

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. §73.3555(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/Altve	Seattle-Tacoma, WA	05/03/2018	11	Educational Media Foundation	Ocean Park, WA	Pacific
KAOS	FM	89.3	NC	Edtct/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	Altve/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	Rhymc/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

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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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