

FIRST ATTACHMENT TO EXHIBIT 19

STATEMENT RE MULTIPLE-OWNERSHIP COMPLIANCE

1. The two shareholders of Europa Communications, Inc. (*Europa*), the licensee of radio station WMTT(FM), Channel 234B1, Tioga, Pennsylvania, FCC Facility ID No. 19858, Kevin M. Fitzgerald and George Hawras, have media interests as set forth in the Attachment to Exhibit 17.
2. By means of the proposed transaction, Mr. Fitzgerald would surrender positive control by transferring 50 shares of Europa stock to Mr. Hawras. After the proposed transfer of shares, neither Mr. Fitzgerald nor Mr. Hawras would exercise positive control over Europa. Each of them, however, would exercise negative control over Europa. Each of them presently have an attributable interest in Europa, and will continue to have an attributable interest in Europa.
3. Europa itself does not have attributable interests in any medium of mass communications other than as the licensee of radio station WMTT(FM) other than in certain FM translator stations, which are not relevant for the purposes of this analysis.
4. BIA characterizes radio station WMTT(FM), in which both Messrs. Fitzgerald and Hawras have attributable interests, as a station that is home to the Arbitron-defined Elmira, New York market.
5. Both radio station WPHD(FM), in which both Messrs. Fitzgerald and Hawras have attributable interests, and that station's community of license, South Waverly, Pennsylvania, are located in Bradford County, Pennsylvania. Bradford County, Pennsylvania is not located within any Arbitron-defined Metro Survey Area, per Arbitron's 2009 data. However, Arbitron's 2009 listings include radio station WPHD(FM) as an, "Above the Line" facility, and thus home to the Binghamton, New York Arbitron-defined Metro Survey Area.
6. The city-grade-service contours of stations WMTT(FM) and WPHD(FM) do not overlap each other. See the second attachment to this Exhibit.

7. Both radio station WZKN(FM) – formerly WREQ(NCE-FM) – in which Mr. Fitzgerald (but not Mr. Hawras) has an attributable interest, and that station’s community of license, Ridgebury, Pennsylvania, are located in Bradford County, Pennsylvania. As noted above, per Arbitron’s 2009 data, Bradford County, Pennsylvania is not located within any Arbitron-defined Metro Survey Area. However, unlike the case of station WPHD(FM), Arbitron’s 2009 listings do not include radio station WZKN as an, “Above the Line” facility in any Arbitron-defined Metro Survey Area.

8. The city-grade-service contour of station WZKN does not overlap the city-grade contour of station WMTT(FM) or of any other relevant station except for station WPHD(FM). The FCC staff considered the matter of the overlap of station WZKN’s and station WPHD(FM)’s city-grade-service contours, and found no issue of non-compliance with the Commission’s multiple-ownership rule. See FCC File No. BALED-20090825BKV. Furthermore, because Mr. Hawras does not have an attributable interest in station WZKN, the overlap between station WZKN and station WPHD(FM) is not relevant to this application, which proposes Mr. Hawras’s acquisition of negative control of station WMTT(FM), and Mr. Fitzgerald’s surrender of positive control (and his accession to negative control) of station WMTT(FM).

9. Radio Station WRRQ(FM) and its community of license, Port Dickinson, New York, are in Broome County. Broome County is within the Arbitron-defined Binghamton, New York Metro Survey Area. BIA considers station WCDW(FM) to be an Above-The-Line Station and thus home to the Arbitron-defined Binghamton, New York Metro Survey Area. Station WCDW’s community of license, Susquehanna, Pennsylvania, is also within the Arbitron-defined Binghamton, New York Metro Survey Area.

10. The city-grade-service contours of stations WCDW(FM) and WRRQ(FM) overlap each other. However, the city-grade-service contours of stations WCDW(FM) and WPHD(FM) do not overlap each other. Similarly, the city-grade-service contours of stations WRRQ(FM) and WPHD(FM) do not overlap each other. See the second attachment to this Exhibit.

11. Radio station WZHD(FM), and its community of license, Canaseraga, New York, are located in Allegheny County. Allegheny County is part of the Arbitron-defined Olean, New York Metro Survey Area. Radio Station WZHD(FM) is thus home to the Olean, New York Metro. The city-grade-service contour of station WZHD does not overlap the city-grade contour of station WCDW(FM), WRRQ(FM), WPHD(FM), or WMTT(FM). See the second attachment to this Exhibit.

12. In light of the foregoing, the surrender of positive control of the licensee of station WMTT(FM) by Mr. Fitzgerald, and the acquisition of negative control of the licensee of station WMTT(FM) by Mr. Hawras, both proposed in this application, would not violate even the most restrictive component of the Commission's local radio multiple-ownership rule, § 73.3555(a)(1)(iv). Moreover, the proposed transferee, Mr. Hawras, already has an attributable interest in Europa Communications, Inc., the licensee of station WMTT(FM), because he is an officer and a director of the licensee corporation.

13. Accordingly, the proposed ownership structure is consistent with § 73.3555(a)(1) of the Commission's Rules, 47 C.F.R. § 73.35557(a)(1).

14.. Mr. Hawras's simultaneously held ownership interests in Stations WPHD(FM), WCDW (FM), and WRRQ(FM) also comply with § 73.3555(a)(1) of the Commission's Rules, 47 C.F.R. § 73.35557(a)(1)(iii). There are at least fifteen (15) stations in the Arbitron-defined Binghamton, New York market, and § 73.35557(a)(1)(iii), which allows a single party to hold attributable interests in not more than six commercial radio stations in total, and not more than four commercial stations in the same service (AM or FM).