

Multiple Ownership Analysis

CBS Radio Holdings Inc. ("CBS") proposes to acquire radio stations KHMJ(FM), Fac. ID No. 47749, Houston, Texas, currently licensed to Citicasters Licenses, L.P., and KLOL(FM), Fac. ID No. 35073, Houston, Texas, currently licensed to AMFM Texas Licenses Limited Partnership, (collectively, the "Stations"). As the Stations' licenses are currently held by two different proposed Assignors, this application and a companion application have been simultaneously filed.

The acquisition of the Stations implicates the Commission's local radio multiple ownership rule. As demonstrated below CBS's acquisition of the Stations will fully comply with that rule.

The Commission's local radio multiple ownership rule provides that in markets with more than 45 (inclusive) full-power, commercial and noncommercial radio stations, one party may have a cognizable interest in licenses for not more than eight commercial radio stations, no more than five of which are in the same service (AM or FM). 47 C.F.R. § 73.3555(a)(1)(i). The Commission defines the relevant market to be the "Arbitron Metro," in those markets so designated by Arbitron. *See 2002 Biennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, 18 FCC Rcd 13620, 13712-13 (2003).

For purposes of the local radio ownership rule, both Stations are deemed to be included in the Houston-Galveston, Texas Arbitron Metro (the "Metro"). According to BIA Research, Inc.'s *Media Access Pro* database as of December 2, 2008 (*see the attached FCC Geographic Market Definition Report for the Houston-Galveston, TX Metro*), there are 73 full-power, commercial and noncommercial radio stations licensed to communities within the Metro or which Arbitron designates as "home" to the Metro. Accordingly, the current local radio ownership rule permits CBS to have a cognizable interest in up to eight commercial radio stations (with five in the same service) in the Houston-Galveston, Texas Metro. As shown on the attached *FCC Geographic Market Definition Report for the Houston-Galveston, TX Metro*, CBS currently has a cognizable interest in four commercial radio stations in the Metro.

Call Sign	Facility ID	City of License
KIKK(AM)	25450	Pasadena, TX
KKHH(FM)	25449	Houston, TX
KILT(AM)	25440	Houston, TX
KILT(FM)	25439	Houston, TX

Assignees' Exhibit 15
FCC Form 314
Section III, Item 6(b)
December 2008

Following consummation of the proposed assignment, CBS will have a cognizable interest in six commercial radio stations (2 AM stations and 4 FM stations).

For the reasons set forth herein, a grant of this application is fully consistent with the Commission's local radio ownership rule.



FCC Geographic Market Definition for Houston-Galveston, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KNUZ	AM	1090	C	Soft AC	Houston-Galveston, TX	07/02/2003	6	Henderson, Roy E	Bellville, TX	Austin
KHJK	FM	103.7	C	Adult Hits	Houston-Galveston, TX	07/02/2003	6	Cumulus Media Partners LLC	La Porte, TX	Harris
KBRZ	AM	1460	C	Span/CCtmp	Houston-Galveston, TX	07/02/2003	6	Aleluya Christian Broadcasting	Missouri, TX	Fort Bend
KWWJ	AM	1360	C	Gospl/Chrst	Houston-Galveston, TX	07/02/2003	6	Salt of the Earth Broadcasting Inc	Baytown, TX	Harris
KCOH	AM	1430	C	Urban	Houston-Galveston, TX	07/02/2003	6	KCOH Inc	Houston, TX	Harris
KETX	AM	1440	C	Country	Houston-Galveston, TX	07/02/2003	6	Telcom Supply Inc	Livingston, TX	Polk
KETX	FM	92.3	C	Country	Houston-Galveston, TX	07/02/2003	6	Telcom Supply Inc	Livingston, TX	Polk
KEYH	AM	850	C	Mexican	Houston-Galveston, TX	07/02/2003	6	Lieberman Broadcasting Inc	Houston, TX	Harris
KBXX	FM	97.9	C	R&BOd/HpH	Houston-Galveston, TX	07/02/2003	6	Radio One Inc	Houston, TX	Harris
KRTX	AM	980	C	Tejano	Houston-Galveston, TX	07/02/2003	6	p Aleluya Christian Broadcasting	Rosenburg/Richmond, TX	Fort Bend
KPTY	FM	93.3	C	Rhymc/CHR	Houston-Galveston, TX	07/02/2003	6	Univision	Port Arthur, TX	Jefferson
KGBC	AM	1540	C	Religion	Houston-Galveston, TX	07/02/2003	6	SIGA Broadcasting Corporation	Galveston, TX	Galveston
KTBZ	FM	94.5	C	Modern	Houston-Galveston, TX	07/02/2003	6	Clear Channel Communications Inc	Houston, TX	Harris
KGOW	AM	1560	C	Sprts/Talk	Houston-Galveston, TX	07/02/2003	6	Gow Communications LLC	Bellaire, TX	Harris
KHCB	FM	105.7	NC	Christian	Houston-Galveston, TX	07/02/2003	6	Houston Christian Broadcasters Inc	Houston, TX	Harris
KTJM	FM	98.5	C	Mexican	Houston-Galveston, TX	07/02/2003	6	Lieberman Broadcasting Inc	Port Arthur, TX	Jefferson
KIKK	AM	650	C	Bus News	Houston-Galveston, TX	07/02/2003	6	CBS Radio	Pasadena, TX	Harris
KKHH	FM	95.7	C	CHR	Houston-Galveston, TX	07/02/2003	6	CBS Radio	Houston, TX	Harris
KJOJ	AM	880	C	Nrtno/Tejno	Houston-Galveston, TX	07/02/2003	6	Lieberman Broadcasting Inc	Conroe, TX	Montgomery
KHCB	AM	1400	NC	Span/Chrst	Houston-Galveston, TX	07/02/2003	6	Houston Christian Broadcasters Inc	Galveston, TX	Galveston
KILT	AM	610	C	Sports	Houston-Galveston, TX	07/02/2003	6	CBS Radio	Houston, TX	Harris
KJOJ	FM	103.3	C	Mexican	Houston-Galveston, TX	07/02/2003	6	Lieberman Broadcasting Inc	Freeport, TX	Brazoria
KBME	AM	790	C	Sports	Houston-Galveston, TX	07/02/2003	6	Clear Channel Communications Inc	Houston, TX	Harris
KKBQ	FM	92.9	C	Country	Houston-Galveston, TX	07/02/2003	6	Cox Radio Inc	Pasadena, TX	Harris
KLAT	AM	1010	C	Spn/Nws/Tlk	Houston-Galveston, TX	07/02/2003	6	Univision	Houston, TX	Harris
KHTC	FM	107.5	C	Clsc Hits	Houston-Galveston, TX	07/02/2003	6	Cox Radio Inc	Lake Jackson, TX	Brazoria
KLOL	FM	101.1	C	Reggaeton	Houston-Galveston, TX	07/02/2003	6	Clear Channel Communications Inc	Houston, TX	Harris
KKRW	FM	93.7	C	Clsc Rock	Houston-Galveston, TX	07/02/2003	6	Clear Channel Communications Inc	Houston, TX	Harris
KLVL	AM	1480	C	Span/Varty	Houston-Galveston, TX	07/02/2003	6	SIGA Broadcasting Corporation	Pasadena, TX	Harris
KMJQ	FM	102.1	C	Urban	Houston-Galveston, TX	07/02/2003	6	Radio One Inc	Houston, TX	Harris
KYOK	AM	1140	C	Gospl/CCtm	Houston-Galveston, TX	07/02/2003	6	Martin Broadcasting Inc	Conroe, TX	Montgomery
KQUE	AM	1230	C	Nrtno/Tejno	Houston-Galveston, TX	07/02/2003	6	Lieberman Broadcasting Inc	Houston, TX	Harris
KODA	FM	99.1	C	Christmas	Houston-Galveston, TX	08/22/2003	6	Clear Channel Communications Inc	Houston, TX	Harris
KPRC	AM	950	C	Talk	Houston-Galveston, TX	07/02/2003	6	Clear Channel Communications Inc	Houston, TX	Harris

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

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Houston-Galveston, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KCHN	AM	1050	C	Ethnic	Houston-Galveston, TX	07/02/2003	6	MultiCultural Radio Broadcasting Inc	Brookshire, TX	Waller
KLTN	FM	102.9	C	Mexican	Houston-Galveston, TX	07/02/2003	6	Univision	Houston, TX	Harris
KKHT	FM	100.7	C	Chrst/Talk	Houston-Galveston, TX	07/02/2003	6	Salem Communications Corporation	Winnie, TX	Chambers
KRBE	FM	104.1	C	CHR	Houston-Galveston, TX	07/02/2003	6	Cumulus Media Partners LLC	Houston, TX	Harris
KHMX	FM	96.5	C	Hot AC	Houston-Galveston, TX	07/02/2003	6	Clear Channel Communications Inc	Houston, TX	Harris
KTEK	AM	1110	C	Bus News	Houston-Galveston, TX	07/02/2003	6	BusinessRadio Inc	Alvin, TX	Brazoria
KTRH	AM	740	C	Nws/Tlk/Spt	Houston-Galveston, TX	07/02/2003	6	Clear Channel Communications Inc	Houston, TX	Harris
KGOL	AM	1180	C	Internat'l	Houston-Galveston, TX	07/02/2003	6	Entravision Communications Corp	Humble, TX	Harris
KAMA	FM	104.9	C	Span/AdHts	Houston-Galveston, TX	10/23/2003	6	Univision	Deer Park, TX	Harris
KILT	FM	100.3	C	Country	Houston-Galveston, TX	07/02/2003	6	CBS Radio	Houston, TX	Harris
KQQK	FM	107.9	C	Span/Pop	Houston-Galveston, TX	07/02/2003	6	Lieberman Broadcasting Inc	Beaumont, TX	Jefferson
KXYZ	AM	1320	C	Internat'l	Houston-Galveston, TX	07/02/2003	6	MultiCultural Radio Broadcasting Inc	Houston, TX	Harris
KOVE	FM	106.5	C	Spn/Var/AHt	Houston-Galveston, TX	07/02/2003	6	Univision	Galveston, TX	Galveston
KMIC	AM	1590	C	Famly/Top4	Houston-Galveston, TX	07/02/2003	6	ABC/Disney	Houston, TX	Harris
KYST	AM	920	C	Spn/Nws/Tlk	Houston-Galveston, TX	07/02/2003	6	Hispanic Broadcasting Inc	Texas City, TX	Galveston
KROI	FM	92.1	C	Gospel	Houston-Galveston, TX	07/02/2003	6	Radio One Inc	Seabrook, TX	Harris
KNTH	AM	1070	C	Nws/Tlk/Inf	Houston-Galveston, TX	07/02/2003	6	Salem Communications Corporation	Houston, TX	Harris
KSEV	AM	700	C	Talk	Houston-Galveston, TX	07/02/2003	6	Lieberman Broadcasting Inc	Tomball, TX	Harris
KHPT	FM	106.9	C	80s Hits	Houston-Galveston, TX	07/02/2003	6	Cox Radio Inc	Conroe, TX	Montgomery
KPTI	FM	105.3	C	Rhymc/CHR	Houston-Galveston, TX	07/02/2003	6	Univision	Crystal Beach, TX	Galveston
KSHN	FM	99.9	C	AC/Old/Cty	Houston-Galveston, TX	07/02/2003	6	Trinity River Valley Broacasting Company	Liberty, TX	Liberty
KFNC	FM	97.5	C	Sports	Houston-Galveston, TX	07/02/2003	6	Cumulus Media Partners LLC	Beaumont, TX	Jefferson
KYND	AM	1520	C	Ethnic	Houston-Galveston, TX	07/02/2003	6	Provenzano, Matthew	Cypress, TX	Harris
KTHT	FM	97.1	C	Country	Houston-Galveston, TX	07/02/2003	6	Cox Radio Inc	Cleveland, TX	Liberty
KSTB	FM	101.5	C	Country	Houston-Galveston, TX	07/02/2003	6	Cumulus Broadcasting Inc	Crystal Beach, TX	Galveston
KVST	FM	99.7	C	Country	Houston-Galveston, TX	07/02/2003	6	New Wavo Communications Group	Willis, TX	Montgomery
KNRG	FM	92.3	C	Clsc Hits	Houston-Galveston, TX	07/02/2003	6	Henderson, Roy E	New Ulm, TX	Austin
KACC	FM	89.7	NC	AOR	Houston-Galveston, TX	07/02/2003	6	Alvin Community College	Alvin, TX	Brazoria
KAFR	FM	88.3	NC	CCtmp/Inspr	Houston-Galveston, TX	07/02/2003	6	American Family Association Incorporated	Conroe, TX	Montgomery
KFTG	FM	88.1	NC	Span/CCtmp	Houston-Galveston, TX	07/02/2003	6	Aleluya Christian Broadcasting	Pasadena, TX	Harris
KJIC	FM	90.5	NC	Gospel	Houston-Galveston, TX	07/02/2003	6	Community Radio Inc	Santa Fe, TX	Galveston
KPFT	FM	90.1	NC	Ecrtc/PubSv	Houston-Galveston, TX	07/02/2003	6	Pacifica Foundation	Houston, TX	Harris
KPVU	FM	91.3	NC	NPR/SJz/Gs	Houston-Galveston, TX	07/02/2003	6	Prairie View A&M University	Prairie View, TX	Waller
KSBJ	FM	89.3	NC	Christmas	Houston-Galveston, TX	07/02/2003	6	KSBJ Educational Foundation	Humble, TX	Harris

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Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KTRU	FM	91.7	NC	Variety	Houston-Galveston, TX	07/02/2003	6	Rice University	Houston, TX	Harris
KTSU	FM	90.9	NC	Jaz/Old/BGs	Houston-Galveston, TX	07/02/2003	6	Texas Southern University	Houston, TX	Harris
KUHF	FM	88.7	NC	NPR/Clscl	Houston-Galveston, TX	07/02/2003	6	University of Houston	Houston, TX	Harris
KYBJ	FM	91.1	NC	ChrsContem	Houston-Galveston, TX	07/02/2003	6	KSBJ Educational Foundation	Lake Jackson, TX	Brazoria
KTWL	FM	105.3	C	Soft AC	Houston-Galveston, TX	11/07/2003	6	Henderson, Roy E	Hempstead, TX	Waller

Number of Stations in Geographic Market 73

Previous Stations in Geographic Market

KNTE	FM	96.9	C	Nrtno/Tejno		05/11/2006	0	Liberman Broadcasting Inc	El Campo, TX	Wharton
KXGJ	FM	101.7	C	Span/Pop		05/11/2006	0	Liberman Broadcasting Inc	Bay City, TX	Matagorda