

Exhibit 15

Local Radio Ownership Introduction

This application and five other concurrently filed assignment of license applications (the "Applications") request Commission consent for the assignment of the licenses for 186 radio stations from one of the following broadcast licensee subsidiaries of Clear Channel Communications, Inc. to Frequency License, LLC ("Frequency"):

- Clear Channel Broadcasting Licenses, Inc. ("CCBL")
- CC Licenses, LLC ("CC Licenses")
- Citicasters Licenses, L.P. ("Citicasters")
- Jacor Broadcasting Corporation ("Jacor")
- AMFM Radio Licenses, L.L.C. ("AMFM")
- Capstar TX Limited Partnership ("Capstar")

The common ownership of these stations implicates the Commission's local radio ownership rule because (i) the principal community contours for certain stations overlap, (ii) certain stations are licensed to communities within Arbitron Metro Markets, (iii) and/or BIA reports that Arbitron lists certain stations as "home" to a ranked Arbitron market.¹

Under Section 73.3555(a)(1) of the Commission's rules, the FCC uses a tiered approach, as described below, to determine whether a combination of commonly-owned radio stations complies with the local radio ownership limits for any particular market.²

Full-Power Commercial and Noncommercial Stations in the Market	Maximum Number of Stations in Which a Single Entity May Have an Attributable Interest	Maximum Number of Stations in the Same Service
45 or More Stations	8 Radio Stations	5
Between 30 and 44 Stations	7 Radio Stations	4
Between 15 and 29 Stations	6 Radio Stations	4
14 or Fewer Stations	5 Radio Stations (Provided that no entity may have an interest in more than 50% of the stations in the market)	3

To determine the number of stations in a market, the Commission relies on one of three methodologies:

1. Arbitron-Only Methodology: When more than one commonly owned radio station is licensed to a community within an Arbitron Metro Market, the FCC

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, *Report & Order & Notice of Proposed Rulemaking*, 18 FCC Rcd 13,620, ¶¶ 279-86 (2003).

² See 47 C.F.R. 73.3555(a)(1) (2006).

counts the number of commercial and noncommercial radio stations that are either “home” to the Arbitron market or are licensed to a community within that market.³

2. Contour-Only Methodology: For combinations that are licensed to communities outside an Arbitron market, the Commission defines the market as the area where the principal community contours for the commonly-owned stations overlap. To determine the number of stations in that market, the Commission counts all stations whose principal community contours overlap that of at least one of the commonly-owned stations. The Commission, however, excludes all stations whose transmitters are greater than 92 kilometers from the mutual overlap area and any commonly owned stations that are not included already in the market.⁴

3. Arbitron-Contour Hybrid Methodology: The FCC requires an analysis under both the Arbitron methodology and the contour methodology in two situations: (i) if at least one of the commonly-owned stations is “home” to an Arbitron market but it is licensed to a community outside that market or (ii) if a station is licensed to a community within an Arbitron market but its principal community contour overlaps that of another commonly-owned stations that is not licensed to a community within that Arbitron market.⁵

Each of the radio combinations that Frequency proposes to acquire are described in the pages attached hereto.⁶ The attachments demonstrate whether the proposed combinations will comply with the Commission’s local ownership rules. In instances where a proposed combination exceeds the local ownership limits, Frequency will assign the necessary stations to a properly insulated divestiture trust prior to or contemporaneously with the closing of the transactions contemplated by the Applications. The use of a divestiture trust in these circumstances is consistent with well-established Commission precedent.⁷ After the assignments to the divestiture trust, the common ownership of the radio stations proposed in the Applications will comply with the Commission’s local radio ownership rule and policies.

³ See *Biennial Review*, 18 FCC Rcd at ¶ 280.

⁴ See *id.* at ¶ 285.

⁵ See *id.* at ¶ 286 n.606.

⁶ In the attached engineering exhibits, all references to GoodRadio.TV License, LLC should be deemed references to Frequency.

⁷ See Citadel Broadcasting Company, *Memorandum Opinion & Order & Notice of Apparent Liability*, 22 FCC Rcd 7083, ¶¶ 59-60 (2007).