

Exhibit 19

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

By this exhibit, Mapleton License of Spokane, LLC (“Mapleton”) confirms that this transfer of control application complies with the FCC’s local radio ownership rules under the Arbitron Metro methodology.

BIA reports that there are thirty-eight full-power, commercial and non-commercial radio stations located within or “home” to the Spokane, Washington Metro Market. Under the Commission’s local radio ownership limits as set forth at 47 C.F.R. § 73.3555(a)(1)(iii), in a radio market with between thirty and forty-four (inclusive) full-power, commercial and noncommercial radio stations, a party may have a cognizable interest in up to seven full-power, commercial radio stations, of which four may be in the same service (AM or FM).

The parties to this application currently hold, and after consummation of the proposed transaction would continue to hold, attributable interests in the following seven stations, each of which is identified by BIA as “home” to the Spokane Metro Market and is licensed to a community located within the geographic boundaries of this market:

KGA(AM), Spokane, Washington (Facility ID No. 11234)
KZBD(FM), Spokane, Washington (Facility ID No. 11243)
KEYF(AM), Dishman, Washington (Facility ID No. 53148)
KJRB(AM), Spokane, Washington (Facility ID No. 11235)
KEYF-FM, Cheney, Washington (Facility ID No. 53147)
KDRK-FM, Spokane, Washington (Facility ID No. 11242)
KBBD(FM), Spokane, Washington (Facility ID No. 36488)

Because Mapleton owns no other radio stations in or near the Spokane radio market, after consummation of the transactions proposed herein, the parties to this application would hold cognizable interests in seven full-power commercial radio stations in this Metro Market, including four stations in the FM radio service. Consequently, grant of this application complies with the FCC’s local radio ownership rules under the Arbitron Metro Market methodology.