

MULTIPLE OWNERSHIP RULES

Rincon Broadcasting LS2 LLC (“Rincon 2”), the licensee of KSBL(FM), hereby demonstrates that the instant modification application fully complies with the Commission’s multiple ownership rules.

KSBL is “home” to the Nielsen Audio Santa Barbara radio market. Rincon 2 itself is not the licensee of any other radio stations in this market; however, Rincon Broadcasting LS LLC (“Rincon”), Rincon 2’s commonly owned affiliate, is the licensee of the following stations in the Santa Barbara market:

- KOSJ(AM), SANTA BARBARA, CA
- KTMS(AM), SANTA BARBARA, CA
- KIST-FM, CARPINTERIA, CA
- KSPE(FM) ELLWOOD, CA
- KTYD(FM), SANTA BARBARA, CA

Neither Rincon, Rincon 2, or any other party to this application has any other attributable ownership interests, whether by ownership, LMA, or JSA, in any other station in the Santa Barbara market.

The most recent available Nielsen data for the Santa Barbara radio market reveals that there are 17 commercial and noncommercial radio stations in the market. See BIA FCC Geographic Market Definition for Santa Barbara attached hereto.¹ Under the broadcast 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 6 radio stations, only 4 of which may be in one class. Accordingly, Rincon 2 and Rincon’s ownership of 4 FM stations and 2 AM stations in the market is fully compliant with the multiple ownership rules.

¹ The attached list indicates that Rincon and Rincon2’s stations are “owned” by Point Broadcast Company (“Point”). Point is the parent company of Rincon 2 and Rincon, which are actually the station licensee.

FCC Geographic Market Definition for Santa Barbara, 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
KCLU	AM	1340	NC	NPR/Nws/In	Santa Barbara, CA	07/02/2003	204	California Lutheran University	Santa Barbara, CA	Santa Barbara
KCSB	FM	91.9	NC	Variety	Santa Barbara, CA	07/02/2003	204	University of California Regents	Santa Barbara, CA	Santa Barbara
KDB	FM	93.7	NC	Classical	Santa Barbara, CA	07/02/2003	204	University of Southern California	Santa Barbara, CA	Santa Barbara
KDRW	FM	88.7	NC	Nws/Tlk/Var	Santa Barbara, CA	07/02/2003	204	Santa Monica Comm College	Santa Barbara, CA	Santa Barbara
KIST	FM	107.7	C	Mexican	Santa Barbara, CA	07/02/2003	204	Point Broadcasting Company	Carpinteria, CA	Santa Barbara
KJEE	FM	92.9	C	Modern	Santa Barbara, CA	07/02/2003	204	Montecito FM Inc	Montecito, CA	Santa Barbara
KLSB	FM	97.5	NC	ChrsContem	Santa Barbara, CA	07/02/2003	204	Educational Media Foundation	Goleta, CA	Santa Barbara
KOSJ	AM	1490	C	Oldies	Santa Barbara, CA	07/02/2003	204	Point Broadcasting Company	Santa Barbara, CA	Santa Barbara
KRAZ	FM	105.9	C	Country	Santa Barbara, CA	07/02/2003	204	Knight Broadcasting Inc	Santa Ynez, CA	Santa Barbara
KRUZ	FM	103.3	C	Clsc Hits	Santa Barbara, CA	01/20/2020	204	Cumulus Media Holdings Inc	Santa Barbara, CA	Santa Barbara
KSBL	FM	101.7	C	AC	Santa Barbara, CA	07/02/2003	204	Point Broadcasting Company	Carpinteria, CA	Santa Barbara
KSBX	FM	89.5	NC	Nws/Tlk/Jaz	Santa Barbara, CA	01/06/2004	204	KCBX Inc	Santa Barbara, CA	Santa Barbara
KSPE	FM	94.5	C	CHR	Santa Barbara, CA	07/02/2003	204	Point Broadcasting Company	Ellwood, CA	Santa Barbara
KTMS	AM	990	C	News/Talk	Santa Barbara, CA	07/02/2003	204	Point Broadcasting Company	Santa Barbara, CA	Santa Barbara
KTYD	FM	99.9	C	AOR	Santa Barbara, CA	07/02/2003	204	Point Broadcasting Company	Santa Barbara, CA	Santa Barbara
KZER	AM	1250	C	Mexican	Santa Barbara, CA	07/02/2003	204	Lazer Broadcasting Corporation	Santa Barbara, CA	Santa Barbara
KZSB	AM	1290	C	News/Talk	Santa Barbara, CA	07/02/2003	204	Santa Barbara Broadcasting Inc	Santa Barbara, CA	Santa Barbara

Number of Stations in Geographic Market 17

Previous Stations in Geographic Market

KVYB	FM	106.3	C	CHR	Oxnard-Ventura, CA	04/02/2013	124	Cumulus Media Holdings Inc	Oak View, CA	Ventura
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"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed