

## **EXHIBIT 15**

### **Radio Multiple Ownership**

Pursuant to Section 73.3555(a)(1) of the Commission's Rules, the agency uses a tiered approach to determine whether a combination of commonly-owned or attributable radio stations complies with the radio ownership limitations in a particular market.<sup>1</sup> To demonstrate compliance with this rule, the FCC relies upon one of three different methodologies:

#### Arbitron Only Methodology

In situations where more than one commonly-owned and/or attributable radio station is "home" to *and* licensed to a community within an Arbitron Metro's boundaries, the Arbitron-Only Methodology applies. Using this Methodology, the FCC determines the number of stations in the radio market by counting all commercial and non-commercial stations that are either "home to" the Arbitron Metro and/or are licensed to a city within the Arbitron Metro's boundaries, as listed by BIA in its "FCC Geographic Market" analysis.

#### Contour-Only Methodology

For combinations involving stations that are licensed to communities outside an Arbitron Metro, the FCC currently applies an interim contour-overlap method. Under

---

<sup>1</sup> Under this approach, entities under common control may have a cognizable interest in radio broadcast licenses with the following limits: (i) In a radio market with 45 or more full-power, commercial and non-commercial radio stations, up to 8 commercial radio stations, of which not more than 5 are in the same service; (ii) In a radio market with between 30 and 44 stations, up to 7 stations of which not more than 4 are in the same service; (iii) In a radio market with between 15 and 29 stations up to 6 stations, of which not more than 4 are in the same service; (iv) In a radio market with 14 or fewer stations, up to 5 stations, of which not more than 3 are in the same service; provided, however, that no entity may have a cognizable interest in more than 50% of the stations in such market unless the combination of stations comprises not more than one AM and one FM station.

this approach, the applicable market is defined by the overlapping principal community contours of the commonly-owned stations. To determine the total number of radio stations in the market, the Commission includes any station whose principal community contour overlaps that of at least one of the commonly-owned stations, with two exceptions. It excludes those stations with transmitter sites farther than 92 kilometers (58 miles) from the perimeter of the common overlap area and/or commonly-owned radio stations that do not overlap the mutual overlap area of the other stations in the combination.

#### Arbitron-Contour Methodology

In two circumstances, the FCC requires both Arbitron and Contour Methodology Showings: (1) Where one of the commonly-owned stations is licensed to a community outside of an Arbitron Metro, but is considered “home to” an Arbitron Metro; and (2) Where a station that is licensed to a community within an Arbitron Metro (regardless of whether the station is home to that Metro) has overlapping principal community contours with at least one other commonly-owned station that is not licensed to a community in an Arbitron Metro.

Where Arbitron Methodology has been used to assess whether particular combinations comply with the multiple ownership rules, the Exhibit provides BIA FCC Geographic Market printouts obtained from BIA’s Media Access Pro dated October 17, 2007. Where Contour Methodology was required, the Exhibit provides the following:

- A table listing all commonly-owned stations;

- One or more tables listing the stations in the contour market(s) created by the commonly-owned stations;
- A contour map depicting the contour markets created by the combination of commonly-owned and/or attributable stations;<sup>2</sup> and
- One or more tables listing those stations whose principal community contours overlap at least one of the commonly-owned station, excluding; (1) those with a transmitter site farther than 92 kilometers from the perimeter of the common overlap area; and/or (2) commonly-owned radio stations that do not overlap the mutual overlap area of the other stations in the combination. Note that these tables do not list all stations in the market in situations where the total number of stations in a market significantly exceeds the number needed to justify the ownership combination.

---

<sup>2</sup> In the contour maps: dark blue lines indicate FM stations that are “home” to *and* licensed to communities within an Arbitron Metro’s boundaries; light blue lines denote FM stations that are not licensed to communities within an Arbitron Metro’s boundaries (these stations may or may not be “home” to an Arbitron); red lines represent AM stations that are “home” to *and* licensed to communities within an Arbitron Metro’s boundaries; and orange lines show AM stations that are not licensed to communities within an Arbitron Metro’s boundaries (these stations may or may not be “home” to an Arbitron).

## Casper, WY Area

Commonly owned Casper, WY Area stations included in this study:

Call Sign

KTWO  
KKTL  
KMGW  
KWYY  
KWYY-CP  
KTRS-FM  
KRVK-CP  
KRVK

Contour market created by the commonly-owned stations:

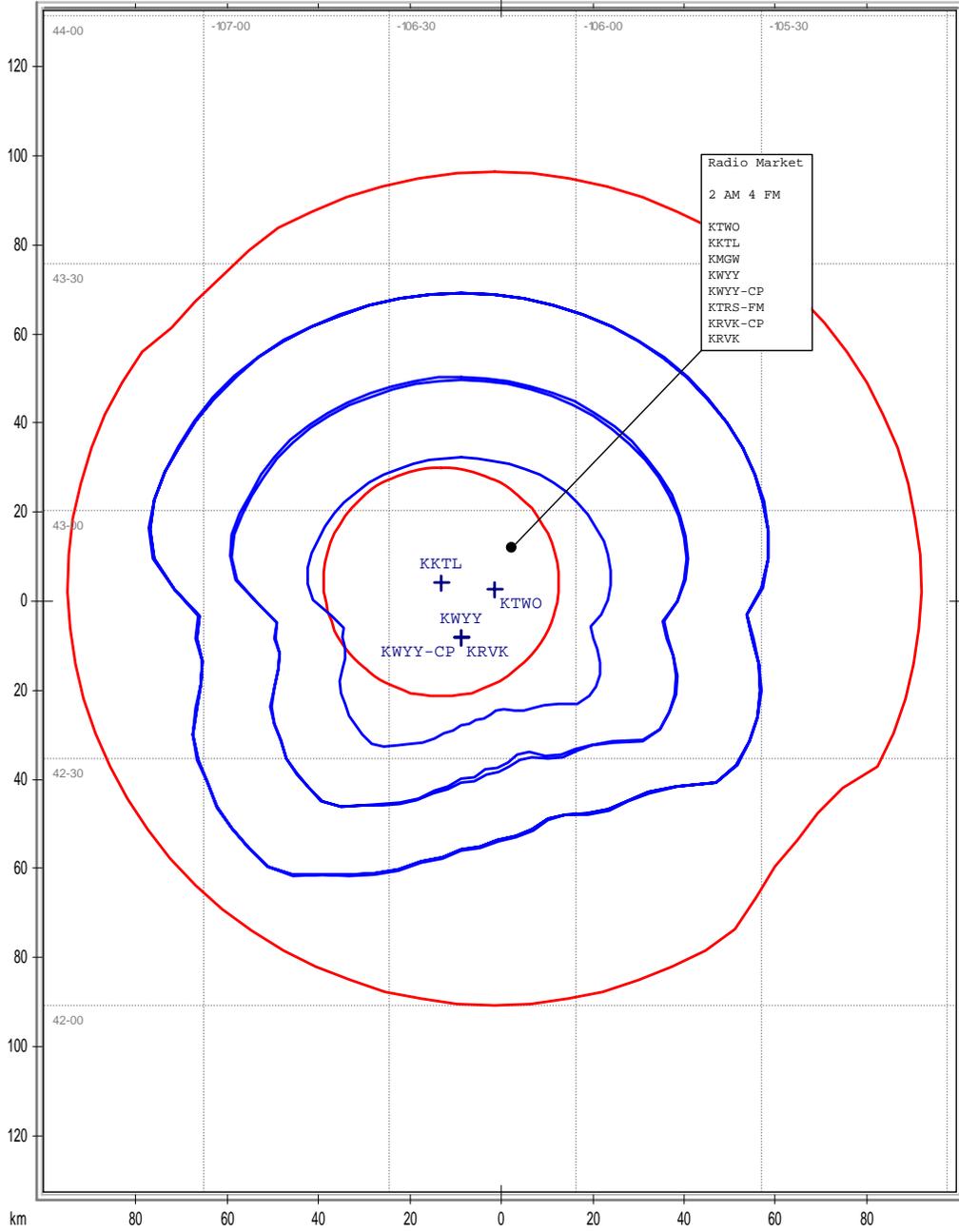
Market

2 AM 4 FM

KTWO (AM)  
KKTL(AM)  
KMGW(FM)  
KWYY(FM)  
KWYY-CP  
KTRS-FM  
KRVK-CP  
KRVK(FM)

# Casper, WY Area

Market-Defining Principal Community Contours



Stations whose principal community contours overlap at least one of the commonly-owned station in the Casper, WY area market.

Count	Call Sign	Facility_id	Licensee
1	KYOD	88501	CANNED HAM COMMUNICATIONS, LLC
2	KTWO	11924	CITICASTERS LICENSES, L.P.
3	KKTL	86873	CITICASTERS LICENSES, L.P.
4	KWYY	26300	CLEAR CHANNEL BROADCASTING LICENSES, INC.
5	KMGW	7360	CLEAR CHANNEL BROADCASTING LICENSES, INC.
6	KTRS-FM	26301	CLEAR CHANNEL BROADCASTING LICENSES, INC.
7	KRVK	88406	CLEAR CHANNEL BROADCASTING LICENSES, INC.
8	KKTY-FM	17411	DOUGLAS BROADCASTING
9	KKTY	38387	DOUGLAS BROADCASTING, INC.
10	KLWC	90985	EDUCATIONAL MEDIA FOUNDATION
11	KGRK	88725	MICHAEL RADIO GROUP, LLC
12	KMLD	11927	MT. RUSHMORE BROADCASTING, INC.
13	KHOC	15925	MT. RUSHMORE BROADCASTING, INC.
14	KQLT	47878	MT. RUSHMORE BROADCASTING, INC.
15	KASS	43477	MT. RUSHMORE BROADCASTING, INC.
16	KVOC	35861	MT. RUSHMORE BROADCASTING, INC.
17	KUWC	82539	UNIVERSITY OF WYOMING
18	KDUW	92622	UNIVERSITY OF WYOMING
19	KCSP-FM	71810	WESTERN INSPIRATIONAL BROADCASTERS, INC.
20	KUYO	11003	WYOMING CHRISTIAN BROADCASTING COMPANY

As noted in the table above, the market defined by the contours of the commonly-owned stations includes at least 20 radio stations. Thus, ownership by the Assignee of the proposed 2 AM/4 FM radio combination complies with the radio ownership rules, which allow common control of 6 stations (of which not more than 4 are in the same service) in a radio market with between 15 and 29 stations.



# FCC Geographic Market Definition for Casper, WY

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KMGW	FM	96.7	C	Mix AC	Casper, WY	07/02/2003	301 p	Gap Broadcasting LLC	Casper, WY	Natrona
KQLT	FM	103.7	C	Country	Casper, WY	07/02/2003	301	Mt Rushmore Broadcasting Inc	Casper, WY	Natrona
KWYY	FM	95.5	C	Country	Casper, WY	07/02/2003	301 p	Gap Broadcasting LLC	Casper, WY	Natrona
KTWO	AM	1030	C	Talk/Sprts	Casper, WY	07/02/2003	301 p	Gap Broadcasting LLC	Casper, WY	Natrona
KUYO	AM	830	C	Chrst/Talk	Casper, WY	07/02/2003	301	Wyoming Christian Broadcasting	Evansville, WY	Natrona
KVOC	AM	1230	C	Sports	Casper, WY	07/02/2003	301	Mt Rushmore Broadcasting Inc	Casper, WY	Natrona
KASS	FM	106.9	C	Clsc Rock	Casper, WY	07/02/2003	301	Mt Rushmore Broadcasting Inc	Casper, WY	Natrona
KTRS	FM	104.7	C	Top 40	Casper, WY	07/02/2003	301 p	Gap Broadcasting LLC	Casper, WY	Natrona
KMLD	FM	94.5	C	Oldies	Casper, WY	07/02/2003	301	Mountain States Radio Inc	Casper, WY	Natrona
KKTL	AM	1400	C	Talk	Casper, WY	07/02/2003	301 p	Gap Broadcasting LLC	Casper, WY	Natrona
KRVK	FM	107.9	C	Clsc Hits	Casper, WY	07/02/2003	301 p	Gap Broadcasting LLC	Midwest, WY	Natrona
KHOC	FM	102.5	C	Hot AC	Casper, WY	07/02/2003	301	Mt Rushmore Broadcasting Inc	Casper, WY	Natrona
KCSP	FM	90.3	NC	ChrsContem	Casper, WY	07/02/2003	301	Western Inspirational Broadcasters Inc	Casper, WY	Natrona
KLWC	FM	89.1	NC	ChrsContem	Casper, WY	10/29/2004	301	Educational Media Foundation	Casper, WY	Natrona
KUWC	FM	91.3	NC	News/Altve	Casper, WY	07/02/2003	301	University of Wyoming	Casper, WY	Natrona

Number of Stations in Geographic Market 15

## Previous Stations in Geographic Market