

### Statement Regarding License Renewal Applications

On August 2, 2021, W. Lawrence Patrick, Receiver (“Assignor”), filed license renewal applications for KREV(FM), Alameda, CA (Fac. ID 36029) and KRCK-FM, Mecca, CA (Fac. ID 52808), two of the three stations VCY America, Inc. (“Assignee”) proposed to acquire in the instant application. A license renewal application was filed for KFRH(FM), North Las Vegas, Nevada (Fac. ID 19062) on June 1, 2021.

In *Stockholders of CBS Inc.*, 11 FCC Rcd 3733 (1995), the Commission held, and established the precedent, that it may consider and act on an application for the acquisition of multiple broadcast stations, notwithstanding the pendency of an application for renewal of license of one or more of the stations subject to the transaction. *See also In re Applications of SFX Broadcasting, Inc. and SBI Holding Corp.*, 13 FCC Rcd 12370 (MB 1998) (applying *Stockholders of CBS* to audio transaction); *Quincy Newspapers, Inc., Letter to Counsel*, 30 FCC Rcd. 9987, 9993 (MB Vid. Div. 2015) (applying *Stockholders of CBS* to approve multi-station transaction).

It is respectfully requested that the Commission process the instant application in the normal course pursuant to the procedures established in the *CBS* decision. In furtherance of this request, Assignee hereby agrees to succeed to the position of Assignor with respect to the KREV(FM) and KRCK-FM renewal applications if they remain pending upon consummation of the transaction. Assignee previously agreed to succeed to the position of Assignor with respect to KFRH(FM). Notwithstanding the efforts of Petitioners Royce International Broadcasting Corporation and Silver State Broadcasting, Inc. to characterize their substantive arguments as basic qualification issues, no legitimate basic qualification issues have been raised against Assignor or Assignee and the issues raised by the Petitioners should be resolved in the Assignor’s and Assignee’s favor.