

Exhibit 5 - Multiple Ownership Compliance Showing

Ramar Communications, Inc. (“Ramar”) was the winning bidder in Auction 88 for a new FM station at Idalou, Texas. On October 6, 2010 the Commission granted Ramar’s Form 301 application for a construction permit for that Idalou station (BPH-19971016MJ). The station to be built now has the call sign KLBB-FM, and Ramar here seeks to modify the KLBB-FM facilities. This exhibit essentially repeats the showing previously approved by the Commission and demonstrates that the common ownership of this new FM station and the following stations already licensed to Ramar continues to comply with both the local radio ownership rule and the radio-television cross ownership rule.

Ramar is the licensee of the following stations relevant to this analysis:

Call Sign	Community of License	Facility ID
KTTU-FM	Brownfield, Texas	61581
KJTV(AM)	Lubbock, Texas	55061
KXTQ-FM	Lubbock, Texas	55062
KLZK(FM)	New Deal, Texas	54684
KJTV-TV	Lubbock, Texas	55031

Compliance with the Local Radio Ownership Rule

KLBB-FM is authorized to serve Idalou, Texas. Idalou is located in Lubbock County. Therefore, for purposes of the local radio ownership rule, the new FM station is deemed to be a part of the Lubbock, Texas Arbitron Metro. Attachment A hereto was

compiled on January 27, 2012 using BIA Research, Inc.'s *Media Access Pro* database.

Attachment A lists all radio stations that are licensed to communities within Lubbock County, the county that comprises the Lubbock, Texas Metro, or that Arbitron designates as "home" to that Metro. As demonstrated in Attachment A, there are 27 stations in the Lubbock, Texas Metro, as so defined. Under the local radio ownership rule, a person or single entity (or entities under common control) in a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations may have a cognizable interest in up to 6 commercial radio stations (not more than 4 of which are in the same service (AM or FM)).

As shown in Attachment A , Ramar currently controls 4 licensed radio stations that are either located in or considered home to the Lubbock, Texas Metro (1 AM and 3 FM). The addition of KLBB-FM results in Ramar controlling 5 radio stations (1 AM and 4 FM) within the Lubbock, Texas Metro, which fully complies with the local radio ownership rule.

Brownfield, Texas, the community of license Ramar's KTTU-FM, is located in Terry County, which is not included in any radio Metro market, as defined by Arbitron. However, KTTU-FM is considered "home" to the Lubbock, Texas Metro. Accordingly, a showing of compliance using the interim contour-overlap methodology also is provided in Attachment B hereto. That showing indicates that the contours of 37 radio stations overlap the radio market defined by the overlapping contours of the five radio stations owned by Ramar. 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 up to 7 commercial radio stations (not more than 4 of which are in the same service (AM or FM)). Ramar's ownership of the 1 AM and 4 FM stations identified herein fully complies with the local radio ownership rule as determined by the interim contour-overlap methodology as well.

Compliance with the Radio-Television Cross Ownership Rule

The common ownership of KJTV-TV and KLBB-FM implicates the radio-television cross ownership rule as currently applied by the Commission.

The radio-television cross ownership rule is triggered when either (i) the Grade A contour of a television station encompasses the community of license of a commonly owned radio station, or (ii) when the 1 mV/m contour of an FM station or the 2 mV/m contour of an AM station encompasses the community of license of a commonly owned television station. Once the radio-television cross ownership rule has been triggered, the number of independently owned and operated television stations in a market is determined on the basis of Grade B contour overlap. However, because digital television stations no longer have analog Grade A or Grade B contours by which to determine compliance with the radio-television cross ownership rule and the FCC has not yet modified that rule to specify contours that are applicable to DTV service, the Media Bureau has applied a methodology based on the digital noise limited service contour ("NLSC") to assess compliance. *Application for Transfer of Control of Nassau Broadcasting II, L.L.C.*, 25 FCC Rcd 1851 (2010).

As demonstrated on the contour overlap study included in Attachment B, the NLSC (41 dBu) for KJTV-TV encompasses the entire community of Idalou, Texas, and

the 1 mV/m (60 dBu) contour of the new FM at Idalou encompasses all of Lubbock, Texas, the community of license of KJTV-TV.

Although the radio-television cross ownership rule is triggered by contour encompassment, the Commission determines compliance with the rule on an Arbitron Metro basis.

Under the radio-television cross ownership rule, an entity may control up to one commercial television station and seven commercial radio stations in an Arbitron Metro market if at least 20 independently owned and operated media voices would remain in the market post-acquisition. *See* 47 C.F.R. § 73.3555(c)(2)(i) (2002). As the charts provided in Attachment C hereto (compiled on January 26, 2012) indicate, there will be at least 20 independently owned and operated media voices in the Lubbock, Texas Metro following the grant of the instant application. Specifically, there will be at least 13 independent radio voices, five independent television voices,<sup>1</sup> one independent newspaper voice and one independent cable system voice. As a result, Ramar's attributable interest in KJTV-TV, its four existing commercial radio stations (KTTU-FM, KJTV(AM), KXTQ-FM and KLZK(FM)) and KLBB-FM fully complies with the radio-television cross ownership rule. In granting BPH-19971016MJ, the Commission approved a showing that was identical in all material respects to the radio-television cross-ownership compliance showing set forth above.

---

<sup>1</sup> Attachment B contains a map depicting the NLSC of the television stations in the Lubbock, Texas DMA that overlap the NLSC of KJTV-TV.

# FCC Geographic Market Definition for Lubbock, 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
KAIQ	FM	95.5	C	Mexican	Lubbock, TX	08/01/2003	179	Entravision Communications Corp	Wolfforth, TX	Lubbock
KAMY	FM	90.1	NC	Inspr/Chrst	Lubbock, TX	07/02/2003	179	Family Life Communications Inc	Lubbock, TX	Lubbock
KAMZ	FM	103.5	C	Mexican	Lubbock, TX	07/02/2003	179	Benavides, Albert	Tahoka, TX	Lynn
KBTE	FM	104.9	C	Urban CHR	Lubbock, TX	02/09/2004	179	Wilks Broadcast Group LLC	Tulia, TX	Swisher
KBZO	AM	1460	C	Span/AdHts	Lubbock, TX	07/02/2003	179	Entravision Communications Corp	Lubbock, TX	Lubbock
KDAV	AM	1590	C	Oldies	Lubbock, TX	07/02/2003	179	Renaissance Broadcasting	Lubbock, TX	Lubbock
KEJS	FM	106.5	C	Tejano	Lubbock, TX	07/02/2003	179	Barton Broadcasting Co	Lubbock, TX	Lubbock
KFMX	FM	94.5	C	Rock	Lubbock, TX	07/02/2003	179	Townsquare Media LLC	Lubbock, TX	Lubbock
KFYO	AM	790	C	Nws/Tlk/Spt	Lubbock, TX	07/02/2003	179	Townsquare Media LLC	Lubbock, TX	Lubbock
KJAK	FM	92.7	C	Chrst/Talk	Lubbock, TX	07/02/2003	179	Williams Broadcasting Group	Slaton, TX	Lubbock
KJDL	AM	1420	C	News/Talk	Lubbock, TX	07/02/2003	179	Walker Broadcasting & Communications Ltd	Lubbock, TX	Lubbock
KJTV	AM	950	C	News/Talk	Lubbock, TX	07/02/2003	179	Ramar Communications	Lubbock, TX	Lubbock
KKAM	AM	1340	C	Sprts/Talk	Lubbock, TX	07/02/2003	179	Townsquare Media LLC	Lubbock, TX	Lubbock
KKCL	FM	98.1	C	Oldies	Lubbock, TX	07/02/2003	179	Townsquare Media LLC	Lorenzo, TX	Crosby
KKLU	FM	90.9	NC	Chrst/Altve	Lubbock, TX	07/02/2003	179	Educational Media Foundation	Lubbock, TX	Lubbock
KLLL	FM	96.3	C	Country	Lubbock, TX	07/02/2003	179	Wilks Broadcast Group LLC	Lubbock, TX	Lubbock
KLZK	FM	97.3	C	HotAC/AC	Lubbock, TX	07/02/2003	179	Ramar Communications	New Deal, TX	Lubbock
KMMX	FM	100.3	C	AdHts/Top4	Lubbock, TX	07/02/2003	179	Wilks Broadcast Group LLC	Tahoka, TX	Lynn
KONE	FM	101.1	C	Clsc Rock	Lubbock, TX	07/02/2003	179	Wilks Broadcast Group LLC	Lubbock, TX	Lubbock
KQBR	FM	99.5	C	Country	Lubbock, TX	07/02/2003	179	Townsquare Media LLC	Lubbock, TX	Lubbock
KRBL	FM	105.7	C	Religion	Lubbock, TX	07/02/2003	179	Benavides, Albert & Ricky	Idalou, TX	Lubbock
KRFE	AM	580	C	SftAC/News	Lubbock, TX	07/02/2003	179	KRFE Radio Inc	Lubbock, TX	Lubbock
KTTU	FM	104.3	C	Sports	Lubbock, TX	02/09/2004	179	Ramar Communications	Brownfield, TX	Terry
KTTZ	FM	89.1	NC	Classical	Lubbock, TX	07/02/2003	179	Texas Tech University	Lubbock, TX	Lubbock
KTXT	FM	88.1	NC	News/Jazz	Lubbock, TX	07/02/2003	179	Texas Tech University	Lubbock, TX	Lubbock
KXTQ	FM	93.7	C	Tejano	Lubbock, TX	07/02/2003	179	Ramar Communications	Lubbock, TX	Lubbock
KZII	FM	102.5	C	CHR	Lubbock, TX	07/02/2003	179	Townsquare Media LLC	Lubbock, TX	Lubbock

Number of Stations in Geographic Market 27

## Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed

# Lubbock Radio Station Voices

Voices	Call Signs	AM or FM	Format	Market Name	City of License	State of License	Owner	Parent	AM Frequency	FM Frequency	Power-Day/FM	Power-Night	HAAT	Class
1	KEJS	FM	Tejano	Lubbock, TX	Lubbock	TX	Barton Broadcasting Co	Barton Broadcasting Co	0	106.5	34	0	587	C2
2	KAMZ	FM	Mexican	Lubbock, TX	Tahoka	TX	Benavides, Albert	Benavides, Albert	0	103.5	20	0	328	C3
	KRBL	FM	Religion	Lubbock, TX	Idalou	TX	Benavides, Albert & Ricky	Benavides, Albert & Ricky	0	105.7	5.5	0	328	A
3	KKLU	FM	Chrst/Altve	Lubbock, TX	Lubbock	TX	Educational Media Foundation	Educational Media Foundation	0	90.9	20	0	597	C2
4	KAIQ	FM	Mexican	Lubbock, TX	Wolfforth	TX	Entravision Holdings LLC	Entravision Holdings LLC	0	95.5	100	0	676	C1
	KBZO	AM	Span/AdHts	Lubbock, TX	Lubbock	TX	Entravision Holdings LLC	Entravision Holdings LLC	1460	0	1	0.243	0	B
5	KAMY	FM	Inspr/Chrst	Lubbock, TX	Lubbock	TX	Family Life Communications Inc	Family Life Communications Inc	0	90.1	63	0	482	C1
6	KRFE	AM	StAC/Chrst	Lubbock, TX	Lubbock	TX	KRFE Radio Inc	KRFE Radio Inc	580	0	0.5	0.29	0	B
7	KJTV	AM	News/Talk	Lubbock, TX	Lubbock	TX	Ramar Communications	Ramar Communications	950	0	5	0.5	0	B
	KLZK	FM	HOT AC/AC	Lubbock, TX	New Deal	TX	Ramar Communications	Ramar Communications	0	97.3	32	0	614	C2
	KTTU	FM	Sports	Lubbock, TX	Brownfield	TX	Ramar Communications	Ramar Communications	0	104.3	50	0	476	C2
	KXTQ	FM	Tejano	Lubbock, TX	Lubbock	TX	Ramar Communications	Ramar Communications	0	93.7	100	0	743	C1
8	KDAV	AM	Oldies	Lubbock, TX	Lubbock	TX	Renaissance Broadcasting	Renaissance Broadcasting	1590	0	1	1	0	B
9	KTTZ	FM	Classical	Lubbock, TX	Lubbock	TX	Texas Tech University	Texas Tech University	0	89.1	70	0	568	C1
	KTXT	FM	News/Jazz	Lubbock, TX	Lubbock	TX	Texas Tech University	Texas Tech University	0	88.1	35	0	423	C2
10	KFMX	FM	Rock	Lubbock, TX	Lubbock	TX	Townsquare Media LLC	Townsquare Media LLC	0	94.5	100	0	817	C1
	KFYO	AM	Nws/Tlk/Spt	Lubbock, TX	Lubbock	TX	Townsquare Media LLC	Townsquare Media LLC	790	0	5	1	0	B
	KKAM	AM	Sprts/Talk	Lubbock, TX	Lubbock	TX	Townsquare Media LLC	Townsquare Media LLC	1340	0	1	1	0	C
	KKCL	FM	Oldies	Lubbock, TX	Lorenzo	TX	Townsquare Media LLC	Townsquare Media LLC	0	98.1	36	0	574	C2
	KQBR	FM	Country	Lubbock, TX	Lubbock	TX	Townsquare Media LLC	Townsquare Media LLC	0	99.5	100	0	817	C1
	KZII	FM	CHR	Lubbock, TX	Lubbock	TX	Townsquare Media LLC	Townsquare Media LLC	0	102.5	100	0	817	C1
11	KJDL	AM	News/Talk	Lubbock, TX	Lubbock	TX	Walker Broadcasting & Communications Ltd	Walker Broadcasting & Communications Ltd	1420	0	0.5	0.14	0	D
12	KBTE	FM	Urban CHR	Lubbock, TX	Tulia	TX	Wilks Broadcast Group LLC	Wilks Broadcast Group LLC	0	104.9	99	0	978	C1
	KLLL	FM	Country	Lubbock, TX	Lubbock	TX	Wilks Broadcast Group LLC	Wilks Broadcast Group LLC	0	96.3	100	0	817	C1
	KMMX	FM	AdHts/Top40	Lubbock, TX	Tahoka	TX	Wilks Broadcast Group LLC	Wilks Broadcast Group LLC	0	100.3	100	0	883	C1
	KONE	FM	Clsc Rock	Lubbock, TX	Lubbock	TX	Wilks Broadcast Group LLC	Wilks Broadcast Group LLC	0	101.1	100	0	883	C1
13	KJAK	FM	Chrst/Talk	Lubbock, TX	Slaton	TX	Williams Broadcasting Group	Williams Broadcasting Group	0	92.7	100	0	584	C1

Source: BIA Media Access Pro Database (Version 4.6) (data as of 1/26/2012).

## Lubbock DMA TV Station Voices

Voices	Call Signs	Lic. Channel	Affiliation	Lic. Market Name	Lic. City of License	Lic. State of License	Lic. County	Owner	Parent	Lic. Power	Lic. HAAT	Type Service	Grade B Overlap
1	KAMC	28	ABC	Lubbock, TX	Lubbock	TX	Lubbock	Mission Broadcasting Inc	Mission Broadcasting Inc	2000	840	MAIN	Yes
2	KCBD	11	NBC	Lubbock, TX	Lubbock	TX	Lubbock	Raycom Media Incorporated	Raycom Media Incorporated	316	761	MAIN	Yes
--	KJTV-TV	34	FOX	Lubbock, TX	Lubbock	TX	Lubbock	Ramar Communications	Ramar Communications	3720	840	MAIN	N/A
3	KLBK-TV	13	CBS	Lubbock, TX	Lubbock	TX	Lubbock	Nexstar Broadcasting Group Inc	Nexstar Broadcasting Group Inc	316	879	MAIN	Yes
4	KLCW-TV	22	CW	Lubbock, TX	Wolfforth	TX	Lubbock	Woods Communications Corporation	Woods Communications Corporation	142	748	MAIN	Yes
5	KPTB-DT	16	IND	Lubbock, TX	Lubbock	TX	Lubbock	Prime Time Christian Broadcasting Incorporated	Prime Time Christian Broadcasting Incorporated	214	272	MAIN	Yes
6*	KTXT-TV	5	PBS	Lubbock, TX	Lubbock	TX	Lubbock	Texas Tech University	Texas Tech University	100	742	PUB	Yes

\* Also represented on Radio Voice list.

Source: BIA Media Access Pro Database (Version 4.6) (data as of 1/26/2012).

## Lubbock DMA Daily Newspaper Voice

Voice	Newspaper Name	County of Circulation	Owner	Circulation (Avg M-F)*	2011-2012 Niesen	Percentage of
					DMA TV Population	DMA TV Population
1	The Lubbock Avalanche-Journal	Lubbock Co.	Morris Communications Co.	34,836	160,160	24.25%

\* Circulation averages for the six months ended 9/30/2011. Source: Audit Bureau of Circulations, FAS-FAX Report - 9/24/2011.



## Lubbock DMA Cable System Voice

Voice	Cable System	County of Operation	Owner
1*	Reach Broadband	Lubbock Co.	RB3 LLC
2*	Suddenlink Communications	Lubbock Co.	Cequel Communications Holdings I, LLC

\* Counts only as a single voice for purposes of the radio-television cross ownership rule.

Source: 2012 Television & Cable Factbook, Vol. 80, Warren Communications News.