

**TECHNICAL STATEMENT
LOCAL RADIO OWNERSHIP ANALYSIS
LOTUS SACRAMENTO CORP.**

Lotus Sacramento Corp., a California corporation (“Lotus Sacramento”), is a wholly owned subsidiary of Lotus Communications Corp., a California corporation (collectively with Lotus Sacramento, the “Assignee”). This technical statement provides information in support of an application for Commission consent to the assignment of license for radio station KSAC-FM in Dunnigan, CA, Facility ID No. 51220. KSAC-FM is reported by BIA Advisory Services to be a “home” station in the Sacramento, CA Market and also its community of license is located within the associated radio metro boundaries based on the current Nielsen geographic market definitions. In this radio metro, the Assignee presently owns and operates the following home stations:

Table 1

PRESENT CO-OWNED STATIONS					
No.	Call	Freq.		City, State	Fac. ID
1	KVMX(AM)	890	kHz	Olivehurst, CA	160999
2	KVMX-FM	92.1	MHz	Placerville, CA	36028

As the *FCC Geographic Market Definition for Sacramento, CA* shown in Figure 1 indicates, there are a total of 51 radio stations in the metro. The local radio ownership rule in 47 CFR §73.3555(a)(1)(i) indicates that in a radio market with 45 or more commercial and noncommercial radio stations, it is permissible for entities under common control to hold a cognizable interest in up to eight commercial radio stations, not more than five stations in the same service. The table below lists the proposed co-owned stations. Given the fact that the Assignee will have an interest in a total of three commercial stations, one AM station and two FM stations, the Assignee’s application is in full compliance with Section 73.3555(a) of the Commission’s Rules concerning local radio ownership.

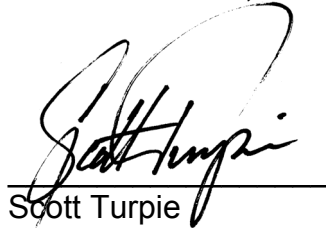


Table 2

PROPOSED CO-OWNED STATIONS				
No.	Call	Freq.	City, State	Fac. ID
1	KVMX(AM)	890 kHz	Olivehurst, CA	160999
2	KVMX-FM	92.1 MHz	Placerville, CA	36028
3	KSAC-FM	105.5 MHz	Dunnigan, CA	51220

Therefore, it has been fully demonstrated under the Nielsen Metro Methodology that the Assignee is eligible to own and operate up to eight commercial stations, not more than five in the same service, in accordance with 47 CFR §73.3555(a)(1)(i). Aside from the stations listed above, neither the Assignee, nor any of its principals hold other radio broadcast interests in the region that would require further evaluation of compliance under the local radio ownership rule.

Respectfully submitted,
Lohnes & Culver, LLC



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Attachment
Figure 1 – FCC Geographic Market Definition for Sacramento, CA

FCC Geographic Market Definition for Sacramento, CA

FIGURE 1

Call Letters	AM/FM	Type		Home Market	Market		Owner	City & State of License		County of License
		Freq	Station		Designn Date	Home Mkt Rank				
KIFM	AM	1320	C	Sports	07/02/2003	28	Audacy	West Sacramento, CA	Yolo	
KKDO	FM	94.7	C	Alternative	07/02/2003	28	Audacy	Fair Oaks, CA	Sacramento	
KFRQ	FM	98.5	C	AOR	07/02/2003	28	Audacy	Sacramento, CA	Sacramento	
KSEG	FM	96.9	C	Clisc Rock	07/02/2003	28	Audacy	Sacramento, CA	Sacramento	
KSFM	FM	102.5	C	Rhymc/CHR	07/02/2003	28	Audacy	Woodland, CA	Yolo	
KUDL	FM	106.5	C	CHR	07/02/2003	28	Audacy	Sacramento, CA	Sacramento	
KHTK	AM	1140	C	Sprts/Talk	07/02/2003	28	Bonneville International Corporation	Sacramento, CA	Sacramento	
KNCI	FM	105.1	C	Country	07/02/2003	28	Bonneville International Corporation	Sacramento, CA	Sacramento	
KYMX	FM	96.1	C	AC	07/02/2003	28	Bonneville International Corporation	Sacramento, CA	Sacramento	
KZZO	FM	100.5	C	Hot AC	07/02/2003	28	Bonneville International Corporation	Sacramento, CA	Sacramento	
KXJZ	FM	90.9	NC	Nws/Tlk/Inf	07/02/2003	28	California State University Sacramento	Sacramento, CA	Sacramento	
KXPR	FM	88.9	NC	Clisc/Jazz	07/02/2003	28	California State University Sacramento	Sacramento, CA	Sacramento	
KRPV	AM	1210	NC	South Asian	07/02/2003	28	Dabaj LLC	Rocklin, CA	Placer	
KLVB	FM	99.5	NC	ChrsContem	07/02/2003	28	Educational Media Foundation	Citrus Heights, CA	Sacramento	
KHHM	FM	101.9	C	CHR/SpnAC	07/02/2003	28	Entravision Communications Corp	Shingle Springs, CA	El Dorado	
KNTY	FM	103.5	C	Country	07/02/2003	28	Entravision Communications Corp	Sacramento, CA	Sacramento	
KRCX	FM	99.9	C	Mexican	07/02/2003	28	Entravision Communications Corp	Marysville, CA	Yuba	
KXSE	FM	104.3	C	Grupr/Cmbia	07/02/2003	28	Entravision Communications Corp	Davis, CA	Yolo	
KEBR	FM	88.1	NC	Religion	07/02/2003	28	Family Stations Incorporated	Sacramento, CA	Sacramento	
KBEB	FM	92.5	C	Soft AC	07/02/2003	28	iHeartMedia Inc	Sacramento, CA	Sacramento	
KFBK	AM	1530	C	News/Talk	07/02/2003	28	iHeartMedia Inc	Sacramento, CA	Sacramento	
KFBK	FM	93.1	C	News/Talk	11/13/2009	28	iHeartMedia Inc	Pollock Pines, CA	El Dorado	
KHYL	FM	101.1	C	HpHop/R&B	07/02/2003	28	iHeartMedia Inc	Auburn, CA	Placer	
KSTE	AM	650	C	Talk	07/02/2003	28	iHeartMedia Inc	Rancho Cordova, CA	Sacramento	
KYRV	FM	93.7	C	Clisc Rock	07/02/2003	28	iHeartMedia Inc	Roseville, CA	Placer	
KZIS	FM	107.9	C	90s & 2000s	07/02/2003	28	iHeartMedia Inc	Sacramento, CA	Sacramento	
KJAY	AM	1430	C	Ethnc/Intl	07/02/2003	28	KJAY LLC	Sacramento, CA	Sacramento	
KQEI	FM	89.3	NC	Nws/Tlk/Inf	07/02/2003	28	KQED Inc	North Highlands, CA	Sacramento	
KBAA	FM	103.3	C	SpnAC/Reg	07/02/2003	28	Lazer Broadcasting Corporation	Grass Valley, CA	Nevada	
KCCL	FM	101.5	C	SpnAC/Reg	07/01/2013	28	Lazer Broadcasting Corporation	Woodland, CA	Yolo	
KGRB	FM	94.3	C	Mexican	01/19/2004	28	Lazer Broadcasting Corporation	Jackson, CA	Amador	
KLMG	FM	97.9	C	SpnAC/Reg	07/02/2003	28	Lazer Broadcasting Corporation	Esparto, CA	Yolo	
KVMX	FM	92.1	C	Ranchera	07/01/2013	28	Lotus Communications Corp	Placerville, CA	El Dorado	
KVMX	AM	890	C	Ranchera	03/28/2017	28	Lotus Communications Corp	Olivehurst, CA	Yuba	

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

"P" indicates pending sale to owner listed

FCC Geographic Market Definition for Sacramento, CA

FIGURE 1

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market			City & State of License	County of License
							Designn Date	Home Mkt Rank	Owner		
KFSG	AM	1690	C	Ethnc/Varty	Sacramento, CA		07/02/2003	28	MultiCultural Radio Broadcasting Inc	Roseville, CA	Placer
KLIB	AM	1110	C	Ethnc/Varty	Sacramento, CA		07/02/2003	28	MultiCultural Radio Broadcasting Inc	Roseville, CA	Placer
KGPC	FM	88.3	NC	Variety	Sacramento, CA		09/26/2005	28	Nevada City Community Broadcast Group	Camino, CA	El Dorado
KVMR	FM	89.5	NC	Variety	Sacramento, CA		07/02/2003	28	Nevada City Community Broadcast Group	Nevada City, CA	Nevada
KNCO	AM	830	C	News/Talk	Sacramento, CA		07/02/2003	28	Nevada County Broadcasters	Grass Valley, CA	Nevada
KNCO	FM	94.1	C	AC	Sacramento, CA		07/02/2003	28	Nevada County Broadcasters	Grass Valley, CA	Nevada
KIID	AM	1470	C	South Asian	Sacramento, CA		07/02/2003	28	Punjabi American Media LLC	Sacramento, CA	Sacramento
KCVV	AM	1240	C	Span/Relgn	Sacramento, CA		07/02/2003	28	Radio Santisimo Sacramento Inc	Sacramento, CA	Sacramento
KPYV	AM	1340	NC	Span/Relgn	Sacramento, CA		07/02/2003	28	Radio Santisimo Sacramento Inc	Oroville, CA	Butte
KAHI	AM	950	C	Nws/Tlk/Spt	Sacramento, CA		07/02/2003	28	Relevant Radio Inc	Auburn, CA	Placer
KSMH	AM	1620	NC	Religion	Sacramento, CA		07/02/2003	28	Relevant Radio Inc	West Sacramento, CA	Yolo
KFIA	AM	710	C	Chrst/Talk	Sacramento, CA		07/02/2003	28	Salem Media Group Inc	Carmichael, CA	Sacramento
KKFS	FM	103.9	C	ChrsContem	Sacramento, CA		07/02/2003	28	Salem Media Group Inc	Lincoln, CA	Placer
KSAC	FM	105.5	C	Bus News	Sacramento, CA		07/02/2003	28	Salem Media Group Inc	Dunnigan, CA	Yolo
KTZK	AM	1380	C	News/Talk	Sacramento, CA		07/02/2003	28	Salem Media Group Inc	Sacramento, CA	Sacramento
KYDS	FM	91.5	NC	Eclectic	Sacramento, CA		07/02/2003	28	San Juan Unified School District	Sacramento, CA	Sacramento
KDVS	FM	90.3	NC	Eclectic	Sacramento, CA		07/02/2003	28	University of California Regents	Davis, CA	Yolo

Number of Stations in Geographic Market 51

Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed