

## EXHIBIT 17

### Multiple Ownership

As noted in Exhibit 7 hereto, Superior Broadcasting of Denver, LLC (“Superior”), is the licensee of KFVR-FM, La Junta, Colorado. Alta-Superior Holdings, Inc. (“Alta”), is a Class B Preferred Unit Holder of Superior. Through its interests in Commonwealth License Subsidiary, LC, Alta also holds attributable interests in KTHN(FM) and KBLJ(AM) in La Junta, Colorado, and KLMR(AM) and KSNZ(FM) in Lamar, Colorado (the “Commonwealth Stations”). As demonstrated in the attached Technical Statement, certain of the signal contours of the Commonwealth Stations overlap the signal contour KFVR-FM.

For the purposes of the FCC’s local radio ownership rules, three “markets” are created by the proposed combination of the Commonwealth Stations and KFVR-FM. The first market includes KBLJ(AM), KTHN(FM), and KFVR-FM. The second market includes KBLJ(AM), KLMR(AM), and KFVR-FM. The third market consists of KLMR(AM) and KSNZ(FM). Under Section 73.3555(a)(1)(iv) of the Commission’s rules (47 C.F.R. § 73.3555(a)(1)(iv), common ownership of the stations in these markets is permitted so long as the common ownership does not exceed 50 percent of the stations in the markets. As such, common ownership of the stations in these markets is permitted if six commercial stations exist in Markets One and Two and four commercial stations exist in Market Three.

As demonstrated in the Technical Statement, there are six stations in Markets One and Three and seven stations in Market Two. KFVR-FM and the Commonwealth Stations, however, represent all but two of the stations in each market. In the Report and Order setting forth the Commission’s revised ownership rules, the Commission established an interim policy of excluding from the total number of stations in a market any commonly-owned stations that are not included in defining the market.<sup>10</sup> Although the Report and Order currently is subject to a stay of effectiveness imposed by the Third Circuit Court of Appeals, Superior recognizes the Commission’s concerns with respect to such commonly-owned stations. If such stations were excluded in the instant case, Markets One and Two would have just five stations each --- one less than what is required under Section 73.3555(a)(1)(iv) of the Commission’s rules.<sup>11</sup>

Superior notes, however, that the divestiture of KLMR(AM) would bring the proposed transaction into compliance with the local radio ownership rules, even under the Commission’s interim policy. In fact, Commonwealth License Subsidiary, LLC already has proposed to assign KLMR(AM) and KSNZ(FM) to CCR-Lamar IV, LLC (an entity with no attributable interests in Superior). Moreover, on December 19, 2003, the Commission granted its consent to this assignment (*See* FCC File No. BAL-20031017ACU). Superior understands that the parties intend to consummate the proposed assignment in approximately thirty days. Thus, upon the consummation of the assignment of KLMR(AM) and KSNZ(FM), the instant transaction will be in compliance with the Commission’s interim policy and ownership rules. Superior will amend the instant application accordingly when the assignment of KLMR(AM) and KSNZ(FM) is consummated.

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<sup>10</sup> 2002 Biennial Regulatory Review, Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, ¶ 285 (rel. Jul. 2, 2003).

<sup>11</sup> Market Three would have four stations and therefore would continue to comply with the Commission’s rules.