

Description of the Transaction
and Appropriate Use of FCC Form 316

The instant application requests consent to a transfer of control of the broadcast radio and television licenses and authorizations (the “Licenses”) held by Ramar Communications, Inc. (“Ramar”). This transfer is part of the estate planning of Ray Moran and his wife Mary Moran, whereby Ray Moran will transfer a portion of his 51% voting interest in Ramar to a trust. This application is being filed concurrently with an FCC Form 312, which requests consent to the transfer of control of two Ramar earth station authorizations.

Currently, Ray Moran holds 51% of the voting stock of Ramar. This application seeks approval of a transfer of 49% of the voting stock of Ramar from Ray Moran to The Ramar Family Trust, Brad L. Moran, Trustee, an irrevocable trust dated November 1, 2012 (the “Trust”). Brad Moran is the sole trustee (the “Trustee”) of the Trust, and Brad Moran and his wife Carla Moran and their descendants are the Trust beneficiaries. Ray Moran intends to retain the remaining 2% voting interest in Ramar. Following the consummation of the proposed transfer, the voting stock of Ramar will be held as follows: Ray Moran, 2%; Brad Moran, 98% (49% individually and 49% as Trustee of the Trust).

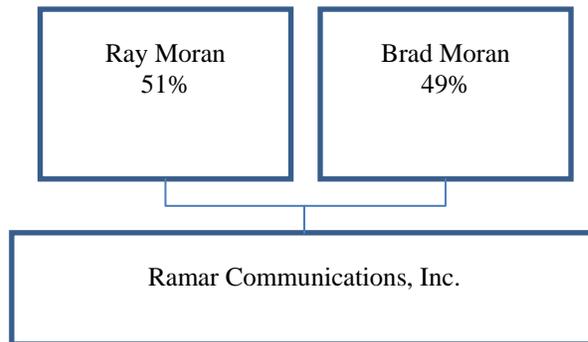
The Commission has repeatedly approved the qualifications of the Trustee, Brad Moran, in his capacity as an individual owner of a 49% voting interest in and officer and director of Ramar. For example, Brad Moran’s qualifications were approved by the Commission in 2010 through grant of a “long form” application for a new FM station, now KLBB-FM, Idalou, Texas. *See, e.g.*, FCC File No. BPH-19971016MJ (FCC Form 301, granted October 6, 2010).

Under these circumstances, the use of FCC Form 316 is appropriate. Specifically, the FCC has held that an FCC Form 316 is suitable for a proposed transaction where (1) less than 50% of the voting stock of the licensee is being transferred and (2) as a result of the transaction, 50% or more of the voting stock will not be held by a person or persons whose qualifications have not been passed upon in a long form application. *See Grace Missionary Baptist Church*, 80 FCC 2d 330 (1980); *Barnes Enterprises, Inc.*, 55 FCC 2d 721 (1975). *See also* FCC Form 316 Instructions at 1 (FCC Form 316 is appropriate in the context of “an assignment or transfer by which certain stockholders retire, provided that the interest transferred to the remaining stockholders is not a controlling interest”).

Because only 49% of the voting interest in Ramar will be transferred pursuant to the proposed transaction and the Commission has approved the qualifications of Brad Moran, who will be the sole trustee of the trust to which the Ramar voting interest will be transferred, use of FCC Form 316 is appropriate in the instant case.

Upon the consummation of the proposed transaction, the Trust will hold a 49% voting interest in Ramar. A chart illustrating the current and proposed ownership structure is provided on the following page.

Current Ownership Structure



Proposed Ownership Structure

