

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 |
| KDDDB | 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

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 |
|-----------------|-----------|-------|-----------------|-------------|--------------|----------------------------|---------------------|----------------------------------|----------------------------|----------------------|
| 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