

Exhibit 5 – Compliance with Local Radio Ownership Rule

Citadel Broadcasting Company (“Citadel”) is the owner of the following stations relevant to this application:

Call Sign	Facility ID	Community of License	County of License
KATT-FM	8797	Oklahoma City, OK	Oklahoma County
WWLS-FM	37435	Edmund, OK	Oklahoma County
WWLS(AM)	22190	Moore, OK	Cleveland County
KYIS(FM)	8798	Oklahoma City, OK	Oklahoma County
WKY(AM)	23418	Oklahoma City, OK	Oklahoma County

In addition, pursuant to a Local Marketing Agreement, Citadel provides greater than 15% of the programming for Station KQOB(FM), Enid, Oklahoma (Facility ID No. 10857). Enid, Oklahoma is located in Garfield County.

Oklahoma County and Cleveland County are part of the Oklahoma City, Oklahoma Metro, as defined by Arbitron. Garfield County is not part of the Oklahoma City Metro, but KQOB(FM) is reported as being “home” to that metro. Therefore, for KQOB(FM), the local radio ownership showing is provided using both the Arbitron market methodology and the interim contour-overlap methodology.

The attached FCC Geographic Market Definition for Oklahoma City, OK was compiled on July 23, 2007 using BIA Research, Inc.’s *Media Access Pro* database. The exhibit lists all radio stations, including the stations addressed herein, that are licensed to communities within the counties comprising the Oklahoma City, Oklahoma Metro or that Arbitron designates as “home” to that Metro. As demonstrated in the exhibit, there are 41 operating stations in the Oklahoma City, Oklahoma Metro, as so defined.¹ Under the local radio ownership rule, 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 not more than 7 commercial radio stations (not more than 4 of which are in the same service (AM or FM)).

Citadel’s attributable ownership interest in 4 FM and 2 AM stations fully complies with the local radio ownership rule using the Arbitron market methodology.

¹ Note that the FCC Geographic Market Definition for Oklahoma City, OK shows 46 licensed, full-power commercial and non-commercial radio stations in the Oklahoma City Metro. However, several stations have been added to the market as a result of the geographic expansion of the market effective August 12, 2005, September 12, 2005 or June 15, 2006. Those stations are not counted for purposes of this local radio ownership analysis.

As shown on the attached contour overlap analysis prepared by du Treil, Lundin & Rackley, Inc., Citadel's attributable ownership interest in KQOB(FM) also complies with the local radio ownership rule using the contour-overlap methodology.



FCC Geographic Market Definition for Oklahoma City, OK

Call Letters	AM/FM	Type	Freq	Station	Format	Home Market	Market			City & State of License	County of License
							Designn	Home Mkt	Owner		
							Date	Rank			
KRXO	FM	107.7	C	Cisc Rock	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Renda Broadcasting Corporation	Oklahoma City, OK	Oklahoma
KRMP	AM	1140	C	Urban AC	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Perry Broadcasting Company Inc	Oklahoma City, OK	Oklahoma
KATT	FM	100.5	C	AOR	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Citadel Communications	Oklahoma City, OK	Oklahoma
KOJK	FM	97.3	C	Jack	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Tyler Media Corporation	Blanchard, OK	McClain
KEBC	AM	1340	C	Sports	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	p Clear Channel	Midwest City, OK	Oklahoma
KHBZ	FM	94.7	C	Rock	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	p Clear Channel	Oklahoma City, OK	Oklahoma
KGFF	AM	1450	C	Adlt Stndrd	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Citizen Potawatomi National Inc	Shawnee, OK	Pottawatomie
KGOU	FM	106.3	NC	Nws/Tlk/Jaz	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	University of Oklahoma	Norman, OK	Cleveland
WWLS	FM	97.9	C	Sports	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Citadel Communications	Edmond, OK	Oklahoma
KJOY	FM	102.7	C	Top 40	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	p Clear Channel	Oklahoma City, OK	Oklahoma
KWCO	FM	105.5	C	Cisc Hits	Oklahoma City, OK	Oklahoma City, OK	06/15/2006	48	Kenny Communications Inc	Chickasha, OK	Grady
KKWD	FM	104.9	C	CHR/Rhymc	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	The Last Bastion Station Trust LLC	Bethany, OK	Oklahoma
KOMA	FM	92.5	C	Oldies	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Renda Broadcasting Corporation	Oklahoma City, OK	Oklahoma
KTST	FM	101.9	C	Country	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	p Clear Channel	Oklahoma City, OK	Oklahoma
WWLS	AM	640	C	Sports	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Citadel Communications	Moore, OK	Cleveland
KMGL	FM	104.1	C	AC	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Renda Broadcasting Corporation	Oklahoma City, OK	Oklahoma
KMFS	AM	1490	C	Gospel	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Family Worship Center Church Inc	Guthrie, OK	Logan
KOKC	AM	1520	C	News/Talk	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Renda Broadcasting Corporation	Oklahoma City, OK	Oklahoma
KQCV	AM	800	C	Relgm/Talk	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Bott Radio Network	Oklahoma City, OK	Oklahoma
KVSP	FM	103.5	C	Urban	Oklahoma City, OK	Oklahoma City, OK	11/04/2004	48	Perry Broadcasting Company Inc	Anadarko, OK	Caddo
KIRC	FM	105.9	C	Country	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	One Ten Broadcast Group	Seminole, OK	Seminole
KKNG	FM	93.3	C	Country	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Tyler Media Corporation	Newcastle, OK	McClain
KTOK	AM	1000	C	News/Talk	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	p Clear Channel	Oklahoma City, OK	Oklahoma
KOCY	AM	1560	C	Children	Oklahoma City, OK	Oklahoma City, OK	08/09/2003	48	Tyler Media Corporation	Del City, OK	Oklahoma
KWSH	AM	1260	C	Cty/Sp/Tlk	Oklahoma City, OK	Oklahoma City, OK	06/15/2006	48	One Ten Broadcast Group	Wewoka, OK	Seminole
KTUZ	FM	106.7	C	Mexican	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Tyler Media Corporation	Okarche, OK	Canadian
KXXY	FM	96.1	C	Country	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	p Clear Channel	Oklahoma City, OK	Oklahoma
KYIS	FM	98.9	C	Modern AC	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Citadel Communications	Oklahoma City, OK	Oklahoma
KZUE	AM	1460	C	Span/Varty	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	La Tremenda Radio Mexico, Inc.	El Reno, OK	Canadian
WKY	AM	930	C	Sports	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Citadel Communications	Oklahoma City, OK	Oklahoma
KREF	AM	1400	C	Sports	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	Fox Broadcasting Company Inc	Norman, OK	Cleveland
KTLV	AM	1220	C	Black Gospl	Oklahoma City, OK	Oklahoma City, OK	07/02/2003	48	First Choice Broadcasting	Midwest City, OK	Oklahoma

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

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Oklahoma City, OK

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market		City & State of License	County of License
							Designtrn	Home Mkt Rank		
							Date	Owner		
KTLR	AM	890	C	Talk		Oklahoma City, OK	07/02/2003	48	Tyler Media Corporation	Oklahoma City, OK
KQOB	FM	96.9	C	Cisc Hits		Oklahoma City, OK	07/02/2003	48	Chisholm Trail Broadcasting Co.	Enid, OK
KSLE	FM	104.7	C	Oldies		Oklahoma City, OK	06/15/2006	48	One Ten Broadcast Group	Wewoka, OK
KQCV	FM	95.1	C	Relgn/Talk		Oklahoma City, OK	07/02/2003	48	Bott Radio Network	Shawnee, OK
KINB	FM	105.3	C	Mexican		Oklahoma City, OK	07/02/2003	48	The Last Bastion Station Trust LLC	Kingfisher, OK
KALU	FM	89.3	NC	Urb/HHp/Jaz		Oklahoma City, OK	07/02/2003	48	Langston University	Langston, OK
KCSC	FM	90.1	NC	Classical		Oklahoma City, OK	07/02/2003	48	University of Central Oklahoma	Edmond, OK
KMSI	FM	88.1	NC	CCV/Cst/Tlk		Oklahoma City, OK	07/02/2003	48	Creative Educational Media Corp Inc	Moore, OK
KOKF	FM	90.9	NC	ChrsContem		Oklahoma City, OK	07/02/2003	48	Educational Media Foundation	Edmond, OK
KOSU	FM	91.7	NC	Cisc/NPR		Oklahoma City, OK	09/12/2005	48	Oklahoma State University	Stillwater, OK
KROU	FM	105.7	NC	Nws/Tlk/Jaz		Oklahoma City, OK	07/02/2003	48	University of Oklahoma	Spencer, OK
KYLV	FM	88.9	NC	ChrsContem		Oklahoma City, OK	07/02/2003	48	Educational Media Foundation	Oklahoma City, OK
KXTH	FM	89.1	NC	ChrsContem		Oklahoma City, OK	06/15/2006	48	Love Station Inc	Seminole, OK
KSSO	FM	89.3	NC	Religion		Oklahoma City, OK	08/12/2005	48	Family Worship Center Church Inc	Norman, OK

Number of Stations in Geographic Market 46

Previous Stations in Geographic Market

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

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