

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

Arizona Lotus Corp., an Arizona corporation (“Arizona Lotus”), is a wholly owned subsidiary of Lotus Communications Corp., a California corporation (collectively with Arizona Lotus, the “Assignee”). This technical statement provides information in support of an application for Commission consent to the assignment of license for radio stations KFFN(AM), KMXZ(FM), KQTH(FM) in Tucson, Arizona and KTGv(FM) in Oracle, Arizona, which all operate in the same radio market. Because the Assignee already has cognizable interest in one AM station and three FM stations in that market, it further seeks to simultaneously divest all interest in KQTH(FM) and KTGv(FM) to comply with the Commission’s Rules concerning local radio ownership.

The Assignee currently owns and operates the following four radio stations that are listed by BIA Kelsey as “home” to the Tucson, Arizona, Nielsen Audio Metro:

**PRESENT CO-OWNED STATIONS**

No.	Call	Freq.	City, State	Fac. ID
1	KTKT(AM)	990 kHz	Tucson, AZ	2744
2	KCMT(FM)	92.1 MHz	Green Valley, AZ	2746
3	KLPX(FM)	96.1 MHz	Tucson, AZ	2745
4	KFMA(FM)	102.1 MHz	Oro Valley, AZ	87841

As stated above, the Assignee is seeking to acquire KFFN(AM), KMXZ(FM), KQTH(FM) and KTGv(FM) and simultaneously divest its interest in KQTH(FM) and KTGv(FM). Arizona Lotus has executed an Asset Purchase Agreement for



KQTH(FM) with Family Life Broadcasting, Inc., an Arizona not-for-profit corporation, and an Asset Purchase Agreement for KTGTV(FM) with Bustos Media Holdings, LLC, a California limited liability company, and is submitting an FCC assignment application for each of these transactions concurrently with this application. Upon receiving Commission approval and simultaneously closing these transactions, the Assignee will control six commercial stations in the market – four FM stations and two AM stations. The following table lists the proposed co-owned stations:

PROPOSED CO-OWNED STATIONS					
No.	Call	Freq.		City, State	Fac. ID
1	KTKT(AM)	990	kHz	Tucson, AZ	2744
2	KFFN(AM)	1490	kHz	Tucson, AZ	2433
3	KCMT(FM)	92.1	MHz	Green Valley, AZ	2746
4	KMXZ(FM)	94.9	MHz	Tucson, AZ	2434
5	KLPX(FM)	96.1	MHz	Tucson, AZ	2745
6	KFMA(FM)	102.1	MHz	Oro Valley, AZ	87841

Aside from the stations listed above, neither the Assignee, nor any of its principals have any radio broadcast interests in the region that require an evaluation of compliance under the local radio ownership rule.

Figure 1 shows the “*FCC Geographic Market Definition for Tucson, AZ*” reported by BIA Kelsey. It indicates that there are 41 stations in the market based on the Nielsen Audio Metro Methodology (formerly known as the Arbitron Metro Methodology). Section 73.3555(a)(1)(ii) of the Commission’s Rules provides that in a radio market with between 30 and 44 commercial and noncommercial radio stations, it is permissible for a party to have a cognizable interest in up to seven commercial radio stations, not more than four stations in the same service. Given the fact that the Assignee will have an interest in a total of six commercial stations and the count of stations in the market is 41, the



Assignee's application is in full compliance with Section 73.3555(a) of the Commission's Rules concerning local radio ownership.

Respectfully submitted,  
Lohnes and Culver LLC

A handwritten signature in black ink, appearing to read 'Scott Turpie', written over a horizontal line.

Scott Turpie  
Technical Consultant  
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Attachment  
Figure 1 – FCC Geographic Market Definition for Tucson, AZ

FCC Geographic Market Definition for Tucson, AZ

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Designn Date	Home Mkt Rank	Owner	City & State of License	County of License
KAIC	FM	88.9	NC	CCtmp/Educ	Tucson, AZ	07/02/2003	62	Calvary Chapel of Tucson Inc	Tucson, AZ	Pima
KCEE	AM	690	C	Adlt Stndrd	Tucson, AZ	07/02/2003	62	Good News Radio Broadcasting Inc	Tucson, AZ	Pima
KCMT	FM	92.1	C	Mexican	Tucson, AZ	07/02/2003	62	Lotus Communications Corp	Green Valley, AZ	Pima
KCUB	AM	1290	C	Sprts/Talk	Tucson, AZ	07/02/2003	62	Cumulus Media Holdings Inc	Tucson, AZ	Pima
KEVT	AM	1210	C	Talk	Tucson, AZ	07/02/2003	62	One Mart Corp	Sahuarita, AZ	Pima
KFFN	AM	1490	C	Sprts/Talk	Tucson, AZ	07/02/2003	62	EW Scripps Co	Tucson, AZ	Pima
KFLT	AM	830	NC	Inspr/Chrst	Tucson, AZ	07/02/2003	62	Family Life Broadcasting System	Tucson, AZ	Pima
KFLT	FM	88.5	NC	Inspr/Chrst	Tucson, AZ	09/02/2005	62	Family Life Broadcasting System	Tucson, AZ	Pima
KFMA	FM	102.1	C	Alvte/NwRck	Tucson, AZ	07/02/2003	62	Lotus Communications Corp	Oro Valley, AZ	Pima
KGMS	AM	940	C	Chrst/Talk	Tucson, AZ	07/02/2003	62	Good News Radio Broadcasting Inc	Tucson, AZ	Pima
KGYY	AM	1080	C	Clsc Hits	Tucson, AZ	07/02/2003	62	KGYY LLC	Green Valley, AZ	Pima
KHIL	AM	1250	C	Country	Tucson, AZ	03/26/2015	62	Willcox Radio LLC	Willcox, AZ	Cochise
KHYT	FM	107.5	C	Clsc Hits	Tucson, AZ	07/02/2003	62	Cumulus Media Holdings Inc	Tucson, AZ	Pima
KIIM	FM	99.5	C	Country	Tucson, AZ	07/02/2003	62	Cumulus Media Holdings Inc	Tucson, AZ	Pima
KKYZ	FM	101.7	C	Oldies	Tucson, AZ	09/19/2005	62	Cochise Broadcasting LLC	Sierra Vista, AZ	Cochise
KLPX	FM	96.1	C	Clsc Rock	Tucson, AZ	07/02/2003	62	Lotus Communications Corp	Tucson, AZ	Pima
KMIY	FM	92.9	C	Hot AC	Tucson, AZ	07/02/2003	62	iHeartMedia	Tucson, AZ	Pima
KMXZ	FM	94.9	C	AC	Tucson, AZ	07/02/2003	62	EW Scripps Co	Tucson, AZ	Pima
KNST	AM	790	C	News/Talk	Tucson, AZ	07/02/2003	62	iHeartMedia	Tucson, AZ	Pima
KOHN	FM	91.9	NC	Ethnic	Tucson, AZ	01/27/2005	62	Tohono O'Odham Nation	Sells, AZ	Pima
KOHT	FM	98.3	C	HpHop/Rhy	Tucson, AZ	07/02/2003	62	iHeartMedia	Marana, AZ	Pima
KQTH	FM	104.1	C	News/Talk	Tucson, AZ	07/02/2003	62	EW Scripps Co	Tucson, AZ	Pima
KRDX	FM	98.5	C	Oldies	Tucson, AZ	02/05/2004	62	Desert West Air Ranchers Corp	Vail, AZ	Pima
KRQQ	FM	93.7	C	CHR	Tucson, AZ	07/02/2003	62	iHeartMedia	Tucson, AZ	Pima
KSAZ	AM	580	C	Span/Relgn	Tucson, AZ	07/02/2003	62	KASA Radio Hogar Inc	Marana, AZ	Pima
KSZR	FM	97.5	C	CHR	Tucson, AZ	07/02/2003	62	Cumulus Media Holdings Inc	Oro Valley, AZ	Pima
KTGV	FM	106.3	C	AC	Tucson, AZ	07/02/2003	62	EW Scripps Co	Oracle, AZ	Pinal
KTKT	AM	990	C	Span/AdHts	Tucson, AZ	07/02/2003	62	Lotus Communications Corp	Tucson, AZ	Pima
KTUC	AM	1400	C	Adlt Stndrd	Tucson, AZ	07/02/2003	62	Cumulus Media Holdings Inc	Tucson, AZ	Pima
KTZR	AM	1450	C	Sports	Tucson, AZ	07/02/2003	62	iHeartMedia	Tucson, AZ	Pima
KUAT	FM	90.5	NC	Classical	Tucson, AZ	07/02/2003	62	University of Arizona Board of Regents	Tucson, AZ	Pima
KUAZ	AM	1550	NC	NPR/Jazz	Tucson, AZ	07/02/2003	62	University of Arizona Board of Regents	Tucson, AZ	Pima
KUAZ	FM	89.1	NC	NPR/Jazz	Tucson, AZ	07/02/2003	62	University of Arizona Board of Regents	Tucson, AZ	Pima
KVOI	AM	1030	C	News/Talk	Tucson, AZ	07/02/2003	62	Good News Radio Broadcasting Inc	Cortaro, AZ	Pima

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

"p" indicates pending sale to owner listed



# FCC Geographic Market Definition for Tucson, AZ

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KWCX	FM	104.9	C		Rhymc/CHR	Tucson, AZ	09/03/2009	62	KZLZ LLC	Willcox, AZ	Cochise
KWFM	AM	1330	C		News/Talk	Tucson, AZ	07/02/2003	62	Hudson Communications Incorporated	South Tucson, AZ	Pima
KXCI	FM	91.3	NC		Prgsv/Ecltc	Tucson, AZ	07/02/2003	62	Foundation for Creative Broadcasting Inc	Tucson, AZ	Pima
KXEW	AM	1600	C		Tejano	Tucson, AZ	07/02/2003	62	iHeartMedia	South Tucson, AZ	Pima
KXZK	FM	103.7	C		Clsc Rock	Tucson, AZ	03/13/2009	62	Cochise Broadcasting LLC	Vail, AZ	Pima
KYWD	FM	97.1	C		Country	Tucson, AZ	07/02/2003	62	iHeartMedia	Green Valley, AZ	Pima
KZLZ	FM	105.3	C		Mexican	Tucson, AZ	07/02/2003	62	KZLZ LLC	Casas Adobes, AZ	Pima

**Number of Stations in Geographic Market 41**

**Previous Stations in Geographic Market**

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

"p" indicates pending sale to owner listed