

FORM 318 APPLICATION FOR PERMIT TO CONSTRUCT LPFM STATION
EXHIBIT 10 – Established Community Presence of Applicant

Defining “Local” and “Established”. The proposed Community of License, as set forth at Section I, Item (3), is located *outside* of the top 50 urban markets.¹ Thus, for the purposes of this application, the applicant is “local” (its “Local Eligibility”) if its physical headquarters or campus is within **20 miles** of its transmitter site as contemplated in the instant application (the “Local Threshold”). Alternatively, Local Eligibility exists if at least 75 percent of members of the Board of Directors reside within this Local Threshold.

Support for Certification as a Local Applicant. The Applicant’s proposed transmitter site is set forth at Section VI (the “Transmitter Site”).

- Applicant supports its Section II, Item (4)(a) certification by noting that it maintains its physical headquarters/campus at the address specified at Section I, Item (1). This location is, with respect to the Transmitter Site, within the Local Threshold.

Support for Comparative Criteria Claim of “Established Community Presence”. Applicant has at all times maintained is nonprofit and educational nature as documented in Exhibit 2 of this Application. Thus, Applicant may claim an established local presence if this Local Eligibility has existed for at least two years prior to its application.

Applicant’s community presence began at least as early as the date set forth at Section IV, Item (1), a period of *less than two years* prior to the submission of this application. Accordingly, the Applicant is ineligible for the “established community presence” point system factor.

Duration of “Community Presence”. For the purposes of any tiebreaker analysis in the processing of mutually exclusive applications, Applicant may claim an “established” community presence for the duration in which its Local Eligibility existed continuously in the years prior to the submission of its application. In view of the foregoing, Applicant claims an established community presence since the date set forth at Section IV. Enclosed herewith, at Exhibit 2 (incorporated herein by this reference) and at this Exhibit 10, is documentation and archival evidence of the community presence of the Applicant.²

¹ See http://www.arbitron.com/downloads/Arb_US_Metro_Map_12.pdf.

² This evidence is not intended to be exhaustive but, rather, sufficient to illustrate the historic ties of the Applicant to the local community. Applicant is prepared to provide additional evidence of such ties upon the agency’s request.