

Multiple Ownership Compliance Analysis

The parties to this application, through SummitMedia and its licensee subsidiaries listed below (collectively, “SummitMedia”),¹ have attributable interests in 6 full-power broadcast stations which are listed as “home” to the Honolulu, HI Market (“Honolulu Market”) by BIA:

<u>Licensee</u>	<u>Station</u>	<u>Type</u>	<u>Community of License</u>	<u>State</u>	<u>Facility ID No.</u>
SM-KCCN, LLC	KCCN-FM	FM	Honolulu	HI	34552
SM-KINE, LLC	KINE-FM	FM	Honolulu	HI	34553
SM-KKNE, LLC	KKNE	AM	Waipahu	HI	14937
SM-KPHW, LLC	KPHW	FM	Kaneohe	HI	27424
SM-KRTR-AM, LLC	KPRP	AM	Honolulu	HI	13880
SM-KRTR-FM, LLC	KRTR-FM	FM	Kailua	HI	50118

SummitMedia does not hold attributable interests in any other station in the Honolulu Market.

As shown in the BIA Market Report for the Honolulu Market attached hereto, the market is currently home to 41 full-power broadcast stations. Section 73.3555(a)(1)(ii) of the Commission’s rules provides that, in a radio market with between 30 and 44 (inclusive) full-power, commercial and noncommercial radio stations, a party may hold attributable interests in 7 full-power commercial and non-commercial broadcast stations located in the same market – no more than 4 of which are in the same service.²

SummitMedia is currently in compliance with the FCC’s multiple ownership limits for the Honolulu Market because SummitMedia currently has attributable interests in only 6 full-power broadcast stations in the market – of which 4 are in the FM service, and 2 are in the AM service. Furthermore, following the closing the transaction contemplated in this application, SummitMedia will remain in compliance with the FCC’s ownership limits for the Honolulu Market as the stations in that market in which it has attributable interests will remain unchanged. For these reasons, SummitMedia is currently, and will remain in compliance with the FCC’s multiple ownership rules.

¹ See Changes in Ownership and Other Authorizations Exhibits.

² 47 C.F.R. § 73.3555(a)(1)(ii).

FCC Geographic Market Definition for Honolulu, HI

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KAIM	FM	95.5	C	ChrsContem	Honolulu, HI	07/02/2003	65	Salem Media Group Inc	Honolulu, HI	Honolulu
KCCN	FM	100.3	C	Hwain/Regg	Honolulu, HI	07/02/2003	65	SummitMedia LLC	Honolulu, HI	Honolulu
KDDB	FM	102.7	C	Rhymc/CHR	Honolulu, HI	07/02/2003	65	Pacific Radio Group Inc	Waipahu, HI	Honolulu
KDNN	FM	98.5	C	Hwain/Regg	Honolulu, HI	07/02/2003	65	iHeartMedia Inc	Honolulu, HI	Honolulu
KGU	AM	760	C	Country	Honolulu, HI	07/02/2003	65	Salem Media Group Inc	Honolulu, HI	Honolulu
KGU	FM	99.5	C	Chrst/Talk	Honolulu, HI	07/02/2003	65	Salem Media Group Inc	Honolulu, HI	Honolulu
KHCM	AM	880	C	Asn/Krn/Jap	Honolulu, HI	07/02/2003	65	Salem Media Group Inc	Honolulu, HI	Honolulu
KHCM	FM	97.5	C	Country	Honolulu, HI	07/02/2003	65	Salem Media Group Inc	Honolulu, HI	Honolulu
KHKA	AM	1500	C	Sports	Honolulu, HI	07/02/2003	65	Blow Up LLC	Honolulu, HI	Honolulu
KHNR	AM	690	C	News/Talk	Honolulu, HI	07/02/2003	65	Salem Media Group Inc	Honolulu, HI	Honolulu
KHPH	FM	88.7	NC	News/Talk	Honolulu, HI	03/19/2013	65	Hawaii Public Radio Inc	Kailua, HI	Honolulu
KHPR	FM	88.1	NC	News/Talk	Honolulu, HI	07/02/2003	65	Hawaii Public Radio Inc	Honolulu, HI	Honolulu
KHVH	AM	830	C	News/Talk	Honolulu, HI	07/02/2003	65	iHeartMedia Inc	Honolulu, HI	Honolulu
KHXM	AM	1370	C	Rock	Honolulu, HI	07/02/2003	65	Hochman Hawaii	Pearl City, HI	Honolulu
KIKI	AM	990	C	Sports	Honolulu, HI	07/02/2003	65	iHeartMedia Inc	Honolulu, HI	Honolulu
KINE	FM	105.1	C	Hwain/AC	Honolulu, HI	07/02/2003	65	SummitMedia LLC	Honolulu, HI	Honolulu
KIPO	FM	89.3	NC	Classical	Honolulu, HI	07/02/2003	65	Hawaii Public Radio Inc	Honolulu, HI	Honolulu
KKEA	AM	1420	C	Sports	Honolulu, HI	07/02/2003	65	Blow Up LLC	Honolulu, HI	Honolulu
KKNE	AM	940	C	Hawaiian	Honolulu, HI	07/02/2003	65	SummitMedia LLC	Waipahu, HI	Honolulu
KKOL	FM	107.9	C	Oldies	Honolulu, HI	07/02/2003	65	Salem Media Group Inc	Aiea, HI	Honolulu
KLHT	AM	1040	C	Chrst/Talk	Honolulu, HI	07/02/2003	65	Calvary Chapel of Honolulu Inc	Honolulu, HI	Honolulu
KLHT	FM	91.5	NC	Chrst/Talk	Honolulu, HI	06/16/2016	65	Calvary Chapel of Honolulu Inc	Honolulu, HI	Honolulu
KLUU	FM	103.5	NC	ChrsContem	Honolulu, HI	09/30/2005	65	Educational Media Foundation	Wahiawa, HI	Honolulu
KNAN	FM	106.7	C	CHR	Honolulu, HI	07/16/2009	65	Big D Consulting Inc	Nanakuli, HI	Honolulu
KNDI	AM	1270	C	Ethnc/Relgn	Honolulu, HI	07/02/2003	65	Geronimo Bdcstg LLC	Honolulu, HI	Honolulu
KORL	FM	101.1	C	Oldies	Honolulu, HI	06/12/2006	65	Hochman Hawaii	Waianae, HI	Honolulu
KPHI	AM	1130	C	Asian/AC	Honolulu, HI	09/25/2008	65	Hochman Hawaii	Honolulu, HI	Honolulu
KPHW	FM	104.3	C	CHR/Rhymc	Honolulu, HI	07/02/2003	65	SummitMedia LLC	Kaneohe, HI	Honolulu
KPOI	FM	105.9	C	Soft AC	Honolulu, HI	07/02/2003	65	Pacific Radio Group Inc	Honolulu, HI	Honolulu
KPRP	AM	650	C	Ethnic	Honolulu, HI	07/02/2003	65	SummitMedia LLC	Honolulu, HI	Honolulu
KQMQ	FM	93.1	C	Hwain/Regg	Honolulu, HI	07/02/2003	65	Pacific Radio Group Inc	Honolulu, HI	Honolulu
KREA	AM	1540	C	Korean	Honolulu, HI	07/02/2003	65	JMK Communications Inc	Honolulu, HI	Honolulu
KRTR	FM	96.3	C	Bright AC	Honolulu, HI	07/02/2003	65	SummitMedia LLC	Kailua, HI	Honolulu
KSSK	AM	590	C	AC	Honolulu, HI	07/02/2003	65	iHeartMedia Inc	Honolulu, HI	Honolulu

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

"p" indicates pending sale to owner listed

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Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KSSK	FM	92.3	C AC		Honolulu, HI	07/02/2003	65	iHeartMedia Inc	Waipahu, HI	Honolulu
KTUH	FM	90.1	NC Educational		Honolulu, HI	07/02/2003	65	University of Hawaii	Honolulu, HI	Honolulu
KUBT	FM	93.9	C HpHop/Rhy		Honolulu, HI	07/02/2003	65	iHeartMedia Inc	Honolulu, HI	Honolulu
KUCD	FM	101.9	C Alternative		Honolulu, HI	07/02/2003	65	iHeartMedia Inc	Pearl City, HI	Honolulu
KUMU	FM	94.7	C Rhymc/AC		Honolulu, HI	07/02/2003	65	Pacific Radio Group Inc	Honolulu, HI	Honolulu
KWAI	AM	1080	C DARK		Honolulu, HI	07/02/2003	65	Wagenvoord Advertising Group Inc	Honolulu, HI	Honolulu
KZOO	AM	1210	C Japanese		Honolulu, HI	07/02/2003	65	Polynesian Broadcasting Inc	Honolulu, HI	Honolulu

Number of Stations in Geographic Market 41

Previous Stations in Geographic Market