

**Exhibit 15**

**Compliance with Local Radio Ownership Rule (47 C.F.R. § 73.3555(a))**

By this application, KZIA, Inc. (“KZIA”) is requesting FCC consent to its proposed acquisition of the license for KCRG(AM), Cedar Rapids, Iowa, from Cedar Rapids Television Company (“Cedar”).

BIA reports that KCRG(AM) is “home” to the Cedar Rapids, IA Metro Market (“Cedar Rapids Metro Market”) and its’ community of license, Cedar Rapids, is located inside the geographic boundaries of the Cedar Rapids Metro Market. As required by the instructions and worksheets to the Form 314, this exhibit demonstrates compliance of KZIA’s proposed acquisition of the license for KCRG(AM) with the FCC’s local radio ownership rules under the Arbitron Metro methodology.

As noted, KCRG(AM) is reported by BIA as “home” to the Cedar Rapids Metro Market.<sup>1</sup> KZIA currently owns one radio station that either has communities of license located within the Cedar Rapids Metro Market or are “home” to the Metro Market:

1. KZIA(FM), Cedar Rapids, IA

BIA and FCC data together confirms that there are fourteen commercial and noncommercial stations in the Cedar Rapids Metro Market. BIA reports eleven full-power, commercial radio stations as located within or “home” to the Cedar Rapids Metro Market and three noncommercial radio stations have communities of licenses located within the Cedar Rapids Metro Market.<sup>2</sup> Under the Commission’s local radio ownership limits as set forth at 47 C.F.R. § 73.3555(a)(1)(iv), in a radio market with fourteen or fewer full-power, commercial and noncommercial radio stations, a party may have a cognizable interest in up to five full-power, commercial radio stations, not more than three of which are in the same service (AM or FM). KZIA’s acquisition of the license for KCRG(AM) would result in its ownership of two full-power commercial radio stations (one FM station and one AM station) in the Cedar Rapids Metro Market, which is fewer than the maximum radio stations permitted for a market of that size. Accordingly, KZIA’s acquisition and ownership of KCRG(AM) would comply with the FCC’s local radio ownership limits under the Arbitron Metro Market methodology.

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<sup>1</sup> See BIA Financial Network, *2006 Investing in Radio Market Report*, 1st Ed., “Cedar Rapids, IA Market Overview,” Metro Rank 214 (2006) (“*BIA Market Report*”).

<sup>2</sup> These noncommercial stations are KCCK(FM), Cedar Rapids, Iowa; KRNL(FM), Mount Vernon, Iowa; and KWOF(FM), Hiawatha, Iowa.



### FCC Geographic Market Definition for Cedar Rapids, IA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KMRY	AM	1450	C	Adlt Stndrd	Cedar Rapids, IA	07/02/2003	214	Sellers Broadcasting Incorporated	Cedar Rapids, IA	Linn
KCRG	AM	1600	C	Sports	Cedar Rapids, IA	07/02/2003	214	Gazette Communications	Cedar Rapids, IA	Linn
KMJM	AM	1360	C	Sports	Cedar Rapids, IA	07/02/2003	214	Clear Channel Communications	Cedar Rapids, IA	Linn
KHAK	FM	98.1	C	Country	Cedar Rapids, IA	07/02/2003	214	Cumulus Broadcasting Inc	Cedar Rapids, IA	Linn
KKRQ	FM	100.7	C	Clsc Hits	Cedar Rapids, IA	07/02/2003	214	Clear Channel Communications	Iowa City, IA	Johnson
KZIA	FM	102.9	C	CHR	Cedar Rapids, IA	07/02/2003	214	KZIA Inc	Cedar Rapids, IA	Linn
KRNA	FM	94.1	C	Rock	Cedar Rapids, IA	07/02/2003	214	Cumulus Broadcasting Inc	Iowa City, IA	Johnson
KDAT	FM	104.5	C	Soft Rock	Cedar Rapids, IA	07/02/2003	214	Cumulus Broadcasting Inc	Cedar Rapids, IA	Linn
KXIC	AM	800	C	Nws/Tlk/Spt	Cedar Rapids, IA	07/02/2003	214	Clear Channel Communications	Iowa City, IA	Johnson
WMT	AM	600	C	News/Talk	Cedar Rapids, IA	07/02/2003	214	Clear Channel Communications	Cedar Rapids, IA	Linn
WMT	FM	96.5	C	AC	Cedar Rapids, IA	07/02/2003	214	Clear Channel Communications	Cedar Rapids, IA	Linn
KCKK	FM	88.3	NC	Jazz	Cedar Rapids, IA	07/02/2003	214	Kirkwood Community College	Cedar Rapids, IA	Linn
KRNL	FM	89.7	NC	AOR	Cedar Rapids, IA	07/02/2003	214	Cornell College	Mount Vernon, IA	Linn
KWOF	FM	89.1	NC	ChrsContem	Cedar Rapids, IA	07/02/2003	214	Friendship Communications	Hiawatha, IA	Linn

Number of Stations in Geographic Market 14

Previous Stations in Geographic Market

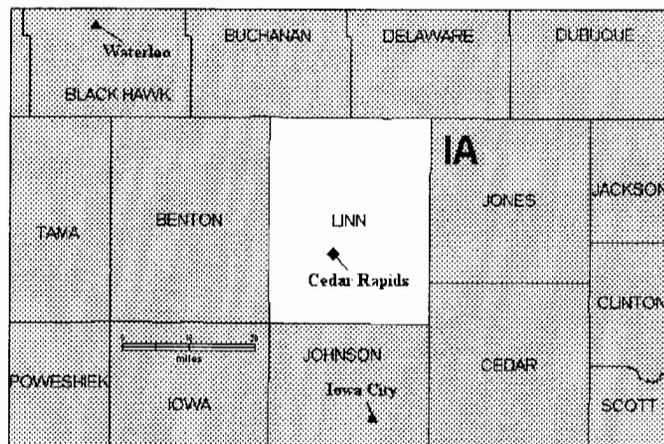
"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

Metro Rank: 214

Revenue Rank: 151

# Cedar Rapids, IA Market Overview



**Metro Counties / Population (000)**

Linn, IA	198.0
	198.0

**Market Radio Financials**

(all figures in 000's, except percentages and ratios)

ESTIMATED GROSS REVENUES ★★	2000	2001	2002	2003	2004	2005	Δ 00 - 05
		\$15,500	\$13,400	\$13,700	\$12,600	\$13,000	\$13,300
	Δ 04 - 05	2006	2007	2008	2009	2010	Δ 05 - 10
	2.3%	\$13,600	\$14,000	\$14,500	\$14,800	\$15,300	2.9%

	2000	2005	2010	Est. Breakout	
Revenue/Retail Sales	\$5.81/1,000	\$4.05/1,000	\$4.18/1,000	Local	82%
Revenue/Capita	\$83.33	\$67.17	\$74.78	National	18%

**Demographic and Economic Overview**

(000's, except Retail Sales and EBI in 000,000's)

	2000	2005	Growth Rate	2005	2010	Growth Rate
	MSA Population	186.0	198.0	1.3%	198.0	204.6
Households	73.5	80.1	1.7%	80.1	83.4	0.8%
Retail Sales	2,668.6	3,281.0	4.2%	3,281.0	3,660.6	2.2%
EBI	3,544.4	3,878.5	1.8%	3,878.5	4,379.2	2.5%

**Demographic Breakdown**

	Total	Under 12	12 - 17	18 - 24	25 - 34	35 - 44	45 - 54	Over 55
Men (000)	97.2	16.8	7.9	9.9	13.3	14.8	14.3	20.3
Women (000)	100.8	15.9	7.6	10.0	13.2	14.6	14.6	24.9
Total	198.0	32.6	15.5	19.9	26.5	29.4	28.8	45.2
Percentage	100.0%	16.5%	7.8%	10.0%	13.4%	14.8%	14.6%	22.8%
Per Capita	\$ 19,592							
				Median Household	\$ 40,210		Avg Household	\$ 48,417
Ethnic Population:	White 92.9%		Black 2.8%		Asian 1.7%		Hispanic 1.5%	

**Market Summary**

FM Classes	Class A	Class B	Class C	Viable FMs	All FMs	All AMs	Total
# Stations			8	8	8	5	13
Tot 12+			57.9	57.9	57.9	19.5	77.4
Avg 12+			7.2	7.2	7.2	3.9	6.0
Tot LCS			74.8	74.8	74.8	25.2	100.0
Avg LCS			9.4	9.4	9.4	5.0	7.7