

DEMONSTRATION OF COMPLIANCE WITH MULTIPLE OWNERSHIP RULES

Rincon Broadcasting LS2 LLC (“Rincon 2”), the licensee of KSBL(FM), Carpinteria, California, hereby demonstrates that the instant modification application fully complies with the Commission’s multiple ownership regulations.¹

KSBL(FM) is “home” to the Arbitron Santa Barbara radio market. Rincon 2 itself is not the licensee of any other radio stations in this market; however, Rincon Broadcasting LS LLC (“Rincon”), Rincon 2’s commonly owned affiliate, is the licensee of three additional FM radio stations and two AM radio stations in the Arbitron Santa Barbara radio market: KIST-FM, Carpinteria, California; KFYZ, Ellwood, California; KTYD(FM), Santa Barbara, California; KSPE(AM), Santa Barbara, California; and KTMS(AM), Santa Barbara, California.² Neither Rincon 2, Rincon, nor any party to this application has any other attributable ownership interests, whether by ownership, LMA, or JSA, in any other station in the Santa Barbara market.

The most recent available Arbitron data for the Santa Barbara radio market reveals that there are 17 commercial and noncommercial radio stations in the market. *See* the BIA FCC Geographic Market Definition for Santa Barbara, attached hereto.³ Under the new broadcast multiple ownership rules, in a radio market with between 15 and 29 commercial and noncommercial radio stations, an entity may lawfully own, operate, and control up to 6 radio stations, only 4 of which may be in one class. Accordingly, Rincon 2 and Rincon’s ownership of four FM stations and two AM stations in the market is fully compliant with the multiple ownership rules.

¹ See 2002 Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996 et al., Report and Order and Notice of Proposed Rulemaking, FCC 03-127, aff’d in part and remanded in part, *Prometheus Radio Project, et al. v. FCC*, 373 F.3d 372 (3rd Cir. 2004), stay modified, No. 03-3388 (Sept. 3, 2004) (“Report and Order”).

² Rincon 2 is proposing to change the city of license of KSBL in this application. However, both the licensed and proposed cities of license are contained in the Arbitron Santa Barbara radio market.

³ The attached list indicates that Rincon and Rincon 2’s six stations in the market are “owned” by Point Broadcasting Company (“Point”). Point is the parent company of Rincon 2 and Rincon, which are actually the station licensees.



FCC Geographic Market Definition for Santa Barbara, CA

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market		Owner	City & State of License	County of License
							Designn	Home Mkt Rank			
KCLU	AM	1340	NC	NPR/News/Inf	Santa Barbara, CA	Santa Barbara, CA	07/01/2003	207	California Lutheran University	Santa Barbara, CA	Santa Barbara
KCSB	FM	91.9	NC	Vary/Ecltc	Santa Barbara, CA	Santa Barbara, CA	07/02/2003	207	University of California Regents	Santa Barbara, CA	Santa Barbara
KDB	FM	93.7	C	Classical	Santa Barbara, CA	Santa Barbara, CA	07/02/2003	207	University of Southern California	Santa Barbara, CA	Santa Barbara
KDRW	FM	88.7	NC	Classical	Santa Barbara, CA	Santa Barbara, CA	07/02/2003	207	Santa Monica Comm College	Santa Barbara, CA	Santa Barbara
KFVZ	FM	94.5	C	CHR	Santa Barbara, CA	Santa Barbara, CA	07/02/2003	207	Point Broadcasting Company	Ellwood, CA	Santa Barbara
KIST	FM	107.7	C	Mexican	Santa Barbara, CA	Santa Barbara, CA	07/02/2003	207	Point Broadcasting Company	Santa Barbara, CA	Santa Barbara
KJEE	FM	92.9	C	Modern Rock	Santa Barbara, CA	Santa Barbara, CA	07/02/2003	207	Montecito FM Inc	Montecito, CA	Santa Barbara
KRAZ	FM	105.9	C	Country	Santa Barbara, CA	Santa Barbara, CA	07/02/2003	207	Knight Broadcasting Inc	Santa Ynez, CA	Santa Barbara
KSBL	FM	101.7	C	AC	Santa Barbara, CA	Santa Barbara, CA	07/02/2003	207	Point Broadcasting Company	Carpinteria, CA	Santa Barbara
KSBX	FM	89.5	NC	NPR	Santa Barbara, CA	Santa Barbara, CA	01/06/2004	207	KCBX Inc	Santa Barbara, CA	Santa Barbara
KSPE	AM	1490	C	Span/AdHts	Santa Barbara, CA	Santa Barbara, CA	07/02/2003	207	Point Broadcasting Company	Santa Barbara, CA	Santa Barbara
KTMS	AM	990	C	News/Talk	Santa Barbara, CA	Santa Barbara, CA	07/02/2003	207	Point Broadcasting Company	Santa Barbara, CA	Santa Barbara
KTYD	FM	99.9	C	AOR	Santa Barbara, CA	Santa Barbara, CA	07/02/2003	207	Point Broadcasting Company	Santa Barbara, CA	Santa Barbara
KVVB	FM	103.3	C	Hip Hop	Oxnard-Ventura, CA	Oxnard-Ventura, CA	07/27/2005	121	Cumulus Media Holdings Inc	Santa Barbara, CA	Santa Barbara
KYGA	FM	97.5	NC	Chrst/Alive	Santa Barbara, CA	Santa Barbara, CA	07/02/2003	207	Educational Media Foundation	Goleta, CA	Santa Barbara
KZER	AM	1250	C	Mexican	Santa Barbara, CA	Santa Barbara, CA	07/02/2003	207	Lazer Broadcasting Corporation	Santa Barbara, CA	Santa Barbara
KZSB	AM	1290	C	News/Talk	Santa Barbara, CA	Santa Barbara, CA	07/02/2003	207	Santa Barbara Broadcasting Inc	Santa Barbara, CA	Santa Barbara

Number of Stations in Geographic Market 17

Previous Stations in Geographic Market

KRRF	FM	106.3	C	Country	Oxnard-Ventura, CA	04/02/2013	121	Cumulus Media Holdings Inc	Oak View, CA	Ventura
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"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed