

DEMONSTRATION OF COMPLIANCE WITH MULTIPLE OWNERSHIP RULES

Rincon Broadcasting LS LLC (“Rincon”), the licensee of KSBL(FM), Carpinteria, California, hereby demonstrates that the instant modification application fully complies with the Commission’s multiple ownership regulations.¹

KSBL(FM) is “home” to the Arbitron Santa Barbara radio market. Rincon is the licensee of three additional FM radio stations and 2 AM radio stations in the Arbitron Santa Barbara radio market: KIST-FM, Santa Barbara, California; KSPE-FM, Ellwood, California; KTYD(FM), Santa Barbara, California; KIST(AM), Santa Barbara, California; and KTMS(AM), Santa Barbara, California.² Rincon has no attributable ownership interest, whether by ownership, LMA, or JSA, in any other station in the Santa Barbara market.

The most recent available Arbitron data for the Santa Barbara radio market reveals that there are 18 commercial and noncommercial radio stations in the market. *See* the BIA FCC Geographic Market Definition for Santa Barbara, attached hereto.³ Under the broadcast multiple ownership rules, in a radio market with between 15 and 29 commercial and noncommercial radio stations, an entity may lawfully own, operate, and control up to 6 radio stations, only 4 of which may be in one class. Accordingly, the minor modification proposed herein will have no impact on Rincon’s continued ownership of four FM stations and two AM stations in the market and its continued compliance with the multiple ownership rules.

¹ See 2002 Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996 et al., Report and Order and Notice of Proposed Rulemaking, FCC 03-127, aff’d in part and remanded in part, *Prometheus Radio Project, et al. v. FCC*, 373 F.3d 372 (3rd Cir. 2004), stay modified, No. 03-3388 (Sept. 3, 2004) (“Report and Order”).

² By this and a simultaneously filed application Rincon is proposing to change the cities of license of KSBL and KIST-FM. However, both the old and new cities of license are contained in the Arbitron Santa Barbara radio market.

³ The attached list indicates that Rincon’s six stations in the market are “owned” by Point Broadcasting Company (“Point”). Point is the parent company of Rincon, which is actually the station licensee. KIST-FM is listed as KQIE, which was the station’s previous call sign.



FCC Geographic Market Definition for Santa Barbara, CA

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market		Date	Rank	Owner	City & State of License	County of License
							Designtn	Home Mkt					
KTMS	AM	990	C	News/Talk	News/Talk	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	Point Broadcasting Company	Santa Barbara, CA	Santa Barbara
KCLU	AM	1340	NC	NPR/Nws/Inf	NPR/Nws/Inf	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	California Lutheran University	Santa Barbara, CA	Santa Barbara
KDB	FM	93.7	C	Classical	Classical	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	Pacific Broadcasting Company	Santa Barbara, CA	Santa Barbara
KZSB	AM	1290	C	News/Talk	News/Talk	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	Santa Barbara Broadcasting Inc	Santa Barbara, CA	Santa Barbara
KSBL	FM	101.7	C	AC	AC	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	Point Broadcasting Company	Carpinteria, CA	Santa Barbara
KIST	AM	1490	C	Talk	Talk	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	Point Broadcasting Company	Santa Barbara, CA	Santa Barbara
KVVB	FM	103.3	C	CHR	CHR	Oxnard-Ventura, CA	07/27/2005	118	07/27/2005	118	Cumulus Broadcasting Inc	Santa Barbara, CA	Santa Barbara
KRUZ	FM	97.5	C	Hot AC	Hot AC	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	Cumulus Broadcasting Inc	Santa Barbara, CA	Santa Barbara
KZER	AM	1250	C	Mexican	Mexican	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	Lazer Broadcasting Corporation	Santa Barbara, CA	Santa Barbara
KMGQ	FM	106.3	C	Smooth Jazz	Smooth Jazz	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	Cumulus Broadcasting Inc	Goleta, CA	Santa Barbara
KTYD	FM	99.9	C	AOR	AOR	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	Point Broadcasting Company	Santa Barbara, CA	Santa Barbara
KSPE	FM	94.5	C	Span/Oldes	Span/Oldes	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	Point Broadcasting Company	Ellwood, CA	Santa Barbara
KJEE	FM	92.9	C	Modern Rock	Modern Rock	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	Montecito FM Inc	Montecito, CA	Santa Barbara
KQIE	FM	107.7	C	Mexican	Mexican	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	Point Broadcasting Company	Santa Barbara, CA	Santa Barbara
KCSB	FM	91.9	NC	Variety	Variety	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	University of California Regents	Santa Barbara, CA	Santa Barbara
KQSC	FM	88.7	NC	Classical	Classical	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	University of Southern California	Santa Barbara, CA	Santa Barbara
KRAZ	FM	105.9	C	Country	Country	Santa Barbara, CA	07/02/2003	214	07/02/2003	214	Knight Broadcasting Inc	Santa Ynez, CA	Santa Barbara
KSBX	FM	89.5	NC	Public	Public	Santa Barbara, CA	01/06/2004	214	01/06/2004	214	KCBX Inc	Santa Barbara, CA	Santa Barbara

Number of Stations in Geographic Market 18

Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed