

COMPLIANCE WITH MULTIPLE OWNERSHIP RULES

By this application, Hero Licenseco LLC seeks to modify the license of Station KBEH(TV), Oxnard, CA(FIN: 56384) to authorize channel sharing with Station KWHY-TV, Los Angeles, CA (FIN: 26231). This operation would comply with the Commission's multiple ownership and cross ownership rules.

Hero Licenseco LLC does not own or have an attributable interest in any other radio stations, TV stations, or newspapers in the Los Angeles DMA.

As set forth in the application File No. BALCDT-20170428AAS, Hero Licenseco LLC has sought Commission consent to assign the license for Station KBEH to KWHY-22 Broadcasting, LLC ("KWHY-22"). KWHY-22 is a wholly-owned subsidiary of Meruelo Television, LLC ("Meruelo"). That proposed assignment, and channel sharing operation by the two stations, also would comply with the Commission's multiple ownership and cross ownership rules.

Meruelo Current Ownership

Television: Meruelo, through its subsidiaries, is currently the licensee of television station KWHY-TV, Los Angeles, California (FIN: 26231).

Radio: Meruelo, through its subsidiaries, is currently the licensee of two radio stations: KDEY-FM, Ontario, California (FIN: 10099) and KDAY(FM), Redondo Beach, California (FIN: 10100).

The acquisition of and channel sharing with KBEH(TV) implicates two of the Commission's multiple ownership rules:

- (1) the radio-television cross-ownership rule; and
- (2) the local television multiple ownership rule.

As demonstrated below, the acquisition/channel sharing with KBEH(TV) in the Los Angeles Market complies with the radio-television cross-ownership rule and the local television multiple ownership rule.

Radio-Television Cross Ownership

Pursuant to Section 73.3555(c) of the Commission's Rules, in a market the size of Los Angeles an entity may directly or indirectly own, operate, or control up to two commercial TV stations and six commercial radio stations if at least 20 independently owned media voices would remain in the market post-merger. *See* 47 C.F.R. § 73.3555(c)(2)(i).

As shown in the attached BIA Report TV and Radio reports, the Los Angeles market has more than 20 independently owned media voices following the proposed acquisition; accordingly, the proposed acquisition complies with the radio-television cross-ownership rule.

Local Television Multiple Ownership Rule

As noted, Meruelo owns one a television station in the Los Angeles DMA, KWHY-TV, Los Angeles, California (FIN: 26231). Therefore, as a result of this transaction, Meruelo will own two television stations in the Los Angeles DMA.

Section 73.3555(b) of the Commission's Rules permits common ownership of two television stations in the same Nielsen DMA if: (1) at least eight independently owned and operating full power commercial and/or noncommercial television stations would remain in the relevant DMA post-merger, and (2) at least one of the stations to be commonly owned is not ranked among the top four stations in the relevant DMA as measured by audience share. *See* 47 C.F.R. § 73.3555(b).

The combination of KHWY-TV and KBEH(TV) in the Los Angeles DMA complies because more than eight independent voices will remain in the market post-merger, and neither station is near being ranked in the top four stations by audience share. *See* Attached BIA market data.

Los Angeles Television Station Independent Voices

Voice	Call Sign	Channel	Affiliation	City of License	County	State	Parent	Power	HAAT	Type
1	KABC-TV	7	ABC	Los Angeles	Los Angeles	CA	ABC/Disney	141	3209	MAIN
2	KFTR-DT	46	UnM	Ontario	San Bernardino	CA	Broadcasting Media Partners Inc	2291	3137	MAIN
2	KMEX-DT	34	UNI	Los Angeles	Los Angeles	CA	Broadcasting Media Partners Inc	2291	3137	MAIN
3	KCAL-TV	9	IND	Los Angeles	Los Angeles	CA	CBS Corporation	141	3183	MAIN
	KCBS-TV	2	CBS	Los Angeles	Los Angeles	CA	CBS Corporation	36.3	3599	MAIN
4	KPXN-TV	30	ION	San Bernardino	San Bernardino	CA	CIG Media LLC	3800	2346	MAIN
5	KNBC	4	NBC	Los Angeles	Los Angeles	CA	Comcast/NBC	43.7	3229	MAIN
	KVEA	52	TEL	Corona	Riverside	CA	Comcast/NBC	2510	2976	MAIN
6	KDOC-TV	56	IND	Anaheim	Orange	CA	Ellis Communications Group LLC	2450	3041	MAIN
7	KBEH	63	IND	Oxnard	Ventura	CA	HERO Broadcasting LLC	5000	1809	MAIN
8	KCET	28	IND	Los Angeles	Los Angeles	CA	KCETLink Media Group	2450	3038	PUB
9	KOCE-TV	50	PBS	Huntington Beach	Orange	CA	KOCE-TV Foundation	2354	3114	PUB
10	KVMD	0	IND	Twentynine Palms	San Bernardino	CA	KVMD TV LLC	0	0	MAIN
11	KXLA	44	FOR	Rancho Palos Verd	Los Angeles	CA	KXLA TV 44 Inc	2340	3114	MAIN
12	KJLA	57	LAT	Ventura	Ventura	CA	LATV Holdings, LLC	5000	1739	MAIN
13	KRCA	62	EST	Riverside	Riverside	CA	Liberman Broadcasting Inc	2630	2936	MAIN
14	KLCS	58	PBS	Los Angeles	Los Angeles	CA	Los Angeles Unified School District	2570	2956	PUB
15	KWHY-TV	22	SBN	Los Angeles	Los Angeles	CA	Meruelo Media Holdings LLC	2630	2917	MAIN
16	KSCI	18	INA	Long Beach	Los Angeles	CA	NRJ TV	2583	2950	MAIN
17	KVCR-DT	24	PBS	San Bernardino	San Bernardino	CA	San Bernardino Community College District	1320	1672	PUB
18	KAZA-TV	54	AZT	Avalon	Los Angeles	CA	SCTV Inc	2290	3271	MAIN
19	KILM	64	SBN	Barstow	San Bernardino	CA	Sunbelt Television Inc	5000	1568	MAIN
20	KTLA	5	CW	Los Angeles	Los Angeles	CA	Tribune Media Company	44.7	3202	MAIN
21	KTCN-TV	40	TBN	Santa Ana	Orange	CA	Trinity Broadcasting Network Inc	631	2891	MAIN
22	KCOP-TV	13	My	Los Angeles	Los Angeles	CA	Twenty-First Century Fox Inc	161	2973	MAIN
22	KTTV	11	FOX	Los Angeles	Los Angeles	CA	Twenty-First Century Fox Inc	166	2940	MAIN
23	KVME-TV	20	Me	Bishop	Inyo	CA	Venture Technologies Group LLC	4.2	3032	MAIN

Los Angeles Radio Station Independent Voices

Voice	Call Sign	Service	City	County	State	Parent	AM Freq.	FM Freq.	Day Power	Night Power	HAAT	Class
n/a	KDIS	AM	Pasadena	Los Angeles	CA	ABC/Disney	1110	0	50	20	0	B
	KSPN	AM	Los Angeles	Los Angeles	CA	ABC/Disney	710	0	50	10	0	B
1	KGBB	FM	Edwards	Kern	CA	Adelman Broadcasting Inc	0	103.9	6	0	328	A
n/a	KLVE	FM	Los Angeles	Los Angeles	CA	Broadcasting Media Partners Inc	0	107.5	29.5	0	2999	B
	KRCD	FM	Inglewood	Los Angeles	CA	Broadcasting Media Partners Inc	0	103.9	4.1	0	387	A
	KRCV	FM	West Covina	Los Angeles	CA	Broadcasting Media Partners Inc	0	98.3	6	0	299	A
	KSCA	FM	Glendale	Los Angeles	CA	Broadcasting Media Partners Inc	0	101.9	4.8	0	2832	B
	KTNQ	AM	Los Angeles	Los Angeles	CA	Broadcasting Media Partners Inc	1020	0	50	50	0	B
2	KBPk	FM	Buena Park	Orange	CA	Buena Park School District	0	90.1	0.019	0	10	D
3	KCSN	FM	Northridge	Los Angeles	CA	California State University, Northridge	0	88.5	0.37	0	1644	B1
4	KWVE	FM	San Clemente	Orange	CA	Calvary Chapel of Costa Mesa	0	107.9	0.53	0	3793	B
5	KA EH	FM	Beaumont	Riverside	CA	Casa Media Partners LLC	0	100.9	1.5	0	479	A
6	KISL	FM	Avalon	Los Angeles	CA	Catalina Island Performing Arts Foundation	0	88.7	0.2	0	20	A
7	KBIG	FM	Los Angeles	Los Angeles	CA	CC Media Holdings Inc	0	104.3	65	0	3045	B
	KEIB	AM	Los Angeles	Los Angeles	CA	CC Media Holdings Inc	1150	0	50	44	0	B
	KFI	AM	Los Angeles	Los Angeles	CA	CC Media Holdings Inc	640	0	50	50	0	A
	KIIS	FM	Los Angeles	Los Angeles	CA	CC Media Holdings Inc	0	102.7	8	0	2959	B
	KLAC	AM	Los Angeles	Los Angeles	CA	CC Media Holdings Inc	570	0	5	5	0	B
	KOST	FM	Los Angeles	Los Angeles	CA	CC Media Holdings Inc	0	103.5	11.5	0	3114	B
	KRRL	FM	Los Angeles	Los Angeles	CA	CC Media Holdings Inc	0	92.3	43	0	2910	B
	KYSR	FM	Los Angeles	Los Angeles	CA	CC Media Holdings Inc	0	98.7	75	0	1181	B
8	KCFH	FM	Two Harbors	Los Angeles	CA	Common Frequency Inc	0	89.1	0.1	0	-106	A
9	KBRT	AM	Costa Mesa	Orange	CA	Crawford Broadcasting Company	740	0	50	0.19	0	D
10	KABC	AM	Los Angeles	Los Angeles	CA	Cumulus Media Inc	790	0	5	5	0	B
	KLOS	FM	Los Angeles	Los Angeles	CA	Cumulus Media Inc	0	95.5	63	0	3130	B
11	KTLW	FM	Lancaster	Los Angeles	CA	Educational Media Foundation	0	88.9	5.8	0	272	A
	KYLA	FM	Fountain Valley	Orange	CA	Educational Media Foundation	0	92.7	0.69	0	961	A
12	KTYM	AM	Inglewood	Los Angeles	CA	El Sembrador Ministries	1460	0	5	0.5	0	B
13	KPWR	FM	Los Angeles	Los Angeles	CA	Emmis Communications	0	105.9	25	0	3035	B
n/a	KAMP	FM	Los Angeles	Los Angeles	CA	Entercom	0	97.1	21	0	3002	B
n/a	KCBS	FM	Los Angeles	Los Angeles	CA	Entercom	0	93.1	27.5	0	3524	B
n/a	KNX	AM	Los Angeles	Los Angeles	CA	Entercom	1070	0	50	50	0	A
n/a	KROQ	FM	Pasadena	Los Angeles	CA	Entercom	0	106.7	5.6	0	1388	B
n/a	KRTH	FM	Los Angeles	Los Angeles	CA	Entercom	0	101.1	51	0	3133	B
14	KSWD	FM	Los Angeles	Los Angeles	CA	Entercom	0	100.3	5.4	0	2917	B
n/a	KTWV	FM	Los Angeles	Los Angeles	CA	Entercom	0	94.7	58	0	2832	B
15	KDLD	FM	Santa Monica	Los Angeles	CA	Entravision Communications Corp	0	103.1	3.7	0	269	A
	KDLE	FM	Newport Beach	Orange	CA	Entravision Communications Corp	0	103.1	0.3	0	965	A

Los Angeles Radio Station Independent Voices

Voice	Call Sign	Service	City	County	State	Parent	AM Freq.	FM Freq.	Day Power	Night Power	HAAT	Class
	KLYY	FM	Riverside	Riverside	CA	Entravision Communications Corp	0	97.5	72	0	1828	B
	KSSE	FM	Arcadia	Los Angeles	CA	Entravision Communications Corp	0	107.1	6	0	-43	A
16	KFRN	AM	Long Beach	Los Angeles	CA	Family Stations Incorporated	1280	0	1	1	0	B
17	KXOS	FM	Los Angeles	Los Angeles	CA	Grupo Radio Centro	0	93.9	18.5	0	3009	B
18	KLTX	AM	Long Beach	Los Angeles	CA	Hi-Favor Broadcasting LLC	1390	0	5	3.6	0	B
19	KFOX	AM	Torrance	Los Angeles	CA	HK Media Inc	1650	0	10	0.49	0	B
20	KHJ	AM	Los Angeles	Los Angeles	CA	Immaculate Heart Media Inc	930	0	5	5	0	B
21	KHTS	AM	Canyon Country	Los Angeles	CA	Jeri Lyn Broadcasting Inc	1220	0	1	0.5	0	B
22	KGBN	AM	Anaheim	Orange	CA	Korean Gospel Broadcasting Network	1190	0	20	1.3	0	B
23	KLAA	AM	Orange	Orange	CA	LAA 1 LLC	830	0	50	20	0	B
n/a	KBUA	FM	San Fernando	Los Angeles	CA	Lieberman Broadcasting Inc	0	94.3	6	0	85	A
	KBUE	FM	Long Beach	Los Angeles	CA	Lieberman Broadcasting Inc	0	105.5	3	0	466	A
	KEBN	FM	Garden Grove	Orange	CA	Lieberman Broadcasting Inc	0	94.3	6	0	240	A
	KVNR	AM	Santa Ana	Orange	CA	Lieberman Broadcasting Inc	1480	0	5	5	0	B
	KWIZ	FM	Santa Ana	Orange	CA	Lieberman Broadcasting Inc	0	96.7	6	0	203	A
24	KFWB	AM	Los Angeles	Los Angeles	CA	Lotus Communications Corp	980	0	5	5	0	B
	KIRN	AM	Simi Valley	Ventura	CA	Lotus Communications Corp	670	0	5	3	0	B
	KTMZ	AM	Pomona	Los Angeles	CA	Lotus Communications Corp	1220	0	0.25	0.25	0	B
	KWKW	AM	Los Angeles	Los Angeles	CA	Lotus Communications Corp	1330	0	5	5	0	B
25	KXLU	FM	Los Angeles	Los Angeles	CA	Loyola Marymount University	0	88.9	2.9	0	10	A
n/a	KDAY	FM	Redondo Beach	Los Angeles	CA	Meruelo Media Holdings LLC	0	93.5	4.2	0	384	A
26	KKGO	FM	Los Angeles	Los Angeles	CA	Mount Wilson FM Broadcasters Inc	0	105.1	18	0	2887	B
	KKJZ	FM	Long Beach	Los Angeles	CA	Mount Wilson FM Broadcasters Inc	0	88.1	30	0	449	B
	KPCC	FM	Pasadena	Los Angeles	CA	Mount Wilson FM Broadcasters Inc	0	89.3	0.6	0	2923	B
	KSUR	AM	Beverly Hills	Los Angeles	CA	Mount Wilson FM Broadcasters Inc	1260	0	20	7.5	0	B
27	KSAK	FM	Walnut	Los Angeles	CA	Mt. San Antonio Community College District	0	90.1	0.002	0	541	D
28	KAHZ	AM	Pomona	Los Angeles	CA	MultiCultural Broadcasting	1600	0	5	5	0	B
	KALI	AM	West Covina	Los Angeles	CA	MultiCultural Broadcasting	900	0	5	0.15	0	D
	KALI	FM	Santa Ana	Orange	CA	MultiCultural Broadcasting	0	106.3	6	0	302	A
	KAZN	AM	Pasadena	Los Angeles	CA	MultiCultural Broadcasting	1300	0	23	4.2	0	B
	KBLA	AM	Santa Monica	Los Angeles	CA	MultiCultural Broadcasting	1580	0	50	50	0	B
	KMRB	AM	San Gabriel	Los Angeles	CA	MultiCultural Broadcasting	1430	0	50	9.8	0	B
29	KMPC	AM	Los Angeles	Los Angeles	CA	P&Y Broadcasting Corporation	1540	0	50	37	0	B
30	KPFK	FM	Los Angeles	Los Angeles	CA	Pacifica Foundation, Inc	0	90.7	110	0	2832	B
31	KGMX	FM	Lancaster	Los Angeles	CA	Point Broadcasting Company	0	106.3	3	0	135	A
	KOSS	AM	Lancaster	Los Angeles	CA	Point Broadcasting Company	1380	0	1	0.02	0	D
	KUTY	AM	Palmdale	Los Angeles	CA	Point Broadcasting Company	1470	0	5	5	0	B
32	KSPC	FM	Claremont	Los Angeles	CA	Pomona College Radio Station	0	88.7	0.4	0	69	A

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Voice	Call Sign	Service	City	County	State	Parent	AM Freq.	FM Freq.	Day Power	Night Power	HAAT	Class
33	KAVL	AM	Lancaster	Los Angeles	CA	RZ Radio LLC	610	0	4.9	4	0	B
34	KFSH	FM	La Mirada	Los Angeles	CA	Salem Media Group Inc	0	95.9	6	0	328	A
	KKLA	FM	Los Angeles	Los Angeles	CA	Salem Media Group Inc	0	99.5	10	0	2959	B
	KRLA	AM	Glendale	Los Angeles	CA	Salem Media Group Inc	870	0	50	3	0	B
35	KCRW	FM	Santa Monica	Los Angeles	CA	Santa Monica Comm College	0	89.9	6.9	0	1109	B
	KCRY	FM	Mojave	Kern	CA	Santa Monica Comm College	0	88.1	10.5	0	-95	B1
36	KSBR	FM	Mission Viejo	Orange	CA	South Orange County Community College District	0	88.5	0.6	0	600	A
37	KLAX	FM	East Los Angeles	Los Angeles	CA	Spanish Broadcasting System	0	97.9	33	0	604	B
	KXOL	FM	Los Angeles	Los Angeles	CA	Spanish Broadcasting System	0	96.3	6.6	0	1306	B
38	KJLH	FM	Compton	Los Angeles	CA	Taxi Productions Inc	0	102.3	5.6	0	338	A
39	KUCI	FM	Irvine	Orange	CA	University of California Regents	0	88.9	0.2	0	-10	A
40	KDSC	FM	Thousand Oaks	Ventura	CA	University of Southern California	0	91.1	4.8	0	1280	B
	KPSC	FM	Palm Springs	Riverside	CA	University of Southern California	0	88.5	1.6	0	591	A
	KUSC	FM	Los Angeles	Los Angeles	CA	University of Southern California	0	91.5	39	0	2923	B
41	KYPA	AM	Los Angeles	Los Angeles	CA	Woori Media Group LLC	1230	0	1	1	0	C