

**MULTIPLE OWNERSHIP**

VCY America, Inc. ("VCY") is the licensee of non-commercial educational stations KVCS(FM), Fac. ID 172375, Spring Valley, MN; WQRM(AM), Fac. ID 74191, Duluth, MN; WQRN(FM), Fac. ID 172378, Cook, MN; KVCJ(FM), Fac. ID 173311, Montezuma, IA; WVCJ(FM), Fac. ID 73038, Eau Claire, WI; WVCS(FM), Fac. ID 175594, Owen, WI; WVCX(FM), Fac. ID 73061, Tomah, WI; WVCY(AM), Fac. ID 69836, Oshkosh, WI; WVCY-FM, Fac. ID 73059, Milwaukee, WI; WVFL(FM), Fac. ID 91710, Fond Du Lac, WI; and WVRN(FM), Fac. ID 91400, Wittenberg, WI. In addition, VCY's wholly owned subsidiary, Keweenaw Bay Broadcasting, Inc., is the licensee of WEGZ(FM), Fac. ID 15972, Washburn, WI. Any overlap of the contours of these stations with the station that is the subject of the instant application would not be considered for purposes of 47 C.F.R § 73.3555(a). VCY is also the proposed licensee of KTIA-FM, Fac. ID 6417, Huxley, IA. *See* LMS File No. 0000153443. VCY has filed an application to convert the license of KTIA-FM to non-commercial educational upon consummation of the transaction. Accordingly, any overlap between KTIA-FM and the station that is the subject of the instant application would not be considered for purposes of 47 C.F.R § 73.3555(a). Finally, VCY is the licensee of commercial station WVCY-TV, Fac. ID 72342, Milwaukee, WI, which it operates on a non-commercial basis. The FCC has eliminated its radio/television cross-ownership rule.