

Multiple Ownership Analysis¹

This transaction involves the assignment of one full power commercial AM radio station (KNTS). The proposed assignee has other attributable stations in the Seattle-Tacoma, WA market, specifically KZIZ (AM), Pacific, WA and KKDZ (AM) Seattle, WA. This analysis considers the existing attributable stations on a market basis for purposes of determining compliance with the multiple ownership limits set forth in 47 C.F.R. §73.3555(a).

Seattle, WA Rated Market

Seattle-Tacoma, WA is #11 Nielsen/Arbitron Rated Market, and has at least 83 full power commercial and noncommercial AM and FM stations. *See Exhibit A.* Under 47 C.F.R. §73.3555(a)(1)(i)², in a market with more than 45 full time stations, a party may own, operate or control up to 8 commercial radio stations, not more than 5 of which are in the same service. The proposed transfer of control will result in the assignee having an attributable interest in a total of three (3) commercial AM stations in this rated market (assuming the Pending Transaction is consummated). Thus, ownership of these three AM stations complies with the radio multiple ownership rules in 47 C.F.R. §73.355(a).

¹ Compliance for this transaction is analyzed herein in accordance with the FCC's 2016 multiple ownership rules, as reinstated and revised in the FCC's December 20, 2019 Order, DA 19-1303. For clarity, the transaction does not implicate the reinstated "eight voices" test, prohibition on top-four combinations in the local television rules; newspaper/broadcast cross-ownership rules; or attribution of joint sales agreements.

² § 73.3555 Multiple ownership.

(a)(1) Local radio ownership rule. A person or single entity (or entities under common control) may have a cognizable interest in licenses for AM or FM radio broadcast stations in accordance with the following limits:

(i) In a radio market with 45 or more full-power, commercial and noncommercial radio stations, not more than 8 commercial radio stations in total and not more than 5 commercial stations in the same service (AM or FM);

(ii) In a radio market with between 30 and 44 (inclusive) full-power, commercial and noncommercial radio stations, not more than 7 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM);

(iii) In a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM); and

(iv) In a radio market with 14 or fewer full-power, commercial and noncommercial radio stations, not more than 5 commercial radio stations in total and not more than 3 commercial stations in the same service (AM or FM); provided, however, that no person or single entity (or entities under common control) may have a cognizable interest in more than 50% of the full-power, commercial and noncommercial radio stations in such market unless the combination of stations comprises not more than one AM and one FM station.

EXHIBIT "A"



FCC Geographic Market Definition for Seattle-Tacoma, WA

| Call Letters | AM/FM | Freq | Type Station | Format | Home Market | Market Designtn Date | Home Mkt Rank | Owner | City & State of License | County of License |
|--------------|-------|-------|--------------|-------------|--------------------|----------------------|---------------|--------------------------------------|-------------------------|-------------------|
| KXXO | FM | 96.1 | C | Soft AC | Seattle-Tacoma, WA | 07/02/2003 | 11 | 3 Cities Inc | Olympia, WA | Thurston |
| KHTP | FM | 103.7 | C | Hip Hop | Seattle-Tacoma, WA | 07/02/2003 | 11 | Audacy | Tacoma, WA | Pierce |
| KISW | FM | 99.9 | C | Rock | Seattle-Tacoma, WA | 07/02/2003 | 11 | Audacy | Seattle, WA | King |
| KKWF | FM | 100.7 | C | Country | Seattle-Tacoma, WA | 07/02/2003 | 11 | Audacy | Seattle, WA | King |
| KNDD | FM | 107.7 | C | Alternative | Seattle-Tacoma, WA | 07/02/2003 | 11 | Audacy | Seattle, WA | King |
| KSWD | FM | 94.1 | C | Soft AC | Seattle-Tacoma, WA | 07/02/2003 | 11 | Audacy | Seattle, WA | King |
| KING | FM | 98.1 | NC | Classical | Seattle-Tacoma, WA | 07/02/2003 | 11 | Beethoven | Seattle, WA | King |
| KBCS | FM | 91.3 | NC | Variety | Seattle-Tacoma, WA | 07/02/2003 | 11 | Bellevue College | Bellevue, WA | King |
| KASB | FM | 89.9 | NC | Variety | Seattle-Tacoma, WA | 07/02/2003 | 11 | Bellevue School District 405 | Bellevue, WA | King |
| KRIZ | AM | 1420 | C | Gospel | Seattle-Tacoma, WA | 07/02/2003 | 11 | Bennett, Christopher & Gloria | Renton, WA | King |
| KYIZ | AM | 1620 | C | UCH/HHp/V | Seattle-Tacoma, WA | 07/02/2003 | 11 | Bennett, Christopher & Gloria | Renton, WA | King |
| KWFJ | FM | 89.7 | NC | Christian | Seattle-Tacoma, WA | 07/02/2003 | 11 | Bible Broadcasting Network Inc | Roy, WA | Pierce |
| KYFQ | FM | 91.7 | NC | Christian | Seattle-Tacoma, WA | 07/02/2003 | 11 | Bible Broadcasting Network Inc | Tacoma, WA | Pierce |
| KBRD | AM | 680 | NC | Nostalgia | Seattle-Tacoma, WA | 07/02/2003 | 11 | BJ & Skip's For The Music Foundation | Lacey, WA | Thurston |
| KIRO | AM | 710 | C | Sports | Seattle-Tacoma, WA | 07/02/2003 | 11 | Bonneville International Corporation | Seattle, WA | King |
| KIRO | FM | 97.3 | C | Nws/Tlk/Inf | Seattle-Tacoma, WA | 07/02/2003 | 11 | Bonneville International Corporation | Tacoma, WA | Pierce |
| KTTH | AM | 770 | C | Talk | Seattle-Tacoma, WA | 07/02/2003 | 11 | Bonneville International Corporation | Seattle, WA | King |
| KDDS | FM | 99.3 | C | Mexican | Seattle-Tacoma, WA | 07/02/2003 | 11 | Bustos Media Holdings LLC | Elma, WA | Grays Harbor |
| KMIA | AM | 1210 | C | Span/Relgn | Seattle-Tacoma, WA | 07/02/2003 | 11 | Bustos Media Holdings LLC | Auburn-Federal Way, WA | King |
| KZNW | FM | 103.3 | C | Mexican | Seattle-Tacoma, WA | 05/17/2016 | 11 | Bustos Media Holdings LLC | Oak Harbor, WA | Island |
| KZTM | FM | 102.9 | C | Mexican | Seattle-Tacoma, WA | 10/25/2005 | 11 | Bustos Media Holdings LLC | McKenna, WA | Pierce |
| KKXA | AM | 1520 | C | Country | Seattle-Tacoma, WA | 10/11/2011 | 11 | CAAM Partnership LLC | Snohomish, WA | Snohomish |
| KVTI | FM | 90.9 | NC | Cls/NPR/Jaz | Seattle-Tacoma, WA | 07/02/2003 | 11 | Clover Park Technical College | Tacoma, WA | Pierce |
| KCIS | AM | 630 | C | Inspiration | Seattle-Tacoma, WA | 07/02/2003 | 11 | CRISTA Media | Edmonds, WA | Snohomish |
| KCMS | FM | 105.3 | C | ChrsContem | Seattle-Tacoma, WA | 07/02/2003 | 11 | CRISTA Media | Edmonds, WA | Snohomish |
| KWPZ | FM | 106.5 | C | ChrsContem | Seattle-Tacoma, WA | 07/02/2003 | 11 | CRISTA Media | Lynden, WA | Whatcom |
| KARR | AM | 1460 | NC | DARK | Seattle-Tacoma, WA | 07/02/2003 | 11 | Dalke, James A | Kirkland, WA | King |
| KLSW | FM | 104.5 | NC | ChrsContem | Seattle-Tacoma, WA | 09/26/2005 | 11 | Educational Media Foundation | Covington, WA | King |
| KWAO | FM | 88.1 | NC | Chrst/Alive | Seattle-Tacoma, WA | 05/03/2018 | 11 | Educational Media Foundation | Ocean Park, WA | Pacific |
| KAOS | FM | 89.3 | NC | Edtic/Varty | Seattle-Tacoma, WA | 07/02/2003 | 11 | Evergreen State College | Olympia, WA | Thurston |
| KNKX | FM | 88.5 | NC | Jaz/Blu/NPR | Seattle-Tacoma, WA | 07/02/2003 | 11 | Friends of 88.5 FM | Tacoma, WA | Pierce |
| KPLI | FM | 90.1 | NC | Jaz/Blu/NPR | Seattle-Tacoma, WA | 04/26/2005 | 11 | Friends of 88.5 FM | Olympia, WA | Thurston |
| KEXP | FM | 90.3 | NC | Eclectic | Seattle-Tacoma, WA | 07/02/2003 | 11 | Friends of KEXP | Seattle, WA | King |
| KGTK | AM | 920 | C | Talk/BusNw | Seattle-Tacoma, WA | 07/02/2003 | 11 | Gottlieb, Alan M. | Olympia, WA | Thurston |

C - Commercial Station; *NC* - Non Commercial Station

p indicates pending sale to owner listed



FCC Geographic Market Definition for Seattle-Tacoma, WA

| Call Letters | AM/FM | Freq | Type Station | Format | Home Market | Market Designtn Date | Home Mkt Rank | Owner | City & State of License | County of License |
|--------------|-------|-------|--------------|-------------|--------------------|----------------------|---------------|--------------------------------------|--------------------------|-------------------|
| KITZ | AM | 1400 | C | Talk/BusNw | Seattle-Tacoma, WA | 07/02/2003 | 11 | Gottlieb, Alan M. | Silverdale, WA | Kitsap |
| KGRG | AM | 1330 | NC | Altvs/Oldes | Seattle-Tacoma, WA | 07/02/2003 | 11 | Green River College | Enumclaw, WA | King |
| KGRG | FM | 89.9 | NC | Modern | Seattle-Tacoma, WA | 07/02/2003 | 11 | Green River College | Auburn, WA | King |
| KIXI | AM | 880 | C | Adlt Stndrd | Seattle-Tacoma, WA | 07/02/2003 | 11 | Hubbard Radio LLC | Mercer Island/seattl, WA | King |
| KKNW | AM | 1150 | C | News/Talk | Seattle-Tacoma, WA | 07/02/2003 | 11 | Hubbard Radio LLC | Seattle, WA | King |
| KNUC | FM | 98.9 | C | Country | Seattle-Tacoma, WA | 07/02/2003 | 11 | Hubbard Radio LLC | Seattle, WA | King |
| KQMV | FM | 92.5 | C | CHR | Seattle-Tacoma, WA | 07/02/2003 | 11 | Hubbard Radio LLC | Bellevue, WA | King |
| KRWM | FM | 106.9 | C | AC | Seattle-Tacoma, WA | 07/02/2003 | 11 | Hubbard Radio LLC | Bremerton, WA | Kitsap |
| KBRO | AM | 1490 | C | Span/Relgn | Seattle-Tacoma, WA | 07/02/2003 | 11 | Iglesia Pentecostal Vispera Del Fin | Bremerton, WA | Kitsap |
| KLDY | AM | 1280 | C | Span/Relgn | Seattle-Tacoma, WA | 07/02/2003 | 11 | Iglesia Pentecostal Vispera Del Fin | Lacey, WA | Thurston |
| KNTB | AM | 1480 | C | Span/Relgn | Seattle-Tacoma, WA | 07/02/2003 | 11 | Iglesia Pentecostal Vispera Del Fin | Lakewood, WA | Snohomish |
| KBKS | FM | 106.1 | C | CHR | Seattle-Tacoma, WA | 07/02/2003 | 11 | iHeartMedia Inc | Tacoma, WA | Pierce |
| KHHO | AM | 850 | C | News/Talk | Seattle-Tacoma, WA | 07/02/2003 | 11 | iHeartMedia Inc | Tacoma, WA | Pierce |
| KJAO | FM | 96.5 | C | Adult Hits | Seattle-Tacoma, WA | 07/02/2003 | 11 | iHeartMedia Inc | Seattle, WA | King |
| KJEB | FM | 95.7 | C | Clsc Hits | Seattle-Tacoma, WA | 07/02/2003 | 11 | iHeartMedia Inc | Seattle, WA | King |
| KJR | AM | 950 | C | Sports | Seattle-Tacoma, WA | 07/02/2003 | 11 | iHeartMedia Inc | Seattle, WA | King |
| KJR | FM | 93.3 | C | Sports | Seattle-Tacoma, WA | 07/02/2003 | 11 | iHeartMedia Inc | Seattle, WA | King |
| KPTR | AM | 1090 | C | Talk | Seattle-Tacoma, WA | 07/02/2003 | 11 | iHeartMedia Inc | Seattle, WA | King |
| KZOK | FM | 102.5 | C | Clsc Rock | Seattle-Tacoma, WA | 07/02/2003 | 11 | iHeartMedia Inc | Seattle, WA | King |
| KBRC | AM | 1430 | C | Clsc Rock | Seattle-Tacoma, WA | 11/03/2008 | 11 | J & J Broadcasting Inc (WA) | Mount Vernon, WA | Skagit |
| KSER | FM | 90.7 | NC | Variety | Seattle-Tacoma, WA | 07/02/2003 | 11 | KSER Foundation | Everett, WA | Snohomish |
| KXIR | FM | 89.9 | NC | Variety | Seattle-Tacoma, WA | 02/05/2014 | 11 | KSER Foundation | Freeland, WA | Island |
| KNWN | AM | 1000 | C | News | Seattle-Tacoma, WA | 07/02/2003 | 11 | Lotus Communications Corp | Seattle, WA | King |
| KNWN | FM | 97.7 | C | News | Seattle-Tacoma, WA | 04/100kwn2 | 11 | Lotus Communications Corp | Oakville, WA | Grays Harbor |
| KPLZ | FM | 101.5 | C | Hot AC | Seattle-Tacoma, WA | 07/02/2003 | 11 | Lotus Communications Corp | Seattle, WA | King |
| KVI | AM | 570 | C | Talk | Seattle-Tacoma, WA | 07/02/2003 | 11 | Lotus Communications Corp | Seattle, WA | King |
| KMIH | FM | 88.9 | NC | Rhymo/CHR | Seattle-Tacoma, WA | 07/02/2003 | 11 | Mercer Island School District #400 | Mercer Island, WA | King |
| KXPA | AM | 1540 | C | Asian/Ethnc | Seattle-Tacoma, WA | 07/02/2003 | 11 | MultiCultural Radio Broadcasting Inc | Bellevue, WA | King |
| KRPA | AM | 1110 | C | South Asian | Seattle-Tacoma, WA | 07/02/2003 | 11 | New Age Media Limited | Oak Harbor, WA | Island |
| KRXY | FM | 94.5 | C | Hot AC | Seattle-Tacoma, WA | 11/30/2009 | 11 | Olympia Broadcasters Inc | Shelton, WA | Mason |
| KGHP | FM | 89.9 | NC | AAA | Seattle-Tacoma, WA | 07/02/2003 | 11 | Peninsula School District No. 401 | Gig Harbor, WA | Pierce |
| KBLE | AM | 1050 | C | Religion | Seattle-Tacoma, WA | 07/02/2003 | 11 | Sacred Heart Radio Inc (WA) | Seattle, WA | King |
| KBUP | AM | 1240 | C | Religion | Seattle-Tacoma, WA | 07/02/2003 | 11 | Sacred Heart Radio Inc (WA) | Olympia, WA | Thurston |
| KLAY | AM | 1180 | C | Religion | Seattle-Tacoma, WA | 07/02/2003 | 11 | Sacred Heart Radio Inc (WA) | Lakewood, WA | Snohomish |

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

"p" Indicates pending sale to owner listed



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|--------------|-------|-------|--------------|-------------|--------------------|----------------------|---------------|---------------------------------|-------------------------|-------------------|
| <GNW | AM | 820 | C | Chrst/Talk | Seattle-Tacoma, WA | 07/02/2003 | 11 | Salem Media Group Inc | Burien-Seattle, WA | King |
| <KOL | AM | 1300 | C | Ethnic | Seattle-Tacoma, WA | 07/02/2003 | 11 | p Salem Media Group Inc | Seattle, WA | King |
| <LFE | AM | 1590 | C | Talk | Seattle-Tacoma, WA | 07/02/2003 | 11 | Salem Media Group Inc | Seattle, WA | King |
| <NTS | AM | 1680 | C | Mexican | Seattle-Tacoma, WA | 07/02/2003 | 11 | Salem Media Group Inc | Seattle, WA | King |
| <KMO | AM | 1360 | C | Mexcn/Sprts | Seattle-Tacoma, WA | 07/02/2003 | 11 | Sea-Mar Community Health Center | Tacoma, WA | Pierce |
| <NHC | FM | 89.5 | NC | Dance/Elect | Seattle-Tacoma, WA | 07/02/2003 | 11 | Seattle Public Schools | Seattle, WA | King |
| <RKO | AM | 1380 | C | Clsc Hits | Seattle-Tacoma, WA | 07/02/2003 | 11 | SR Broadcasting Inc | Everett, WA | Snohomish |
| <SUH | AM | 1450 | C | Korean | Seattle-Tacoma, WA | 07/02/2003 | 11 | Suh, Jean | Puyallup, WA | Pierce |
| <WYZ | AM | 1230 | C | Korean | Seattle-Tacoma, WA | 07/02/2003 | 11 | Suh, Jean | Everett, WA | Snohomish |
| <UPS | FM | 90.1 | NC | AOR | Seattle-Tacoma, WA | 07/02/2003 | 11 | University of Puget Sound | Tacoma, WA | Pierce |
| <UOW | FM | 94.9 | NC | Nws/Tlk/Inf | Seattle-Tacoma, WA | 07/02/2003 | 11 | University of Washington | Seattle, WA | King |
| <UOW | AM | 1340 | NC | Nws/Tlk/Inf | Seattle-Tacoma, WA | 07/02/2003 | 11 | University of Washington | Tumwater, WA | Thurston |
| <TDD | FM | 104.9 | C | ChrsContem | Seattle-Tacoma, WA | 07/02/2003 | 11 | W247 Broadcasting LLC | Eatonville, WA | Pierce |
| <KDZ | AM | 1250 | C | South Asian | Seattle-Tacoma, WA | 07/02/2003 | 11 | p XL Media Inc | Seattle, WA | King |
| <ZIZ | AM | 1560 | C | DARK | Seattle-Tacoma, WA | 07/02/2003 | 11 | p XL Media Inc | Pacific, WA | Pierce |

Number of Stations in Geographic Market 83

Previous Stations in Geographic Market

| | | | | | | | | | | |
|------|----|------|----|-----------|--|------------|---|-------------------------------|--------------|-------|
| <ACS | FM | 90.5 | NC | CCmp/Relg | | 08/12/2015 | 0 | Chehalis Valley Ed Foundation | Chehalis, WA | Lewis |
|------|----|------|----|-----------|--|------------|---|-------------------------------|--------------|-------|

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