

Exhibit 5 - Multiple Ownership Compliance Showing

Ramar Communications, Inc. (“Ramar”) was the winning bidder in Auction 88 for a new FM station at Idalou, Texas. On October 6, 2010 the Commission granted Ramar’s Form 301 application for a construction permit for that Idalou station (BPH-19971016MJ). The station to be built now has the call sign KLBB-FM, and Ramar here seeks to modify the KLBB-FM facilities. This exhibit essentially repeats the showing previously approved by the Commission and demonstrates that the common ownership of this new FM station and the following stations already licensed to Ramar continues to comply with both the local radio ownership rule and the radio-television cross ownership rule.

Ramar is the licensee of the following stations relevant to this analysis:

| Call Sign | Community of License | Facility ID |
|-----------|----------------------|-------------|
| KTTU-FM   | Brownfield, Texas    | 61581       |
| KJTV(AM)  | Lubbock, Texas       | 55061       |
| KXTQ-FM   | Lubbock, Texas       | 55062       |
| KLZK(FM)  | New Deal, Texas      | 54684       |
| KJTV-TV   | Lubbock, Texas       | 55031       |

Compliance with the Local Radio Ownership Rule

KLBB-FM is authorized to serve Idalou, Texas. Idalou is located in Lubbock County. Therefore, for purposes of the local radio ownership rule, the new FM station is deemed to be a part of the Lubbock, Texas Arbitron Metro. Attachment A hereto was

compiled on January 27, 2012 using BIA Research, Inc.'s *Media Access Pro* database.

Attachment A lists all radio stations that are licensed to communities within Lubbock County, the county that comprises the Lubbock, Texas Metro, or that Arbitron designates as "home" to that Metro. As demonstrated in Attachment A, there are 27 stations in the Lubbock, Texas Metro, as so defined. Under the local radio ownership rule, a person or single entity (or entities under common control) in a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations may have a cognizable interest in up to 6 commercial radio stations (not more than 4 of which are in the same service (AM or FM)).

As shown in Attachment A, Ramar currently controls 4 licensed radio stations that are either located in or considered home to the Lubbock, Texas Metro (1 AM and 3 FM). The addition of KLBB-FM results in Ramar controlling 5 radio stations (1 AM and 4 FM) within the Lubbock, Texas Metro, which fully complies with the local radio ownership rule.

Brownfield, Texas, the community of license Ramar's KTTU-FM, is located in Terry County, which is not included in any radio Metro market, as defined by Arbitron. However, KTTU-FM is considered "home" to the Lubbock, Texas Metro. Accordingly, a showing of compliance using the interim contour-overlap methodology also is provided in Attachment B hereto. That showing indicates that the contours of 37 radio stations overlap the radio market defined by the overlapping contours of the five radio stations owned by Ramar. A person or single entity (or entities under common control) in a radio market with between 30 and 44 (inclusive) full-power, commercial and noncommercial

radio stations may have a cognizable interest in up to 7 commercial radio stations (not more than 4 of which are in the same service (AM or FM)). Ramar's ownership of the 1 AM and 4 FM stations identified herein fully complies with the local radio ownership rule as determined by the interim contour-overlap methodology as well.

Compliance with the Radio-Television Cross Ownership Rule

The common ownership of KJTV-TV and KLBB-FM implicates the radio-television cross ownership rule as currently applied by the Commission.

The radio-television cross ownership rule is triggered when either (i) the Grade A contour of a television station encompasses the community of license of a commonly owned radio station, or (ii) when the 1 mV/m contour of an FM station or the 2 mV/m contour of an AM station encompasses the community of license of a commonly owned television station. Once the radio-television cross ownership rule has been triggered, the number of independently owned and operated television stations in a market is determined on the basis of Grade B contour overlap. However, because digital television stations no longer have analog Grade A or Grade B contours by which to determine compliance with the radio-television cross ownership rule and the FCC has not yet modified that rule to specify contours that are applicable to DTV service, the Media Bureau has applied a methodology based on the digital noise limited service contour ("NLSC") to assess compliance. *Application for Transfer of Control of Nassau Broadcasting II, L.L.C.*, 25 FCC Rcd 1851 (2010).

As demonstrated on the contour overlap study included in Attachment B, the NLSC (41 dBu) for KJTV-TV encompasses the entire community of Idalou, Texas, and

the 1 mV/m (60 dBu) contour of the new FM at Idalou encompasses all of Lubbock, Texas, the community of license of KJTV-TV.

Although the radio-television cross ownership rule is triggered by contour encompassment, the Commission determines compliance with the rule on an Arbitron Metro basis.

Under the radio-television cross ownership rule, an entity may control up to one commercial television station and seven commercial radio stations in an Arbitron Metro market if at least 20 independently owned and operated media voices would remain in the market post-acquisition. *See* 47 C.F.R. § 73.3555(c)(2)(i) (2002). As the charts provided in Attachment C hereto (compiled on January 26, 2012) indicate, there will be at least 20 independently owned and operated media voices in the Lubbock, Texas Metro following the grant of the instant application. Specifically, there will be at least 13 independent radio voices, five independent television voices,<sup>1</sup> one independent newspaper voice and one independent cable system voice. As a result, Ramar's attributable interest in KJTV-TV, its four existing commercial radio stations (KTTU-FM, KJTV(AM), KXTQ-FM and KLZK(FM)) and KLBB-FM fully complies with the radio-television cross ownership rule. In granting BPH-19971016MJ, the Commission approved a showing that was identical in all material respects to the radio-television cross-ownership compliance showing set forth above.

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<sup>1</sup> Attachment B contains a map depicting the NLSC of the television stations in the Lubbock, Texas DMA that overlap the NLSC of KJTV-TV.