

EXHIBIT 16
(Page 1 of 7)

MULTIPLE OWNERSHIP CONSIDERATIONS

Gateway Creative Broadcasting, Inc.
Clayton, MO

The proposed acquisition of KFUE-FM will result in attributable common ownership between KFUE-FM, KHZR(FM) - Potosi, Missouri, and KPVR(FM) - Bowling Green, Missouri.¹ According to Version 4.5 of the BIA Financial Network's *Media Access Pro* computer software,² KFUE-FM is considered to be "home" to the Saint Louis, Missouri Arbitron Metro Market, while neither KHZR nor KPVR is considered to be "home" to any Arbitron Metro Market. Based on this information, the proposed assignment of the KFUE-FM license will only result in the ownership of a single station in this metro market, which is permitted in any market, regardless of size, by Section 73.3555 of the FCC Rules.

Figure 6.0 is a map exhibit depicting the 3.16 mV/m principal community contours for KFUE-FM, KHZR, and KPVR. These contours were projected using the notified facilities for each station from the FCC's Consolidated Database System ("CDBS") and terrain data extracted from the NGDC 30 second terrain database. As shown in this map exhibit, there is overlap between the principal community contours of KHZR and KFUE-FM, but the principal community contour for KPVR doesn't overlap the principal community contour for either KHZR or KFUE-FM. As a result, it was necessary to conduct contour overlap studies³ for the contour based market defined by the principal com-

¹The proposed assignee doesn't have an attributable ownership interest in any other radio or television stations.

²The program databases utilized in this analysis were most recently updated on January 4, 2010.

³These contour overlap studies were conducted utilizing the modified contour overlap methodology outlined in Paragraph 285 of the FCC's July 2, 2003 *Report and Order and Notice of Proposed Rule-making* in MB Dockets 02-277, 01-235, 01-317, 00-244, and 03-130.

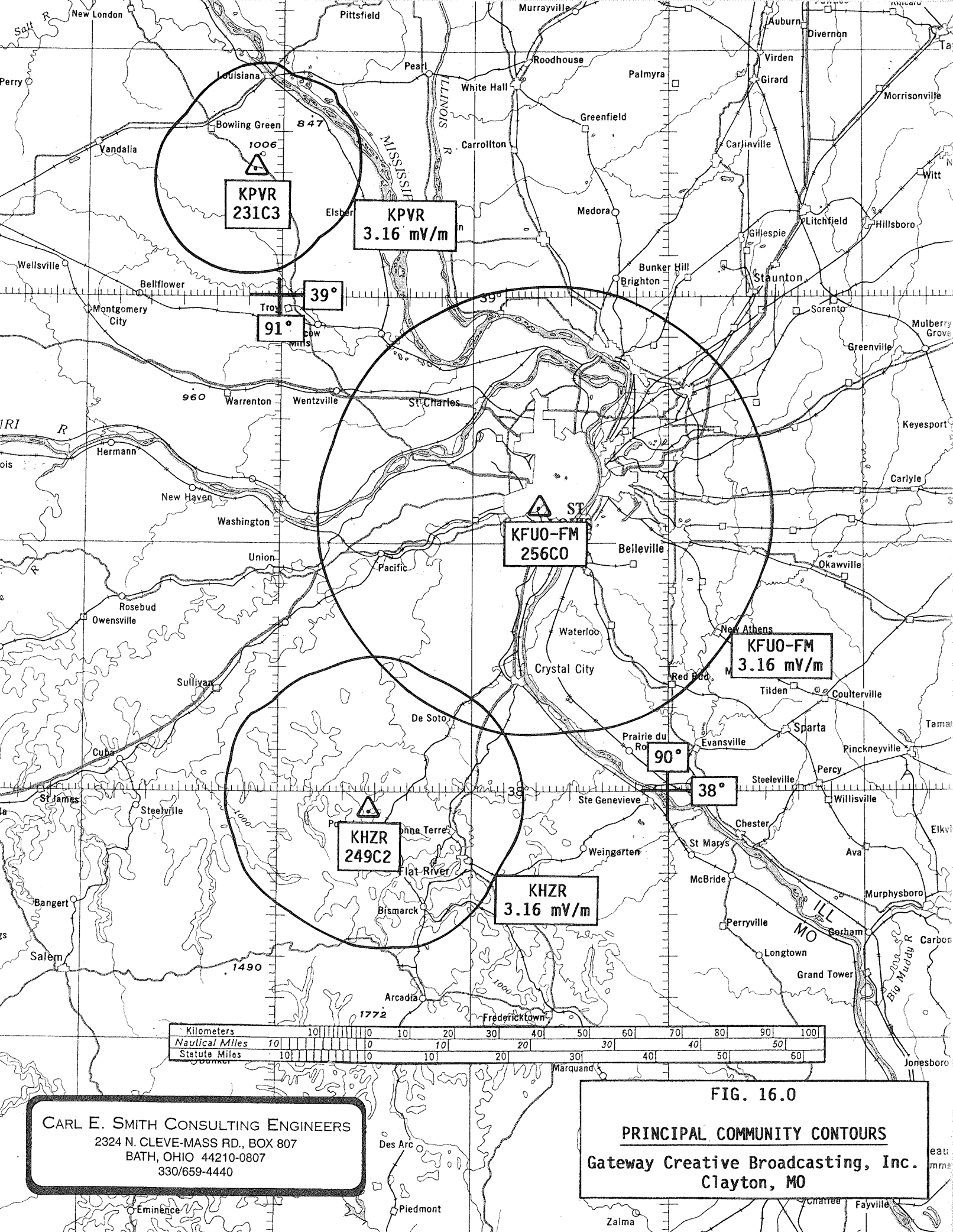
EXHIBIT 19
(Page 2 of 7)

munity contour overlap between KHZR and KFUEO-FM to document that the common ownership of these two stations will comply with the local radio ownership restrictions outlined in Section 73.3555 of the FCC Rules.

Figure 6.1 shows the composite principal community contour for this contour based market, which is defined by the principal community contour overlap between KHZR and KFUEO-FM. Also shown in this figure are the transmitter sites of all operating stations located within this composite contour. Table 6.1 is a tabulation of the stations depicted in this figure. As shown by this data, there are 57 stations, including KHZR and KFUEO-FM, in the contour based market defined by these two stations.⁴ In markets containing 45 or more stations, Section 73.3555(a)(1)(i) of the FCC Rules permits the common ownership of up to 8 commercial stations, not more than 5 of which are in the same service. The instant situation involves the common ownership of two commercial FM stations in this contour based market, which does not exceed the permitted maximum.

Based upon the above information, the proposed assignment of the license for KFUEO-FM will fully comply with the local radio ownership restrictions outlined in Section 73.3555 of the FCC Rules.

⁴Even more stations would be considered to be part of this contour based market if stations whose transmitter sites are located outside this composite contour, but whose principal community contour overlaps this composite contour were included in this total. No such further analysis is necessary in this case, however, since the common ownership of these two stations in this contour based market is shown to comply with the local radio ownership restrictions without including these additional stations in this analysis.



KPVR
231C3

KPVR
3.16 mV/m

KFUO-FM
256C0

KFUO-FM
3.16 mV/m

KHZR
249C2

KHZR
3.16 mV/m

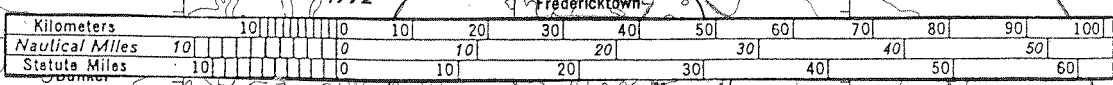
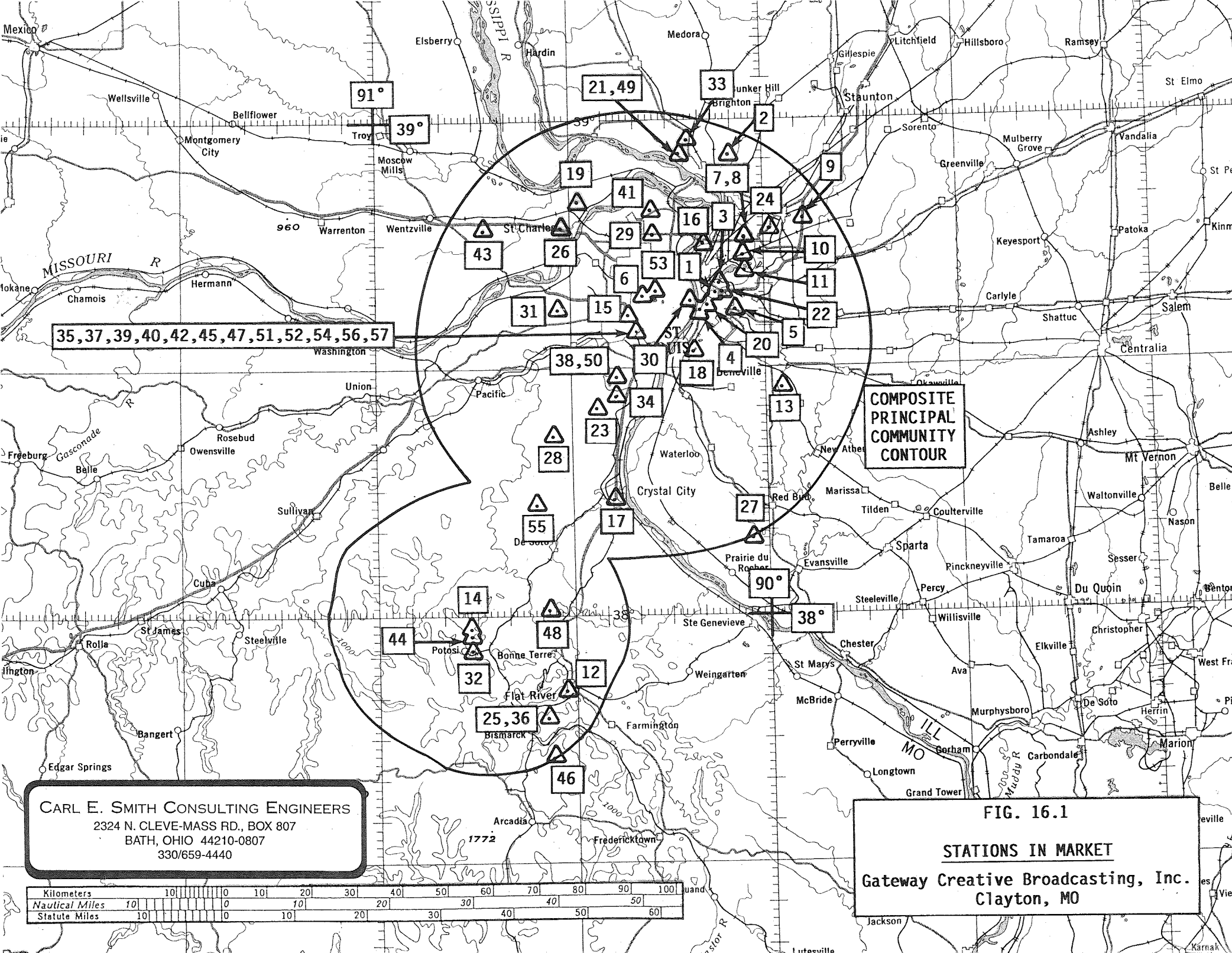


FIG. 16.0

PRINCIPAL COMMUNITY CONTOURS

Gateway Creative Broadcasting, Inc.
Clayton, MO

CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440



35,37,39,40,42,45,47,51,52,54,56,57

COMPOSITE
PRINCIPAL
COMMUNITY
CONTOUR

CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
330/659-4440

FIG. 16.1
STATIONS IN MARKET
Gateway Creative Broadcasting, Inc.
Clayton, MO

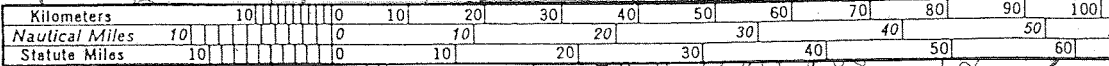


TABLE 16.1

STATIONS IN MARKET
 Gateway Creative Broadcasting, Inc.
 Clayton, MO

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
1	KTRS	550	St. Louis, MO
2	KFNS	590	Wood River, IL
3	KJSL	630	St. Louis, MO
4	KSTL	690	St. Louis, MO
5	WEW	770	St. Louis, MO
6	KFUO	850	Clayton, MO
7	WGNU	920	Granite City, IL
8	KXEN	1010	St. Louis, MO
9	WRYT	1080	Edwardsville, IL
10	KMOX	1120	St. Louis, MO
11	KQQZ	1190	DeSoto, MO
12	KFMO	1240	Flat River, MO
13	WSDZ	1260	Belleville, IL
14	KYRO	1280	Potosi, MO
15	KSIV	1320	Clayton, MO
16	KSLG	1380	St. Louis, MO
17	KJFF	1400	Festus, MO
18	KZQZ	1430	St. Louis, MO
19	KHOJ	1460	St. Charles, MO
20	WFFX	1490	East St. Louis, IL
21	WBGZ	1570	Alton, IL
22	KATZ	1600	St. Louis, MO
23	KDHX	201C1	St. Louis, MO
24	WSIE	204B	Edwardsville, IL

TABLE 16.1 (cont'd)

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
25	KSEF	205C2	Farmington, MO
26	KCLC	206C2	St. Charles, MO
27	KTBJ	207B	Festus, MO
28	KNLH	208A	Cedar Hill, MO
29	KCFV	208A	Ferguson, MO
30	WCBW-FM	209A	East St. Louis, IL
31	KGNX	209A	Ballwin, MO
32	KNLP	209A	Potosi, MO
33	WLCA	210A	Godfrey, IL
34	KGNA-FM	210A	Arnold, MO
35	KWMU	214C1	St. Louis, MO
36	KBGM	216C2	Park Hills, MO
37	KSIV-FM	218C1	St. Louis, MO
38	WIL-FM	222C0	St. Louis, MO
39	KSD	229C1	St. Louis, MO
40	KSHE	234C0	Crestwood, MO
41	WFUN-FM	238C3	Bethalto, IL
42	KIHT	242C1	St. Louis, MO
43	KFTK	246C1	Florissant, MO
44	KHZR	249C2	Potosi, MO
45	KYKY	251C1	St. Louis, MO
46	KTJJ	253C	Farmington, MO
47	KFUO-FM	256C0	Clayton, MO
48	KDJR	261A	DeSoto, MO
49	WSDD	262B	Alton, IL
50	WXOS	266C1	East St. Louis, IL
51	KEZK-FM	273C0	St. Louis, MO

TABLE 16.1 (cont'd)

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
52	KLOU	277C1	St. Louis, MO
53	WHHL	281C2	Hazelwood, MO
54	KMJM-FM	285C3	Columbia, IL
55	KPNT	289C	St. Genevieve, MO
56	WARH	293C1	Granite City, IL
57	KSLZ	299C0	St. Louis, MO