

Section III, Question 6(b) Multiple Ownership Compliance

The instant application seeks FCC consent to the assignment of the license of radio station WNBP(AM), Newburyport, Massachusetts (FIN 15338) (“WNBP”) and FM translator station W291CC, Newburyport, Massachusetts (FIN 150780) (“W291CC”),¹ from Port Broadcasting, LLC, to Bloomberg Radio Newburyport LLC (“Bloomberg”). As demonstrated below, Bloomberg’s acquisition of WNBP fully complies with the Commission’s multiple ownership rules set forth in 47 C.F.R. § 73.3555.

WNBP is assigned by Nielsen Audio to the Boston, Massachusetts radio metro market (the “Boston market”), and is geographically within the boundaries of the Boston market. According to BIA Kelsey, there are 100 radio stations assigned to the Boston market and within the geographic boundaries of the Boston market. Section 73.3555(a) provides that in a radio market with 45 or more radio stations in the market, an entity may own up to 8 commercial radio stations, and not more than 5 commercial stations in the same service (AM or FM).

Bloomberg is not currently the licensee of any broadcast radio station in the Boston market. Bloomberg Communications Inc., a separate subsidiary that is under common ownership with Bloomberg, has entered into a time brokerage agreement to provide more than 15% of the broadcast time per week on Boston market stations WRCA(AM), Watertown, MA (FIN 60695) and the HD2 channel of WBOS(FM), Brookline, MA (FIN 23439), both of which are licensed to Beasley Media Group, LLC and are within the geographic boundaries of the Boston market. Bloomberg Communications Inc. has also entered into a time brokerage agreement to provide more than 15% of the broadcast time per week on WXKS(AM), Newton, MA (FIN 20441) and the HD2 channel of WJMN(FM), Boston, MA (FIN 53972), both of which are licensed to CAPSTAR TX LLC and are within the geographic boundaries of the Boston market. Thus, Bloomberg will have an attributable interest in three AM stations and two FM stations in the Boston market.² Bloomberg therefore complies with the local radio ownership rule with respect to the Boston market.

Except as set forth above, neither Bloomberg nor any person or entity with a cognizable interest in Bloomberg holds any attributable interests in any medium of mass communication in the Boston market, and thus this application complies with the Commission’s multiple ownership rules.

¹ Because FM translator stations are not considered for purposes of the Commission’s multiple ownership rules, W291CC will not be analyzed here.

² See 47 C.F.R. § 73.3555, Note 2(j)(1).