

RADIO-TELEVISION CROSS OWNERSHIP STATEMENT

Under the Radio-Television Cross Ownership Rule currently in effect, 47 C.F.R. § 73.3555(c) ("Section 73.3555(c)"), the Commission has authorized the Media Bureau to allow ownership of up to two television stations and six commercial radio stations, subject to compliance with the local radio ownership limits, if at least "20 independently owned voices would remain in the market" (the "20-Voice Test").¹ Also, under Section 73.3555(c), if a party could own two television stations and six commercial radio stations, it instead may own one television station and seven radio stations, subject to compliance with the local radio ownership limits.

For purposes of the 20-Voice Test, the Commission has identified each of the following as an independent voice:

- any independently owned and operated full power television station within the DMA of the television station's community of license;
- any independently owned full power radio station (commercial or noncommercial) that is either located in or has a reportable Arbitron share in the radio metro market where each relevant broadcast station is located;
- any English-language newspaper published at least four days a week within the television station's DMA and that have a circulation exceeding 5 percent of the DMA's households; and
- one cable system, if the cable service is "generally available to households in the DMA."

¹ See *In the Matter of Review of the Commission's Regulations Governing Television Broadcasting, Television Satellite Stations Review of Policy and Rules*, MM Docket Nos. 91-221 and 87-8, Report and Order, 14 FCC Rcd 12903 at ¶¶ 100, 111 (1999).

The following two television stations in the Memphis, TN DMA and six radio stations in the Memphis, TN Arbitron Radio Metro (the "Stations") are currently under common control, through ownership by subsidiaries of Clear Channel Communications, Inc. ("CCC"):

Station	Facility ID	Community of License	Relevant Market under § 73.3555(c)
WPTY-TV	11907	Memphis	Memphis, TN
WLMT (TV)	68518	Memphis	Memphis, TN
WEGR (FM)	58397	Arlington	Memphis, TN
KJMS (FM)	35874	Olive Branch	Memphis, TN
WDIA (AM)	69569	Memphis	Memphis, TN
WHAL-FM	58399	Horn Lake	Memphis, TN
WHRK (FM)	54916	Memphis	Memphis, TN
WREC (AM)	58396	Memphis	Memphis, TN

This existing combination of two television stations and six radio stations is permitted in accordance with Section 73.3555(c), provided the combination also complies with the local radio ownership limits. This instant statement of compliance with Section 73.3555(c) is being provided in connection with an application for a construction permit for the minor modification of radio station WEGR(FM), Arlington, TN. Also being submitted with such minor modification application is a showing that this combination of six radio stations complies with the local radio ownership limits.

The following count of relevant other media demonstrates that the combination of two television and six radio stations in this DMA is permitted, as the 20 Voice Test is met. Just counting independent broadcast voices, the Memphis Market

has well over 20 voices. Moreover, given that there are at least eight independently owned full power television stations, this is a market that supports common ownership of two television stations under the local television (duopoly) rule; thereby permitting the common ownership of two television and six radio stations.

ELIGIBLE RADIO VOICES IN MEMPHIS, TN RADIO METRO: ^{2 3}
(as grouped by owner)

Calls	Fac ID	Band	Owner	Community
WCNA	50294	FM	Air South Radio Inc	Potts Camp
KBCM	84785	FM	American Family Association Incorporated	Blytheville
KOUX	76841	FM		Blytheville
WKRA	5333	AM	Autry, Billy	Holly Springs
WKRA-FM	5334	FM		Holly Springs
WCRV	6486	AM	Bott Radio Network	Collierville
WBBP	6542	AM	Bountiful Blessings	Memphis
WMC	19185	AM		Memphis
WMC-FM	59449	FM	CBS Radio	Memphis
WMFS	4653	FM		Bartlett
WGKX	35009	FM		Memphis
WMPW	33671	FM	Citadel Communications	Munford
WRBO	7075	FM		Como
WXMx	35399	FM		Millington
KJMS	35874	FM	Clear Channel Communications	Olive Branch
WDIA	69569	AM		Memphis
WEGR	58397	FM		Arlington

² A station is considered to be "located in an Arbitron Metro" if the station's community of license is located within the boundaries of that Metro, or, the station is listed as "Home" to that Metro by BIA.

³ Arbitron data presented herein is obtained from BIA's "Media Access Pro."

WHAL-FM	58399	FM		Horn Lake
WHRK	54916	FM		Memphis
WREC	58396	AM		Memphis
KWAM	35873	AM	Concord Media Group Incorporated	Memphis
WKBL	57887	AM	Covington Broadcasting	Covington
WKBQ	57886	FM		Covington
WLRM	15670	AM	CPT&T Radio Station Inc	Millington
KKLV	52903	FM		Turrell
WKVF	859	FM	Educational Media Foundation	Byhalia
WPLX	52906	AM		Germantown
WMBZ	2686	FM		Germantown
WRVR-FM	34375	FM	Entercom	Memphis
WWTQ	34374	AM		Memphis
WMQM	42369	AM	F.W. Robbert Broadcasting	Lakeland
WSTN	8062	AM	Family Worship Center Church Inc	Somerville
WVIM-FM	16790	FM	First Broadcasting Investment Partners, LLC	Coldwater
KBUD	89397	FM		Sardis
KXHT	5213	FM		Marion
WAVN	2801	AM		Southaven
WGSF	65207	AM		Memphis
WHBQ	21727	AM		Memphis
WHBQ-FM	50330	FM	Flinn Broadcasting Corporation	Germantown
WIVG	67247	FM		Tunica
WMPS	2802	AM		Bartlett
WOWW	21728	AM		Germantown
KCJF	78214	FM		Earle
WLOK	24214	AM	Gilliam Communications Inc	Memphis
WQOX	41147	FM	Memphis City Schools	Memphis
WYPL	13996	FM	Memphis Public Library & Info Center	Memphis

WKNO-FM	41887	FM	Mid-South Public Communications Foundation	Memphis
WURC	58271	FM	Rust College	Holly Springs
KQPN	48749	AM	Simmons Media Group Inc	West Memphis
WEVL	61272	FM	Southern Communication Volunteers Inc	Memphis
KAMJ	24666	FM		Gosnell
KHLS	63607	FM		Blytheville
KLCN	63606	AM	Sudbury Broadcast Group	Blytheville
KOSE	52902	AM		Wilson
KQDD	52904	FM		Osceola
WUMR	66625	FM	University of Memphis	Memphis

ELIGIBLE TELEVISION VOICES IN SALT LAKE CITY DMA: ⁴
(as grouped by owner)

CALLS	Channel	City of License	Owner
NEW	56	Memphis	Mid-South Public Communications
WKNO	10	Memphis	Foundation
WMAV-TV	18	Oxford	Mississippi Authority for Educational Television
WHBQ-TV	13	Memphis	Fox Television Broadcasting Incorporated
WMC-TV	5	Memphis	Raycom Media Incorporated
WPXX-TV	50	Memphis	Flinn Broadcasting Corporation
NEW	14	Memphis	Christian Worldview Broadcasting Corporation
WPTY-TV	24	Memphis	Clear Channel Communications
WLMT	30	Memphis	
WREG-TV	3	Memphis	New York Times Co
WBUY-TV	40	Holly Springs	Trinity Broadcasting Network Inc

TOTAL NUMBER OF INDEPENDENT BROADCAST VOICES IN RELEVANT MARKET:

33

⁴ DMA data presented herein is obtained from BIA's "Media Access Pro."

Conclusion

Since there are at least eight independent television voices and there are at least 20 independent media voices in this market, either two television stations and six radio stations or one television and seven radio stations can be commonly owned in this market, subject to compliance with the local radio ownership rules. As demonstrated in the local radio ownership analysis for this application, the proposal to modify WEGR(FM), Memphis, TN complies with Section 73.3555(a), the local radio ownership rule. Consequently, this combination of two television and six radio stations also complies with Section 73.3555(c).

Respectfully submitted,

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