

## **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

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<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.

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<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).

## Yakima, WA Area

Commonly owned Yakima, WA Area stations included in this study:

Call Sign	Facility_id
KATS	64397
KFFM	49723
KDBL	64507
KQSN	88006
KIT	64398
KUTI	49722

Contour market created by the commonly-owned stations:

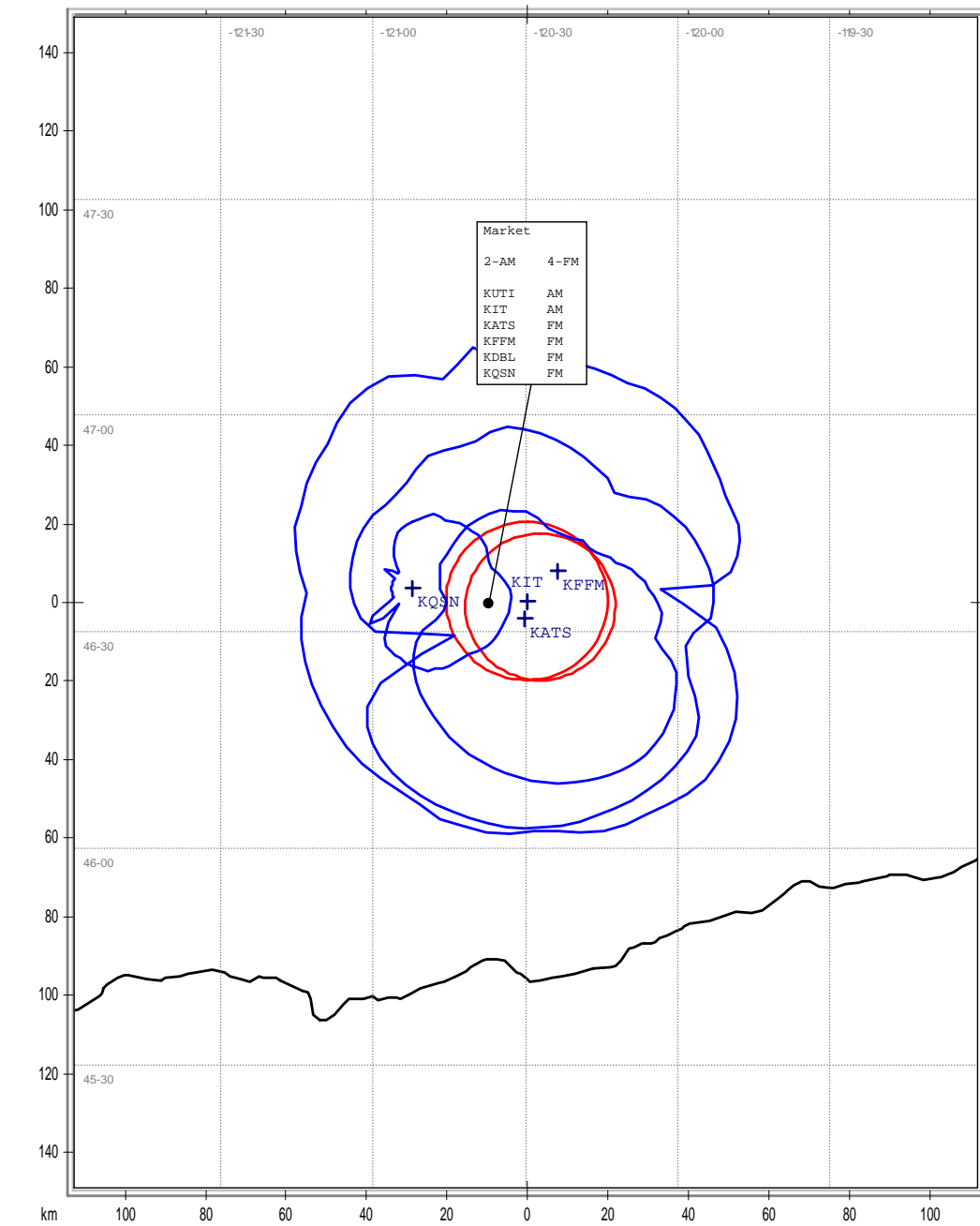
Market

2 AM/4 FM

KATS  
KFFM  
KDBL  
KQSN  
KIT  
KUTI

# Yakima, WA Area

Market-Defining Principal Community Contours



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

Market

Count	Call Sign	Fac ID	Licensee
1	KUTI	49722	CITICASTERS LICENSES, L.P.
2	KIT	64398	CITICASTERS LICENSES, L.P.
3	KFFM	49723	CITICASTERS LICENSES, L.P.
4	KATS	64397	CITICASTERS LICENSES, L.P.
5	KDBL	64507	CITICASTERS LICENSES, L.P.
6	KQSN	88006	CAPSTAR TX LIMITED PARTNERSHIP
7	KQBE	52035	PEAK COMMUNICATIONS, INC.
8	KYVT	74320	YAKIMA DISTRICT NO. 7
9	KSBC	83463	EDUCATIONAL MEDIA FOUNDATION
10	KMNA	21602	MBPROSSER LICENSEE LLC
11	KHHK	36031	NEW NORTHWEST BROADCASTERS, LLC
12	KNWY	71031	WASHINGTON STATE UNIVERSITY
13	KXDD	7919	NEW NORTHWEST BROADCASTERS, LLC
14	KDNA	49729	NORTHWEST COMMUNITIES EDUCATION CENTER BUSTOS MEDIA OF EASTERN WASHINGTON LICENSE, LLC
15	KZTA	36006	LLC
16	KARY-FM	53674	NEW NORTHWEST BROADCASTERS, LLC
17	KAYB	78191	AMERICAN FAMILY ASSOCIATION
18	KSOH	10023	LIFETALK RADIO, INC.
19	KRSE	49876	NEW NORTHWEST BROADCASTERS, LLC
20	KYPL	25466	GROWING CHRISTIAN FOUNDATION
21	KPQ-FM	71524	WESCOAST BROADCASTING
22	KNWR	71028	WASHINGTON STATE UNIVERSITY
23	KCWU	87833	TRUSTEES OF CENTRAL WASHINGTON UNIVERSITY
24	KCSH	81756	LIFETALK RADIO, INC.
25	KXAA	87569	WHEELER BROADCASTING, INC.
26	KXLE-FM	35957	KXLE, INC.
27	KLES	6266	MBPROSSER LICENSEE LLC

As noted in the table above, the market defined by the contours of the commonly-owned stations includes at least 27 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 Yakima, WA

Call Letters	AM/FM	Type	Station	Format	Home Market	Market			City & State of License	County of License
						Designntn	Home Mkt	Owner		
						Date	Rank			
KMNA	FM	98.7	C	Mexican	Yakima, WA	07/02/2003	200	p Churchill Communications LLC	Mabton, WA	Yakima
KYAK	AM	930	C	Religion	Yakima, WA	07/02/2003	200	Read Broadcasting Network	Yakima, WA	Yakima
KZTA	FM	96.9	C	Mexican	Yakima, WA	07/02/2003	200	Bustos Media Enterprises LLC	Naches, WA	Yakima
KZXR	AM	1310	C	Nws/Tlk/Spt	Yakima, WA	04/23/2003	200	p Churchill Communications LLC	Prosser, WA	Benton
KATS	FM	94.5	C	Modern	Yakima, WA	07/02/2003	200	p Clear Channel	Yakima, WA	Yakima
KBBO	AM	980	C	Tlk/Nws/Inf	Yakima, WA	07/02/2003	200	New Northwest Broadcasters, LLC	Selah, WA	Yakima
KYNR	AM	1490	C	VarHt/Ethnc	Yakima, WA	07/02/2003	200	Yakima Nation Confederated Tribes & Bands	Toppenish, WA	Yakima
KQSN	FM	99.3	C	Span/Nstlg	Yakima, WA	07/02/2003	200	p Clear Channel	Naches, WA	Yakima
KFFM	FM	107.3	C	CHR	Yakima, WA	07/02/2003	200	p Clear Channel	Yakima, WA	Yakima
KIT	AM	1280	C	News/Talk	Yakima, WA	07/02/2003	200	p Clear Channel	Yakima, WA	Yakima
KUTI	AM	1460	C	Country	Yakima, WA	07/02/2003	200	p Clear Channel	Yakima, WA	Yakima
KZTS	AM	1230	C	Spanish AC	Yakima, WA	07/02/2003	200	Bustos Media Enterprises LLC	Sunnyside, WA	Yakima
KRSE	FM	105.7	C	80s & 90s	Yakima, WA	07/02/2003	200	New Northwest Broadcasters, LLC	Yakima, WA	Yakima
KJOX	AM	1390	C	Sprts/Talk	Yakima, WA	07/02/2003	200	New Northwest Broadcasters, LLC	Yakima, WA	Yakima
KXDD	FM	104.1	C	Country	Yakima, WA	07/02/2003	200	New Northwest Broadcasters, LLC	Yakima, WA	Yakima
KYXE	AM	1020	C	Spanish AC	Yakima, WA	07/02/2003	200	Bustos Media Enterprises LLC	Union Gap, WA	Yakima
KHHK	FM	99.7	C	CHR	Yakima, WA	07/02/2003	200	New Northwest Broadcasters, LLC	Yakima, WA	Yakima
KARY	FM	100.9	C	Oldies	Yakima, WA	07/02/2003	200	New Northwest Broadcasters, LLC	Yakima, WA	Yakima
KLES	FM	101.7	C	Spanish AC	Yakima, WA	07/02/2003	200	p Churchill Communications LLC	Grandview, WA	Yakima
KDBL	FM	92.9	C	Country	Yakima, WA	07/02/2003	200	p Clear Channel	Prosser, WA	Benton
KAYB	FM	88.1	NC	Christian	Yakima, WA	07/02/2003	200	American Family Association Incorporated	Toppenish, WA	Yakima
KDNA	FM	91.9	NC	Spn/Edu/Pb	Yakima, WA	07/02/2003	200	Northwest Communities Educational Center	Sunnyside, WA	Yakima
KSBC	FM	88.1	NC	ChrsContem	Yakima, WA	07/02/2003	200	Educational Media Foundation	Yakima, WA	Yakima
KNWY	FM	90.3	NC	Clsci/NPR	Yakima, WA	07/02/2003	200	Washington State University	Nile, WA	Yakima
KSOH	FM	89.5	NC	Christian	Yakima, WA	07/02/2003	200	LifeTalk Radio Inc	Yakima, WA	Yakima
KYPL	FM	91.1	NC	ChrsContem	Yakima, WA	07/02/2003	200	Growing Christian Foundation	Wapato, WA	Yakima
KYVT	FM	88.5	NC	Alternative	Yakima, WA	07/02/2003	200	Yakima School District #7	Yakima, WA	Yakima

Number of Stations in Geographic Market 27

### Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed