

Compliance With Radio-Television Cross Ownership Rule

The instant application seeks Commission consent to the transfer of control of the radio stations listed below, licensed to Lieberman Broadcasting of Dallas License LLC (“LBI Dallas Radio”). *The applicants certify that that all parties to the application currently comply, and will comply after consummating this transaction, with the FCC’s multiple ownership and joint ownership rules as those rules existed in 2016 (provided that those rules remain in effect).* The pending application demonstrated compliance with the local radio ownership rule. The application is hereby amended to demonstrate compliance with the radio-television cross-ownership rule, 47 C.F.R. § 73.3555(c)(2)(ii), which was not in effect at the time the application was filed, but which has now been reinstated as a result of the decision issued by the U.S. Court of Appeals for the Third Circuit in the *Prometheus* case.

In simultaneously filed applications, the parent company of LBI Dallas Radio is seeking approval for a long form transfer of control of the licensees of the following radio and television stations located in the Dallas-Fort Worth, Texas area:

KNOR(FM), Krum, TX (Facility ID #36289)
KZZA(FM), Muenster, TX (Facility ID #23017)
KZMP-FM Pilot Point, TX (Facility ID #15854)
KZMP(AM), University Park, TX (Facility ID #63551)
KBOC(FM), Bridgeport, TX (Facility ID #64694)
KMPX(DT), Decatur TX (Facility ID #73701)

As demonstrated below, this combination of radio stations and a single television station complies with the Commission’s radio-television cross ownership rule.

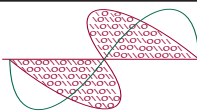
Included as Attachment 1 is a map demonstrating that: (1) the 1 mV/m contours of the FM radio stations LBI Dallas Radio will hold following the proposed transaction encompass the community of license of KMPX(DT); and (2) the principal DTV contour of KMPX(DT) encompasses the entire community of license for the remaining station, KZMP(AM). Thus, the TV/radio cross-ownership rule is triggered for the one television and five radio stations LBI Dallas Radio’s parent company will control in the Dallas-Fort Worth market.

The Commission’s rules permit common ownership of one commercial television and up to seven commercial radio stations (to the extent permitted by the local radio ownership limits) if at least 20 independently owned media voices would remain in the market post-merger.

The BIA printout included as Attachment 2 demonstrates that at least 20 independently owned radio will remain in the Dallas-Fort Worth radio metro market post-merger.¹ The Dallas-Fort Worth DMA also includes a number of independently owned and operating full-power television stations. Thus, a sufficient number of media voices exists in the Dallas-Fort Worth market to permit common ownership of 1 television station and 5 radio stations under the Commission's rules.

¹ As the BIA printout demonstrates, the following independent operators, among others, hold radio licenses in the Dallas-Ft. Worth radio metro: (1) Cumulus, (2) iHeart, (3) Univision, (4) Entercom, (5) Urban One, (6) Liberman Broadcasting, (7) ABC/Disney, (8) Salem Media, (9) Alpha Media, (10) Immaculate Heart Media, (11) LKCM Radio Group, (12) Dallas Broadcasting, (13) Multicultural Radio, (14) Garden City Broadcasting, (15) Border Media Partners, (16) Mortensen Broadcasting Company, (17) Texas FM Radio, (18) SIGA Broadcasting, (19) Farmersville Investments, and (20) Tarrant Radio Broadcasting. TEGNA, Nexstar, Fox, Viacom CBS, Daystar, ION, and NBC Universal, among others, operate full power television stations in the Dallas-Ft. Worth DMA.

ATTACHMENT 1



Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio

Radio-Television Crossownership Dallas, TX

prepared for
**Liberman Television of
Dallas License LLC**

December, 2019

KBOC(FM) Ch. 253C
Bridgeport, TX
60 dBμ

KZZA(FM) Ch. 294C
Muenster, TX
60 dBμ

KNOR(FM) Ch. 229C0
Krum, TX
60 dBμ

KMPX(DT) Ch. 30
Decatur, TX
DTV Service (NLSC) 41 dBμ

Muenster, TX

KZMP-FM Ch. 285C0
Pilot Point, TX
60 dBμ

Pilot Point, TX

Krum, TX

Decatur, TX

Bridgeport, TX

University
Park, TX

KZMP(AM) 1540 kHz
University Park, TX
Daytime 2 mV/m

Scale 1:2,000,000

0 20 40 60 km

ATTACHMENT 2

FCC Geographic Market Definition for Dallas-Ft. Worth, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KAAM	AM	770	C	Chrst/Talk	Dallas-Ft. Worth, TX	07/02/2003	5	Crawford, Donald, Jr	Garland, TX	Dallas
KATH	AM	910	C	Chrst/Talk	Dallas-Ft. Worth, TX	07/02/2003	5	Chatham Hill Foundation Inc	Frisco, TX	Denton
KAWA	FM	89.7	NC	ChrsContem	Dallas-Ft. Worth, TX	07/02/2003	5	WAY-FM Media Group Inc	Sanger, TX	Denton
KBDT	AM	1160	C	Talk	Dallas-Ft. Worth, TX	07/02/2003	5	Dallas Broadcasting LLC	Highland Park, TX	Dallas
KBEC	AM	1390	C	Country	Dallas-Ft. Worth, TX	07/02/2003	5	Faye & Richard Tuck Inc	Waxahachie, TX	Ellis
KBFB	FM	97.9	C	Rhymc/CHR	Dallas-Ft. Worth, TX	07/02/2003	5	Urban One Inc	Dallas, TX	Dallas
KBOC	FM	98.3	C	Span/CHR	Dallas-Ft. Worth, TX	07/02/2003	5	Lieberman Broadcasting Inc	Bridgeport, TX	Wise
KCBI	FM	90.9	NC	ChrsContem	Dallas-Ft. Worth, TX	07/02/2003	5	First Dallas Media Inc	Dallas, TX	Dallas
KCLE	AM	1460	C	Asian	Dallas-Ft. Worth, TX	07/02/2003	5	Intelli LLC	Burleson, TX	Johnson
KDFT	AM	540	C	Span/Chrst	Dallas-Ft. Worth, TX	07/02/2003	5	MultiCultural Radio Broadcasting Inc	Ferris, TX	Dallas
KDGE	FM	102.1	C	Xms/CCT/AC	Dallas-Ft. Worth, TX	07/02/2003	5	iHeartMedia Inc	Fort Worth-Dallas, TX	Tarrant
KDKR	FM	91.3	NC	Relgn/Educ	Dallas-Ft. Worth, TX	07/02/2003	5	Penfold Communications	Decatur, TX	Wise
KDMX	FM	102.9	C	AC	Dallas-Ft. Worth, TX	07/02/2003	5	iHeartMedia Inc	Dallas, TX	Dallas
KDXX	FM	107.9	C	Span/Pop	Dallas-Ft. Worth, TX	07/02/2003	5	Univision	Lewisville, TX	Denton
KEGL	FM	97.1	C	Rock	Dallas-Ft. Worth, TX	07/02/2003	5	iHeartMedia Inc	Fort Worth, TX	Tarrant
KEOM	FM	88.5	NC	Educational	Dallas-Ft. Worth, TX	07/02/2003	5	Mesquite Independent School District	Mesquite, TX	Dallas
KERA	FM	90.1	NC	Nws/Tlk/Inf	Dallas-Ft. Worth, TX	07/02/2003	5	North Texas Public Broadcasting Inc	Dallas, TX	Dallas
KESN	FM	103.3	C	Sports	Dallas-Ft. Worth, TX	07/02/2003	5	ABC/Disney	Allen, TX	Collin
KESS	FM	107.1	C	Span/Pop	Dallas-Ft. Worth, TX	07/02/2003	5	Univision	Benbrook, TX	Tarrant
KEXB	AM	1440	C	Religion	Dallas-Ft. Worth, TX	07/02/2003	5	Immaculate Heart Media Inc	University Park, TX	Dallas
KFCD	AM	990	C	Span/Chrst	Dallas-Ft. Worth, TX	07/02/2003	5	Farmersville Investments LLC	Farmersville, TX	Collin
KFJZ	AM	870	C	South Asian	Dallas-Ft. Worth, TX	07/02/2003	5	SIGA Broadcasting Corporation	Fort Worth, TX	Tarrant
KFLC	AM	1270	C	Span/Sprts	Dallas-Ft. Worth, TX	07/02/2003	5	Univision	Benbrook, TX	Tarrant
KFWR	FM	95.9	C	Country	Dallas-Ft. Worth, TX	07/02/2003	5	LKCM Radio Group LP	Jacksboro, TX	Jack
KFXR	AM	1190	C	Talk	Dallas-Ft. Worth, TX	07/02/2003	5	iHeartMedia Inc	Dallas, TX	Dallas
KFZO	FM	99.1	C	Mexican	Dallas-Ft. Worth, TX	07/02/2003	5	Univision	Denton, TX	Denton
KGGR	AM	1040	C	Gospel	Dallas-Ft. Worth, TX	07/02/2003	5	Mortenson Broadcasting Company Incorporated	Dallas, TX	Dallas
KHFX	AM	1140	C	Span/Relgn	Dallas-Ft. Worth, TX	07/02/2003	5	SIGA Broadcasting Corporation	Cleburne, TX	Johnson
KHKS	FM	106.1	C	CHR	Dallas-Ft. Worth, TX	07/02/2003	5	iHeartMedia Inc	Denton, TX	Denton
KHSE	AM	700	C	South Asian	Dallas-Ft. Worth, TX	10/20/2004	5	Texas FM Radio LLC	Wylie, TX	Collin
KHVN	AM	970	C	Gospel	Dallas-Ft. Worth, TX	07/02/2003	5	Mortenson Broadcasting Company Incorporated	Fort Worth, TX	Tarrant
KHYI	FM	95.3	C	Amerc/Cntry	Dallas-Ft. Worth, TX	07/02/2003	5	Metro Broadcasters-TX Inc	Howe, TX	Grayson
KJKK	FM	100.3	C	Adult Hits	Dallas-Ft. Worth, TX	07/02/2003	5	Entercom	Dallas, TX	Dallas
KJON	AM	850	C	Spn/Cst/Tlk	Dallas-Ft. Worth, TX	07/02/2003	5	Chatham Hill Foundation Inc	Carrollton, TX	Collin

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

FCC Geographic Market Definition for Dallas-Ft. Worth, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KJRN	FM	88.3	NC	ChrsContem	Dallas-Ft. Worth, TX	07/02/2003	5	Southwestern Adventist University	Keene, TX	Johnson
KKDA	AM	730	C	Korean	Dallas-Ft. Worth, TX	07/02/2003	5	SKR Partners LLC	Grand Prairie, TX	Dallas
KKDA	FM	104.5	C	Urban	Dallas-Ft. Worth, TX	07/02/2003	5	Service Broadcasting Group LLC	Dallas, TX	Dallas
KKGM	AM	1630	C	Sothn Gspel	Dallas-Ft. Worth, TX	07/02/2003	5	Mortenson Broadcasting Company Incorporated	Fort Worth, TX	Tarrant
KKLF	AM	1700	C	Span/Sprts	Dallas-Ft. Worth, TX	03/15/2005	5	Benavides, Gerald	Richardson, TX	Dallas
KKXT	FM	91.7	NC	AAA	Dallas-Ft. Worth, TX	07/02/2003	5	North Texas Public Broadcasting Inc	Dallas, TX	Dallas
KLAK	FM	97.5	C	AC	Dallas-Ft. Worth, TX	06/30/2006	5	Alpha Media	Tom Bean, TX	Grayson
KLIF	AM	570	C	News/Talk	Dallas-Ft. Worth, TX	07/02/2003	5	Cumulus Media Holdings Inc	Dallas, TX	Dallas
KLIF	FM	93.3	C	Urban	Dallas-Ft. Worth, TX	07/02/2003	5	Cumulus Media Holdings Inc	Haltom City, TX	Tarrant
KLNO	FM	94.1	C	Mexican	Dallas-Ft. Worth, TX	07/02/2003	5	Univision	Fort Worth, TX	Tarrant
KLOW	FM	98.9	C	ChrsContem	Dallas-Ft. Worth, TX	06/01/2009	5	Vision Media Group Inc	Reno, TX	Parker
KLTY	FM	94.9	C	Xmas/CCtm	Dallas-Ft. Worth, TX	07/02/2003	5	Salem Media Group Inc	Arlington, TX	Tarrant
KLUV	FM	98.7	C	Clsc Hits	Dallas-Ft. Worth, TX	07/02/2003	5	Entercom	Dallas, TX	Dallas
KMNY	AM	1360	C	Span/CCtm	Dallas-Ft. Worth, TX	07/02/2003	5	MultiCultural Radio Broadcasting Inc	Hurst, TX	Tarrant
KMQX	FM	88.5	NC	Adult Hits	Dallas-Ft. Worth, TX	11/24/2003	5	CSSI Non Profit Educational Broadcasting Corp	Weatherford, TX	Parker
KMVK	FM	107.5	C	Mexican	Dallas-Ft. Worth, TX	07/02/2003	5	Entercom	Fort Worth, TX	Tarrant
KNGO	AM	1480	C	Span/Relgn	Dallas-Ft. Worth, TX	07/02/2003	5	Hammond Broadcasting LLC	Dallas, TX	Dallas
KNON	FM	89.3	NC	Variety	Dallas-Ft. Worth, TX	07/02/2003	5	Agape Broadcasting Foundation Inc	Dallas, TX	Dallas
KNOR	FM	93.7	C	Mexican	Dallas-Ft. Worth, TX	07/02/2003	5	Liberman Broadcasting Inc	Krum, TX	Denton
KNTU	FM	88.1	NC	Jazz/Varty	Dallas-Ft. Worth, TX	07/02/2003	5	University of North Texas	McKinney, TX	Collin
KOME	FM	95.3	C	Clsc Hits	Dallas-Ft. Worth, TX	07/05/2019	5	Chisholm Trail Communications LLC	Meridian, TX	Bosque
KPIR	AM	1420	C	Nws/Tik/Cty	Dallas-Ft. Worth, TX	07/02/2003	5	KPIR Granbury LLC	Granbury, TX	Hood
KPLX	FM	99.5	C	Country	Dallas-Ft. Worth, TX	07/02/2003	5	Cumulus Media Holdings Inc	Fort Worth, TX	Tarrant
KPYK	AM	1570	C	BgBnd/AdSt	Dallas-Ft. Worth, TX	07/02/2003	5	Mohnkern Electronics Inc	Terrell, TX	Kaufman
KRLD	FM	105.3	C	Sports	Dallas-Ft. Worth, TX	07/02/2003	5	Entercom	Dallas, TX	Dallas
KRLD	AM	1080	C	News/Talk	Dallas-Ft. Worth, TX	07/02/2003	5	Entercom	Dallas, TX	Dallas
KRNB	FM	105.7	C	Rhythm/Blu	Dallas-Ft. Worth, TX	07/02/2003	5	Service Broadcasting Group LLC	Decatur, TX	Wise
KRVA	AM	1600	C	Asian	Dallas-Ft. Worth, TX	07/02/2003	5	LRAD Media LLC	Cockrell Hill, TX	Dallas
KRVF	FM	106.9	C	Country	Dallas-Ft. Worth, TX	07/02/2003	5	LKCM Radio Group LP	Kerens, TX	Kaufman
KSCS	FM	96.3	C	Country	Dallas-Ft. Worth, TX	07/02/2003	5	Cumulus Media Holdings Inc	Fort Worth, TX	Tarrant
KSKY	AM	660	C	News/Talk	Dallas-Ft. Worth, TX	07/02/2003	5	Salem Media Group Inc	Balch Springs, TX	Dallas
KSQX	FM	89.1	NC	Religion	Dallas-Ft. Worth, TX	07/02/2003	5	Brazos TV Incorporated	Springtown, TX	Parker
KTCK	AM	1310	C	Sports	Dallas-Ft. Worth, TX	07/02/2003	5	Cumulus Media Holdings Inc	Dallas, TX	Dallas
KTCK	FM	96.7	C	Sports	Dallas-Ft. Worth, TX	07/02/2003	5	Cumulus Media Holdings Inc	Flower Mound, TX	Denton

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FCC Geographic Market Definition for Dallas-Ft. Worth, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KTCU	FM	88.7	NC	AAA/Altve	Dallas-Ft. Worth, TX	07/02/2003	5	Texas Christian University	Fort Worth, TX	Tarrant
KTFW	FM	92.1	C	Country	Dallas-Ft. Worth, TX	06/13/2008	5	LKCM Radio Group LP	Glen Rose, TX	Somervell
KTMU	FM	88.7	NC	DARK	Dallas-Ft. Worth, TX	01/06/2012	5	South Central Oklahoma Christian Broadcasting	Muenster, TX	Cooke
KTNO	AM	620	C	Span/Chrst	Dallas-Ft. Worth, TX	07/02/2003	5	Salem Media Group Inc	Plano, TX	Collin
KTRL	FM	90.5	NC	NPR/Cls/Jaz	Dallas-Ft. Worth, TX	05/18/2010	5	Tarleton State University	Stephenville, TX	Erath
KTXG	FM	90.5	NC	Chrst/Talk	Dallas-Ft. Worth, TX	11/05/2007	5	American Family Association Incorporated	Greenville, TX	Hunt
KTXV	AM	890	C	DARK	Dallas-Ft. Worth, TX		5	p Radio Punjab Dallas LLC	Mabank, TX	Kaufman
KVIL	FM	103.7	C	Alternative	Dallas-Ft. Worth, TX	07/02/2003	5	Entercom	Highland Park-Dallas, TX	Dallas
KVTT	AM	1110	C	South Asian	Dallas-Ft. Worth, TX	07/17/2009	5	Decatur Media Land LLC	Mineral Wells, TX	Palo Pinto
KWRD	FM	100.7	C	Chrst/Talk	Dallas-Ft. Worth, TX	08/02/2003	5	Salem Media Group Inc	Highland Village, TX	Denton
KXEZ	FM	92.1	C	Country	Dallas-Ft. Worth, TX	07/02/2003	5	Metro Broadcasters-TX Inc	Farmersville, TX	Collin
KYDA	FM	101.7	NC	Chrst/Altve	Dallas-Ft. Worth, TX	07/02/2003	5	Educational Media Foundation	Azle, TX	Tarrant
KYQX	FM	89.3	NC	Country	Dallas-Ft. Worth, TX	07/02/2003	5	CSSI Non Profit Educational Broadcasting Corp	Mineral Wells, TX	Palo Pinto
KZEE	AM	1220	C	South Asian	Dallas-Ft. Worth, TX	07/02/2003	5	Tarrant Radio Broadcasting Inc	Weatherford, TX	Parker
KZMJ	FM	94.5	C	Urban AC	Dallas-Ft. Worth, TX	07/02/2003	5	Urban One Inc	Gainesville, TX	Cooke
KZMP	FM	104.9	C	South Asian	Dallas-Ft. Worth, TX	07/02/2003	5	Lieberman Broadcasting Inc	Pilot Point, TX	Denton
KZMP	AM	1540	C	Span/AdHts	Dallas-Ft. Worth, TX	07/02/2003	5	Lieberman Broadcasting Inc	University Park, TX	Dallas
KZPS	FM	92.5	C	Clsc Rock	Dallas-Ft. Worth, TX	07/02/2003	5	iHeartMedia Inc	Dallas, TX	Dallas
KZZA	FM	106.7	C	Span/AdHts	Dallas-Ft. Worth, TX	07/02/2003	5	Lieberman Broadcasting Inc	Muenster, TX	Cooke
WBAP	AM	820	C	News/Talk	Dallas-Ft. Worth, TX	07/02/2003	5	Cumulus Media Holdings Inc	Fort Worth, TX	Tarrant
WRR	FM	101.1	C	Classical	Dallas-Ft. Worth, TX	07/02/2003	5	City of Dallas	Dallas, TX	Dallas

Number of Stations in Geographic Market 89

Previous Stations in Geographic Market

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed