro, they are also addressed in the Contour Report.

## 16. Milwaukee-Racine, WI

Alpha owns 1 FM station that is “home” to and geographically within the Milwaukee-Racine, WI Metro as reported by BIA:

Calls	AM/FM	Fac. ID	City	ST	Nielsen Metro
WIIL	FM	28473	Union Grove	WI	Milwaukee-Racine, WI

Alpha’s ownership of this single FM station in the Milwaukee-Racine Metro complies with the Section 73.3555(a) of the Commission’s rules.

## 17. Palm Springs, CA

Alpha owns the following 4 FM and 2 AM stations which are “home” to and licensed to communities geographically within the Palm Springs, CA Nielsen Metro, as reported by BIA:

Calls	AM/FM	Fac. ID	City	ST	Nielsen Metro
KCLB-FM	FM	12131	Coachella	CA	Palm Springs, CA
KKUU	FM	11658	Indio	CA	Palm Springs, CA
KNWQ	AM	72030	Palm Springs	CA	Palm Springs, CA
KNWZ	AM	12130	Coachella	CA	Palm Springs, CA
KPSI-FM	FM	35497	Palm Springs	CA	Palm Springs, CA
KDES-FM	FM	24253	Cathedral City	CA	Palm Springs, CA

As demonstrated in the BIA printout attached, the Palm Springs Metro contains 32 full power radio stations, allowing common ownership of 7 stations, no more than 4 of which may be in the same service. Therefore, Alpha’s common ownership of 4 FM and 2 AM stations in the market complies with Section 73.3555(a) of the Commission’s rules.

## 18. Portland, OR

Alpha owns the following 4 FM and 2 AM stations which are “home” to and licensed to communities geographically within the Portland, OR Nielsen Metro, as reported by BIA:

Calls	AM/FM	Fac. ID	City	ST	Nielsen Metro
KBFF	FM	949	Portland	OR	Portland, OR
KINK	FM	53068	Portland	OR	Portland, OR
KUFO	AM	26926	Portland	OR	Portland, OR
KUPL	FM	4114	Portland	OR	Portland, OR
KXL-FM	FM	26932	Portland	OR	Portland, OR
KXTG	AM	948	Portland	OR	Portland, OR

As demonstrated in the BIA printout attached, the Portland, OR Metro contains 63 full power radio stations, allowing common ownership of 8 stations, no more than 5 of which may be in the



same service. Therefore, Alpha's common ownership of 4 FM and 2 AM stations in the market complies with Section 73.3555(a) of the Commission's rules.

## 19. Saginaw-Bay City-Midland, MI

Alpha owns the following 4 FM stations and 1 AM station which are "home" to and licensed to communities within the Saginaw-Bay City-Midland, MI Nielsen Metro:

<b>Calls</b>	<b>AM/FM</b>	<b>Fac. ID</b>	<b>City</b>	<b>ST</b>	<b>Nielsen Metro</b>
WSGW-FM	FM	41842	Carrollton	MI	Saginaw-Bay City-Midland, MI
WCEN-FM	FM	60787	Hemlock	MI	Saginaw-Bay City-Midland, MI
WGER	FM	20384	Saginaw	MI	Saginaw-Bay City-Midland, MI
WSGW	AM	22674	Saginaw	MI	Saginaw-Bay City-Midland, MI
WTLZ	FM	74093	Saginaw	MI	Saginaw-Bay City-Midland, MI

As demonstrated in the BIA printout attached, the Saginaw-Bay City-Midland Metro contains 25 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Therefore, common ownership by Alpha of 4 FM stations and 1 AM station in the market complies with Section 73.3555(a) of the Commission's rules.

## 20. Salt Lake City, UT

Alpha owns the following 2 FM stations and 1 AM station which are "home" to the Salt Lake City, UT Nielsen Metro:

<b>Calls</b>	<b>AM/FM</b>	<b>Fac. ID</b>	<b>City</b>	<b>ST</b>	<b>Nielsen Metro</b>
KDUT	FM	88272	Randolph	UT	Salt Lake City, UT
KTUB	AM	69557	Centerville	UT	Salt Lake City, UT
KBMG	FM	20029	Evanston	WY	Salt Lake City, UT

As demonstrated in the BIA printout attached, the Salt Lake City, UT Metro contains 62 full power radio stations, allowing common ownership of 8 stations, no more than 5 of which may be in the same service. Therefore, Alpha's common ownership of 2 FM stations and 1 AM station in the market complies with Section 73.3555(a) of the Commission's rules. Stations KBMG(FM) and KDUT(FM) are licensed to communities outside of the Salt Lake City, UT Nielsen Metro, and are addressed in the Contour Report.

## 21. San Antonio, TX

Alpha owns the following 4 FM and 3 AM stations which are “home” to and licensed to communities geographically within the San Antonio, TX Nielsen Metro, as reported by BIA:

<b>Calls</b>	<b>AM/FM</b>	<b>Fac. ID</b>	<b>City</b>	<b>ST</b>	<b>Nielsen Metro</b>
KJXX	FM	71086	San Antonio	TX	San Antonio, TX
KLEY-FM	FM	55414	Jourdanton	TX	San Antonio, TX
KSAH	AM	23072	Universal City	TX	San Antonio, TX
KSAH-FM	FM	83596	Pearsall	TX	San Antonio, TX
KTFM	FM	2543	San Antonio	TX	San Antonio, TX
KTSA	AM	71087	San Antonio	TX	San Antonio, TX
KZDC	AM	65330	San Antonio	TX	San Antonio, TX

As demonstrated in the BIA printout attached, the San Antonio, TX Metro contains 61 full power radio stations, allowing common ownership of 8 stations, no more than 5 of which may be in the same service. Therefore, Alpha’s common ownership of 4 FM and 3 AM stations in the market complies with Section 73.3555(a) of the Commission’s rules. Certain of the principal community contours of these stations overlap with Alpha station KHHL(FM), Karnes City, TX, which is outside of any Nielsen Metro, as addressed in the Contour Report.

## 22. San Francisco and San Jose, CA

Alpha owns 2 FM stations that are “home” to and licensed to communities geographically within the San Francisco Metro and 3 FM stations “home” to and licensed to communities geographically within the San Jose Metro as reported by BIA. By virtue of the San Jose Metro’s embedded status, Alpha owns a total of 5 FM stations in the San Francisco Metro.

<b>Calls</b>	<b>AM/FM</b>	<b>Fac. ID</b>	<b>City</b>	<b>ST</b>	<b>Nielsen Metro</b>
KUIC	FM	54261	Vacaville	CA	San Francisco, CA
KKIQ	FM	67818	Livermore	CA	San Francisco, CA
KKDV	FM	3602	Walnut Creek	CA	San Francisco, CA
KEZR	FM	1176	San Jose	CA	San Jose, CA
KBAY	FM	35401	Gilroy	CA	San Jose, CA

As demonstrated in the BIA printout attached, the San Jose Metro contains 26 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Therefore, common ownership of Alpha’s 2 FM stations in the San Jose Metro complies with Section 73.3555(a) of the Commission’s rules.

As demonstrated in BIA printout attached, the San Francisco Metro contains 115 full power radio stations, allowing common ownership of 8 stations, no more than 5 of which may be in the same service. Therefore, Alpha’s common ownership of 5 FM stations in the San Francisco

Metro (including Alpha's two stations in the embedded San Jose Metro) complies with Section 73.3555(a) of the Commission's rules.

### **23. Savannah, GA**

Alpha owns the following 4 FM and 3 AM stations which are either "home" to or licensed to communities geographically within the Savannah, GA Nielsen Metro, as reported by BIA:

<b>Calls</b>	<b>AM/FM</b>	<b>Fac. ID</b>	<b>City</b>	<b>ST</b>	<b>Nielsen Metro</b>
WFXH-FM	FM	48367	Hilton Head Island	SC	Savannah, GA
WGCO	FM	11674	Midway	GA	Savannah, GA
WUBB	FM	16844	Bluffton	SC	Savannah, GA
WXYX	FM	54805	Rincon	GA	Savannah, GA

As demonstrated in the BIA printout attached, the Savannah, GA Metro contains 23 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Therefore, Alpha's common ownership of 4 FM stations in the market complies with Section 73.3555(a) of the Commission's rules. Certain of the principal community contours of these stations overlap with Alpha stations WHHW(AM), Hilton Head Island, SC and WRWN(FM), Port Royal, SC, which are outside of any Nielsen Metro, as addressed in the Contour Report.

### **24. Shreveport, LA**

Alpha owns the following 4 FM and 1 AM stations which are "home" to and licensed to communities geographically within the Shreveport, LA Nielsen Metro, as reported by BIA:

<b>Calls</b>	<b>AM/FM</b>	<b>Fac. ID</b>	<b>City</b>	<b>ST</b>	<b>Nielsen Metro</b>
KBTT	FM	9221	Haughton	LA	Shreveport, LA
KOKA	AM	9222	Shreveport	LA	Shreveport, LA
KDKS-FM	FM	16436	Blanchard	LA	Shreveport, LA
KTAL-FM	FM	33728	Texarkana	TX	Shreveport, LA
KLKL	FM	13802	Minden	LA	Shreveport, LA

As demonstrated in the BIA printout attached, the Shreveport, LA Metro contains 32 full power radio stations, allowing common ownership of 7 stations, no more than 4 of which may be in the same service. Therefore, Alpha's common ownership of 4 FM stations and 1 AM station in the market complies with Section 73.3555(a) of the Commission's rules.

## 25. St. Louis, MO

Alpha owns 1 AM station that is “home” to and geographically within the St. Louis, MO Metro as reported by BIA:

Calls	AM/FM	Fac. ID	City	ST	Nielsen Metro
KJFF	AM	35532	Festus	MO	St. Louis, MO

Alpha’s ownership of this single AM station in the St. Louis, MO Metro complies with the local Section 73.3555(a) of the Commission’s rules. The principal community contour of this station overlaps with those of Alpha stations KREI(AM) and KTJJ(FM), Farmington, MO as addressed in the Contour Report.

## 26. Topeka, KS

Alpha owns the following 3 FM and 1 AM stations which are “home” to and licensed to communities geographically within the Topeka, KS Nielsen Metro, as reported by BIA:

Calls	AM/FM	Fac. ID	City	ST	Nielsen Metro
WIBW	AM	63169	Topeka	KS	Topeka, KS
WIBW-FM	FM	63174	Topeka	KS	Topeka, KS
KTPK(FM)	FM	67334	Topeka	KS	Topeka, KS
KSAJ-FM	FM	18055	Burlingame	KS	Topeka, KS

As demonstrated in the BIA printout attached, the Topeka, KS Metro contains 16 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Therefore, Alpha’s common ownership of 3 FM stations and 1 AM station in the market complies with Section 73.3555(a) of the Commission’s rules.

## 27. Tyler-Longview, TX

Alpha owns the following 3 FM stations which are “home” to and licensed to communities geographically within the Tyler-Longview, TX Nielsen Metro, as reported by BIA:

Calls	AM/FM	Fac. ID	City	ST	Nielsen Metro
KOOI	FM	70740	Jacksonville	TX	Tyler-Longview, TX
KYKX	FM	54844	Longview	TX	Tyler-Longview, TX
KKUS	FM	68651	Tyler	TX	Tyler-Longview, TX

As demonstrated in the BIA printout attached, Tyler-Longview, TX Metro contains 35 full power radio stations, allowing common ownership of 7 stations, no more than 4 of which may be in the same service. Therefore, Alpha’s common ownership of 3 FM stations in the market complies with Section 73.3555(a) of the Commission’s rules. The principal community contour

of these stations overlaps with those of Alpha stations KOYE(FM), Frankston, TX; and KTLH(FM), Hallsville, TX, as addressed in the Contour Report.

## **28. Victor Valley, CA**

Alpha owns the following 2 FM and 1 AM stations which are “home” to and licensed to communities geographically within the Victor Valley Nielsen Metro, as reported by BIA:

<b>Calls</b>	<b>AM/FM</b>	<b>Fac. ID</b>	<b>City</b>	<b>ST</b>	<b>Nielsen Metro</b>
KDGL	FM	14058	Yucca Valley	CA	Victor Valley, CA
KNWH	AM	67028	Yucca Valley	CA	Victor Valley, CA
KCLZ	FM	183327	29 Palms Base	CA	Victor Valley, CA

As demonstrated in the BIA printout attached, the Victor Valley, CA Metro contains 37 full power radio stations, allowing common ownership of 7 stations, no more than 4 of which may be in the same service. Therefore, Alpha’s common ownership of 2 FM stations and 1 AM station in the market complies with Section 73.3555(a) of the Commission’s rules.

## **III. Combinations Involving Non-Metro Stations**

Numerous of the Alpha stations being acquired by Alpha are not “home” to or geographically located within any Nielsen Metro market. The contour-defined “markets” and the Alpha stations involved are listed below and analyzed in detail in the attached Contour Report prepared by Guest Technology. As demonstrated therein, each of the combinations complies with the local radio ownership rule.