

## **EXHIBIT 15**

### **PARTIES TO THE APPLICATION**

As described more fully in Exhibit 5 hereto, this application is one of three concurrently filed applications on FCC Form 315 seeking the Commission's consent to the transfer of control of Simmons Media Group, LLC ("SMG"). SMG is the sole voting member of Simmons-SLC, LLC ("Simmons-SLC") which, in turn, is the sole member of Simmons-SLC, LS, LLC ("SSLC"), the licensee that is the subject of this application.<sup>1</sup> Information concerning the ownership and control of SSLC following completion of the proposed reorganization of SMG is set forth below.<sup>2</sup>

#### **1. SSLC**

<b>Name and Address</b>	<b>Positional Interest</b>	<b>Percentage Vote</b>	<b>Percentage of Total Assets (Debt plus Equity)</b>	<b>Percentage of Equity</b>
Simmons-SLC	Sole Member	100%	See footnote 5	100%
David E. Simmons	Manager	0%	0%	0%
G. Craig Hanson	Manager	0%	0%	0%
Bret J. Leifson	Manager	0%	0%	0%
Bruce Thomas	Manager	0%	0%	0%

#### **2. Simmons-SLC**

<b>Name and Address</b>	<b>Positional Interest</b>	<b>Percentage Vote</b>	<b>Percentage of Total Assets (Debt plus Equity)</b>	<b>Percentage of Equity<sup>3</sup></b>
SMG	Sole Voting Member	100%	See footnote 5	91.26%
David E. Simmons	Manager, Chairman, Non-Voting Member	0%	See footnote 5	6.94% (see footnote 3)
G. Craig Hanson	Manager, President, Non-Voting Member	0%	See footnote 5	0.66% (see footnote 3)
Bret J. Leifson	Manager, Secretary, Treasurer, Non-Voting Member	0%	See footnote 5	0.17% (see footnote 3)

<sup>1</sup> The address for SMG, Simmons-SLC, and SSLC is 515 S. 700 E. #1C; Salt Lake City, UT 84102. Unless otherwise indicated, managers, members, and officers of SMG, Simmons-SLC, and SSLC share this address as well.

<sup>2</sup> Except as otherwise indicated, all individuals named in this exhibit are U.S. citizens and entities named in this exhibit are U.S. entities.

<sup>3</sup> Prior to the closing of the transactions contemplated by the Restructuring Agreement (discussed in Exhibit 5), SMG intends to approach each holder of a minority interest in Simmons-SLC and offer to exchange such minority interest for Management Incentive Plan Units ("MIP Units") in SMG.

<b>Name and Address</b>	<b>Positional Interest</b>	<b>Percentage Vote</b>	<b>Percentage of Total Assets (Debt plus Equity)</b>	<b>Percentage of Equity<sup>3</sup></b>
Alan Hague	Non-Voting Member	0%	See footnote 5	0.05% (see footnote 3)
Steven C. Johnson	Vice President, Non-Voting Member	0%	See footnote 5	0.92% (see footnote 3)
Bruce Thomas	Manager, Executive Vice President	0%	0%	0%

### 3. SMG

<b>Name and Address</b>	<b>Positional Interest</b>	<b>Percentage Vote<sup>4</sup></b>	<b>Percentage of Total Assets (Debt plus Equity)<sup>5</sup></b>	<b>Percentage of Equity<sup>6</sup></b>
Goldman, Sachs & Co., a New York Limited Partnership ("GS & Co.") <sup>7</sup>	Member	42.2% total (40% through its designation of the two Goldman Managers	See footnote 5	9.67%

<sup>4</sup> As detailed in Exhibit 5 hereto, SMG will be controlled and governed by a five-member board of managers, three of whom will be specifically designated by certain members of SMG. One manager (the "Existing Members Manager") will be designated by the following nine parties (all of whom are existing members of SMG): The Julia S. Watkins 201 Trust; The Matthew R. Simmons 201 Trust; The Laurence E. Simmons 201 Trust; The Elizabeth S. Hoke 201 Trust; The Harris H. Simmons 201 Trust; The David E. Simmons 201 Trust; GS & Co.; Bruce W. Thomas; and Gregory Kunz. Two managers (the "Goldman Managers") will be designated by GS & Co. alone. With respect to the Existing Members Manager and the Goldman Managers, only the persons entitled to designate such managers are entitled to remove them. Similarly, with respect to the Existing Members Manager and the Goldman Managers, upon the removal of one of these managers, or in the event that one of these managers is unable to continue to serve as a manager for any reason, only the persons entitled to designate such manager are entitled to select his or her replacement. It is understood by all parties to this application that the Existing Members Manager and the Goldman Managers will act exclusively at the direction of, and on behalf of, the persons entitled to designate such members.

The remaining two managers of SMG will be "Independent Managers." The initial Independent Managers, Chris McMurray and Dennis Davis, have been agreed upon by the parties to the Restructuring Agreement, which includes GS & Co., the existing members of SMG, SMG's existing lenders and SMG's proposed warrant holders. The Independent Managers have complete autonomy and are not answerable to any party to the Restructuring Agreement. Accordingly, an Independent Manager can only be removed by the unanimous vote of the other managers upon a finding of cause – i.e., that the Independent Manager has engaged in gross negligence, willful misconduct or fraud. Upon the resignation, removal for cause or death of any Independent Manager, a replacement for such Independent Manager will be appointed by a majority vote of the remaining managers. A replacement Independent Manager cannot be an employee, director or officer of the Existing SMG Members, GS & Co., or their affiliates, and, like his or her predecessor, a replacement Independent Manager is not answerable to any other party and can only be removed by the unanimous vote of the other managers upon a finding of cause.

<b>Name and Address</b>	<b>Positional Interest</b>	<b>Percentage Vote<sup>4</sup></b>	<b>Percentage of Total Assets (Debt plus Equity)<sup>5</sup></b>	<b>Percentage of Equity<sup>6</sup></b>
		and 2.2% through its proportional interest in designating the Existing Members Manager – see footnote 4)		
The Julia S. Watkins 201 Trust (Julia S. Watkins, Christopher M. Watkins, and Catherine W. Stringham, Co-Trustees)	Member	2.2% (see footnote 4)	See footnote 5	2.87%
The Matthew R. Simmons 201 Trust (Matthew R. Simmons and Terri Lacy, Co-Trustees)	Member	2.2% (see footnote 4)	See footnote 5	2.87%
The Laurence E. Simmons 201 Trust (Laurence E. Simmons and Terri Lacy, Co-Trustees)	Member	2.2% (see footnote 4)	See footnote 5	2.67%
The Elizabeth S. Hoke 201 Trust (Elizabeth S. Hoke and Henry C. Phibbs II, Co-Trustees)	Member	2.2% (see footnote 4)	See footnote 5	2.67%
The Harris H. Simmons 201 Trust (Harris H. Simmons and David E. Simmons, Co-Trustees)	Member	2.2% (see footnote 4)	See footnote 5	2.73%
The David E. Simmons 201 Trust (David E. Simmons, Trustee)	Member	2.2% (see footnote 4)	See footnote 5	2.87%
Certain Members of SMG's Management and Employees <sup>8</sup>	Members	0%	See footnote 5	73.34%

<sup>5</sup> No individual or entity will hold an equity and/or debt interest totaling 33% or more of the total asset value of SMG, except for GS & Co. and certain commonly-controlled lenders to SMG (who, in the aggregate, will hold a debt interest representing more than 33% of the company's total asset value). These lenders are not reported herein because they do not hold any attributable interests in any media properties located in any markets in which SMG operates radio stations, and are therefore not attributable pursuant to the FCC's "equity/debt plus" rule.

<sup>6</sup> This column shows the percentage of equity to be held by each party on a non-diluted basis and assumes full distribution and vesting of the MIP Units discussed in footnote 8 below.

<sup>7</sup> Except as otherwise indicated, the address for the Goldman Sachs individuals and entities listed in this exhibit is c/o Goldman, Sachs & Co.; 200 West Street; New York, NY 10282.

<sup>8</sup> On or after the closing of the transactions contemplated by the Restructuring Agreement, certain members of SMG's management and employees will receive MIP Units in the restructured company subject to a three year vesting schedule. When fully vested, the MIP Units will represent up to 73.34% of SMG's non-diluted equity (assuming that no other rights to future equity interests have been issued or exercised, which equates to 17.06% of the company's fully-diluted equity). As soon as the individuals receiving MIP Units are identified, the applicant will ensure that they comply with all applicable FCC rules and requirements. The issuance of the MIP Units will not have any effect on the control and governance of SMG. As discussed more fully in Exhibit 5, SMG will be controlled and governed by a five-member board of

<b>Name and Address</b>	<b>Positional Interest</b>	<b>Percentage Vote<sup>4</sup></b>	<b>Percentage of Total Assets (Debt plus Equity)<sup>5</sup></b>	<b>Percentage of Equity<sup>6</sup></b>
David E. Simmons	Chairman, Manager (designated by existing SMG members)	See footnote 4	0%	0%
David Horowitz	Manager (designated by GS & Co.)	See footnote 4	0%	0%
Gregory Kunz 670 Goodhill Rd. Kentfield, CA 94904	Member; Manager (designated by GS & Co.)	2.3% (see footnote 4)	See footnote 5	0.02%
Chris McMurray 3926 Bridge Harbor Galveston, TX 77554	Manager (independent)	20% (see footnote 4)	0%	0%
Dennis Davis 910 N. Tilden Visalia, CA 93219	Manager (independent)	20% (see footnote 4)	0%	0%
G. Craig Hanson	President	0%	0%	0%
Bruce W. Thomas	Member; Executive Vice President; and Chief Financial Officer	2.3% (see footnote 4)	See footnote 5	0.29%
Bret J. Leifson	VP Administration, Secretary, and Controller	0%	0%	0%

#### 4. GS & Co.

The Goldman Sachs Group, Inc. (“GSG”) is the sole limited partner of GS & Co. The general partner of GS & Co. is The Goldman, Sachs & Co., LLC (“GS LLC”), of which GSG is the sole member. GSG is a widely-held Delaware corporation that is publicly traded on the New York Stock Exchange.<sup>9</sup>

GS & Co.’s investment in SMG is managed by the company’s Special Situations Group. Richard M. Ruzika is an Assistant Secretary of GSG and the Global Head of the Special Situations Group. As such, all decisions regarding GS & Co.’s investment in SMG ultimately are made by Mr. Ruzika, and he has the discretion to manage GS & Co.’s

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managers consisting of individuals specifically designated by certain members of SMG. The holders of the MIP Units will not have any right to designate or vote for the election of any board managers.

<sup>9</sup> Based on an April 2010 Schedule 14A filing for GSG, parties to a Shareholders’ Agreement (the “Agreement”) hold, collectively, approximately 7.4 percent of GSG’s stock. Each party to the Agreement disclaims beneficial ownership of the shares subject to the Agreement owned by any other party to the Agreement, and no party to the Agreement holds a 5% or greater equity or voting interest in GSG. Accordingly, none of the parties to the Agreement are deemed to have an attributable interest in GSG as a result of their interest in the Agreement. No individual or entity holds (directly or indirectly) an interest in GSG that would be considered attributable under the FCC’s ownership and attribution rules.

investment in SMG without seeking any approvals from GSG's board of directors.<sup>10</sup> GSG acknowledges that control of its investment in SMG resides with Mr. Ruzika through his position as Global Head of the Special Situations Group.<sup>11</sup>

As discussed above, with the exception of Mr. Ruzika, no officers or directors of GSG perform duties or have responsibilities related to GSG's investment in SMG. Accordingly, consistent with past treatment of other broadcast properties in which GSG holds or proposed to hold attributable interests,<sup>12</sup> with the exceptions of (i) Mr. Ruzika and (ii) Donald Mullen and Richard A. Friedman, both of whom are Assistant Secretaries of GSG and perform duties related to certain other GSG broadcast investments,<sup>13</sup> the other officers and directors of GSG, including the following, will be non-attributable in the ownership structure of SMG:

Lloyd C. Blankfein, Chairman, Chief Executive Officer and Director<sup>14</sup>  
Gary D. Cohn, President, Chief Operating Officer and Director<sup>14</sup>  
John H. Bryan, Director  
Claes Dahlbäck, Director<sup>15</sup>  
Stephen Friedman, Director  
William W. George, Director  
James A. Johnson, Director  
Lois D. Juliber, Director  
Lakshmi N. Mittal, Director  
James J. Schiro, Director  
H. Lee Scott, Jr., Director  
J. Michael Evans, Vice Chairman  
Michael S. Sherwood, Vice Chairman  
John S. Weinberg, Vice Chairman<sup>14</sup>  
David A. Viniar, Executive Vice President and Chief Financial Officer<sup>14</sup>

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<sup>10</sup> The individuals initially designated by Mr. Ruzika to serve on SMG's board will be David Horowitz and Gregory Kunz. Mr. Horowitz is an employee of GS & Co.

<sup>11</sup> GSG's Special Situations Group is a business unit within GSG's Securities Division. Attached is a letter executed by Harvey M. Schwartz, the Global Co-Head of GSG's Securities Division (and an Assistant Secretary of GSG), confirming that all decision-making authority with respect to GSG's investment in SMG is vested ultimately in Mr. Ruzika by virtue of his position as Global Head of the Special Situations Group.

<sup>12</sup> See, e.g., FCC File Nos. File No. BTC(H)-20090518AHQ, IO; BTCH-20090522AFH, L; BALH-20070720AAP, BALH-20050715ABT, BALH-20040720AEI and BAL-20040720ADV.

<sup>13</sup> The other broadcast properties in which GSG holds attributable interests, including those with which Messrs. Mullen and Friedman are associated, are set forth in Exhibit 7 hereto.

<sup>14</sup> Individual is also an officer and/or director of GS LLC but, as noted above, does not perform duties or have responsibilities related to the SMG investment. Accordingly, this individual will be non-attributable in the ownership structure of SMG.

<sup>15</sup> Mr. Dahlbäck is a citizen of Sweden.

Gregory K. Palm, Executive Vice President, General Counsel and Secretary of the Corporation<sup>14</sup>

Esta E. Stecher, Executive Vice President, General Counsel and Secretary of Corporation<sup>14</sup>

Alan M. Cohen, Executive Vice President and Global Head of Compliance

Sarah E. Smith, Principal Accounting Officer and Controller

Elizabeth E. Beshel, Treasurer<sup>14</sup>

Dane E. Holmes, Director of Investor Relations

Dina Powell, Director of Corporate Engagement

Craig W. Broderick, Chief Risk Officer

Robert A. Berry, Chief Market Risk Officer

David D. Wildermuth, Chief Credit Officer

Jeffrey W. Schroeder, Chief Administrative Officer

Gary N. Schermerhorn, Co-Chief Information Officer

Steven M. Scopellite, Co-Chief Information Officer

Joseph M. Busuttil, Director of Internal Audit

John F.W. Rogers, Chief of Staff and Secretary to the Board

Edith W. Cooper, Global Head of Human Capital Management

Court E. Golumbic, Global AML Compliance Officer

Gwen R. Libstag, Global Head of Business Selection and Conflict Clearance

Russell Broome, Assistant Secretary<sup>14</sup>

Steven M. Bunson, Assistant Secretary<sup>14</sup>

Nabanita Chatterjee, Assistant Secretary<sup>14</sup>

Christopher A. Cole, Assistant Secretary

E. Gerald Corrigan, Assistant Secretary

Edward C. Forst, Assistant Secretary

David B. Heller, Assistant Secretary

Kevin W. Kennedy, Assistant Secretary

Timothy O'Neill, Assistant Secretary

Benjamin J. Rader, Assistant Secretary

Harvey Schwartz, Assistant Secretary

Howard A. Silverstein, Assistant Secretary

David M. Solomon, Assistant Secretary

Steven H. Strongin, Assistant Secretary

Timur F. Galen, Assistant Secretary-Corporate Services

Frances R. Bermanzohn, Deputy General Counsel<sup>14</sup>

Kenneth L. Josselyn, Associate General Counsel and Assistant Secretary<sup>14</sup>

Julie Hausen, Assistant Secretary<sup>14</sup>

Ida Hodhooghi, Assistant Secretary

Beverly L. O'Toole, Assistant Secretary<sup>14</sup>

Matthew E. Tropp, Assistant Secretary<sup>14</sup>

Eileen M. White, Assistant Secretary

Philip V. Giuca, Jr., Assistant Secretary

Manda J. D'Agata, Assistant Treasurer<sup>14</sup>

Rajashree Datta, Assistant Treasurer

Brian D. Glass, Assistant Treasurer

Melody C. Go, Assistant Treasurer

Mokyoung R. Hyun, Assistant Treasurer

Michael E. Kurlander, Assistant Treasurer  
Henry S. Webb, Assistant Treasurer  
James J. White, Jr., Assistant Treasurer

The certification of compliance with Section 310(b) of the Communications Act, with respect to GSG, a publicly traded company, is based, in part, on a survey of the addresses of record of the beneficial owners of its stock conducted by Broadridge Financial Solutions, Inc. ("Broadridge"), a firm that specializes in securities processing, clearing and outsourcing, and in investor communications, using the methodology for establishing levels of foreign investment approved by the Commission in the context of the Verizon Wireless/ALLTEL transaction. See Applications of Cellco Partnership d/b/a Verizon Wireless and Atlantis Holdings LLC, Memorandum Opinion and Order and Declaratory Ruling, WT Docket No. 08-95, FCC 08-258, ¶¶ 228-29 (rel. Nov. 10, 2008). Specifically, a review by Broadridge of the addresses of record of the beneficial owners of GSG's voting common stock indicates that, as of May 11, 2010, approximately 89.05% of the voting common shares outstanding are owned by U.S. citizens.

**The Goldman Sachs Group, Inc.**  
200 West Street  
New York, New York 10282  
Tel: 212-902-1000



October 7, 2010

Mr. John M. Burgett  
Wiley Rein LLP  
1776 K Street, NW  
Washington, DC 20006

Dear Mr. Burgett:

In response to your request for documentation regarding the management of our investment in Simmons Media Group, LLC ("SMG"), The Goldman Sachs Group, Inc. ("GSG") hereby confirms that the corporation's investment in SMG is managed by the corporation's Special Situations Group. As such, all decision-making authority with respect to GSG's investment in SMG is vested ultimately in Richard M. Ruzika, the Global Head of the Special Situations Group and an Assistant Secretary of GSG. In his capacity as the Global Head of the Special Situations Group, Mr. Ruzika has the discretion to manage GSG's investment in SMG without seeking any approvals from GSG's board of directors. With the exception of Mr. Ruzika, no officers or directors of GSG perform duties or have responsibilities related to GSG's investment in SMG.

Sincerely,

**THE GOLDMAN SACHS GROUP, INC.**

By:

Name: *Harvey Schwartz*  
Title: *Assistant Secretary*