

MULTIPLE AND CROSS OWNERSHIP

As a result of the grant of the instant application, the applicant will have common ownership of four radio stations: WHIZ(AM) and WHIZ-FM in the Zanesville market, WWCD(FM) in the Columbus, Ohio market, and WZVL(FM) in Philo, OH. The licensee and the parties to the applicant also own WHIZ-TV in the Zanesville market. As shown below, this common ownership complies with 47 C.F.R. 73.3555(a) (Local Ownership Rule) and Section 73.3555(c)(Television/Radio Cross-Ownership Rule).

Local Radio Ownership Rule

WZVL(FM) is licensed to Philo, OH which is not located in a Metro County in any Arbitron Rated market. WHIZ(AM) and WHIZ-FM are not licensed to communities within an Arbitron Metro and are not home to an Arbitron Metro. The community of license of WWCD(FM) is Baltimore, Ohio, which is in the Columbus, Ohio Arbitron Metro. A construction permit for WZVL(FM) was granted on February 12, 2010. A complete multiple ownership exhibit was included in the application (BNPH-20091015AAE). Exhibit #3 to that application was a tabulation of the stations in the Radio market. It shows that the number of stations falls in the 15-29 stations tier of 73.3555(a)(1)(iii) of the rules and that the common ownership of the four radio stations complies with the Commission's Local Ownership Rule. An updated list of stations is attached. The instant transfer involves a transfer of control of the four radio stations from the controlling stockholder to her son.

Television /Radio Cross-Ownership Rule

The ownership of the stations involved here is permissible provided that there are at least 10 independently owned media voices in the market. The Commission considers broadcast stations, daily newspapers, and cable in determining the number of independently owned media voices in the market. As shown below, proposed transfer of control complies with the rule.

WHIZ-TV is the only TV station in the Zanesville, Ohio DMA which consists of one county, Muskingum County. The relevant contour of WHIZ-TV encompasses the community of license of WHIZ(AM) and WHIZ-FM and the Philo FM station. The three radio stations are licensed to Muskingum County communities which are outside of all Arbitron Metros. Section 73.3555(c)(3)(iii)© of the Rules states that in areas where there is no radio metro market the stations are counted in what would be the "functional equivalent" of a radio market. For assessing compliance here, the "functional equivalent" market is Muskingum County, Ohio or the Zanesville, Ohio DMA.

Attached hereto is a list of the radio stations with reportable shares in Muskingum County, Ohio, based on Arbitron data. It shows that there are more than 16 independently-owned radio voices in the market, and, in addition, the market is served by the daily newspaper, the Zanesville Times Recorder, and by Time Warner Cable. Thus, the number of independently-owned media voices complies with the Commission's Television/Radio Cross Ownership Rule.

Radio Stations with Reportable Shares in Muskingum County

<u>Call Sign</u>	<u>Community of License</u>	<u>County of License</u>	<u>Licensee</u>	<u>Owner</u>
WBNS-FM	Columbus, OH	Franklin County	Radiohio, Incorporated	Radiohio, Incorporated (1)
WRKZ(FM)	Columbus, OH	Franklin County	North American Broadcasting Company, Inc.	North American Broadcasting Company, Inc. (2)
WCOL-FM	Columbus, OH	Franklin County	Citicasters Licenses, LP	Clear Channel Communications, Inc. (3)
WLVQ(FM)	Columbus, OH	Franklin County	Wilks License Company-Columbus, LLC	Wilks Broadcast Group LLC (4)
WNCI(FM)	Columbus, OH	Franklin County	Citicasters Licenses, LP	Clear Channel Communications Inc.
WTVN(AM)	Columbus, OH	Franklin County	Citicasters Licenses, LP	Clear Channel Communications, Inc.
WCLT-FM	Newark, OH	Licking County	WCLT Radio, Inc.	WCLT Radio, Inc. (5)
WHOK-FM	Lancaster, OH	Fairfield County	Wilks License Company - Columbus, LLC	Wilks Broadcast Group, LLC
WJZA(FM)	Pickerington, OH	Fairfield County	Franklin Communications, Inc.	Saga Communications, Inc. (6)
WQIO(FM)	Mount Vernon, OH	Knox County	BAS Broadcasting, Inc	BAS Broadcasting, Inc. (7)
WRVB(FM)	Marietta, OH	Washington County	CC Licenses, LLC	Clear Channel Communications, Inc.
WBIK(FM)	Pleasant City, OH	Guernsey County	David L. Wilson	David L. Wilson (8)
WILE-FM	Byesville, OH	Guernsey County	AVC Communications, Inc.	W. Grant Hafley (9)

WCMJ(FM)	Cambridge, OH	Guernsey County	AVC Communications, Inc	W. Grant Hafley
WHIZ(AM)	Zanesville, OH	Muskingum County	Southeastern Ohio Broadcasting System, Inc.	Southeastern Ohio Broadcasting System, Inc. (10)
WHIZ-FM	S. Zanesville, OH	Muskingum County	Southeastern Ohio Broadcasting System, Inc.	Southeastern Ohio Broadcasting System, Inc.
WWJM(FM)	New Lexington, OH	Perry County	Perry County Broadcasting Co., Inc.	Perry County Broadcasting Co, Inc. (11)
WYBZ(FM)	Crooksville, OH	Perry County	Y. Bridge Broadcasting, Inc.	Y. Bridge Broadcasting, Inc. (12)
WBGI-FM	Bellaire, OH	Belmont County	Keymarket Licenses, LLC	Keymarket Licenses, LLC (13)
WWKC(FM)	Caldwell, OH	Noble County	W. Grant Hafley	W. Grant Hafley
WXIL(FM)	Elizabeth, WV	Wirt County	Burback of DE, LLC	Burback of DE, LLC (14)
WEGW(FM)	Wheeling WV	Ohio County	Capstar TX Limited Partnership	Clear Channel Communications, Inc.
WCKX(FM)	Columbus, OH	Franklin County	Blue Chip Broadcast License, LTD	Blue Chip Broadcast Licenses, LTD (15)
WSNY(FM)	Columbus, OH	Franklin County	Franklin Communications, Inc.	Franklin Communications, Inc. (16)

Total Number of Independent Station Owners - 16

Note: In addition to the foregoing, there are the following NCE Stations in Columbus, OH

WUFM(FM), Spirit Communications, Inc;
WOSU-FM, Ohio State University; and
WHKC(FM), Christian Broadcast Services, Inc.