

RESPONSE TO SECTION II, ITEM 4(b)

This application requests approval of a minor change in the facilities for WSJR(FM), Dallas, Pennsylvania (the “Station”). This application does not seek to change the Station’s frequency or community of license, and it will not create new or increased concentration of ownership among commonly owned, operated or controlled media properties. Therefore, as explained below, the multiple ownership rules do not apply to this application.

This application is a “minor change” application because it does not propose a change in either the Station’s frequency or its community of license. *See* 47 C.F.R. § 73.3573(a). Note 4 to 47 C.F.R. § 73.3555 (2003) provides that the multiple ownership rules apply only to applications for minor changes to existing stations that implement an approved change in an FM radio station’s community of license or create new or increased concentration of ownership among commonly owned, operated, or controlled media properties. As shown below, grant of the application will not create any new or increased concentration of ownership. Therefore, the multiple ownership rules do not apply to this application.

For purposes of the local radio ownership rule, the Station is deemed to be a part of the Wilkes Barre-Scranton radio market. The attached “FCC Geographic Market Definition for Wilkes Barre-Scranton, PA” (the “BIA Report”) was compiled on February 3, 2005 using BIA Research, Inc.’s *Media Access Pro* database. The exhibit

lists all radio stations, including the Station, that are licensed to communities within the counties comprising the Wilkes Barre-Scranton, Pennsylvania Arbitron Metro or that Arbitron designates as “home” to the Wilkes Barre-Scranton, Pennsylvania Metro. As demonstrated in the BIA Report, there are 50 stations in the Wilkes Barre-Scranton market as so defined. Under the local radio ownership rule, a person or single entity (or entities under common control) in a radio market with 45 or more full-power, commercial and noncommercial radio stations may have a cognizable interest in not more than 8 commercial radio stations in total, and not more than 5 commercial stations in the same service (AM or FM).

As shown in the BIA Report, Citadel controls 6 radio stations (WARM(AM), WBHD(FM), WBHT(FM), WBSX(FM), WMGS(FM), and WSJR(FM)) in the Wilkes Barre-Scranton market (1 AM, and 5 FM), including the Station, which is less than the eight (no more than five in one service) permitted. Therefore, Citadel’s radio ownership in the Wilkes Barre-Scranton market fully complies with the local radio ownership rule.