

EXHIBIT 16  
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MULTIPLE OWNERSHIP CONSIDERATIONS  
Gateway Creative Broadcasting, Inc.  
Clayton, MO

The proposed acquisition of KFUO-FM will result in attributable common ownership between KFUO-FM, KHZR(FM) - Potosi, Missouri, and KPVR(FM) - Bowling Green, Missouri.<sup>1</sup> According to Version 4.5 of the BIA Financial Network's *Media Access Pro* computer software,<sup>2</sup> KFUO-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 KFUO-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 KFUO-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 KFUO-FM, but the principal community contour for KPVR doesn't overlap the principal community contour for either KHZR or KFUO-FM. As a result, it was necessary to conduct contour overlap studies<sup>3</sup> for the contour based market defined by the principal com-

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

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

<sup>3</sup>These 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.

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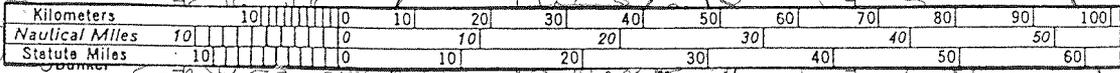
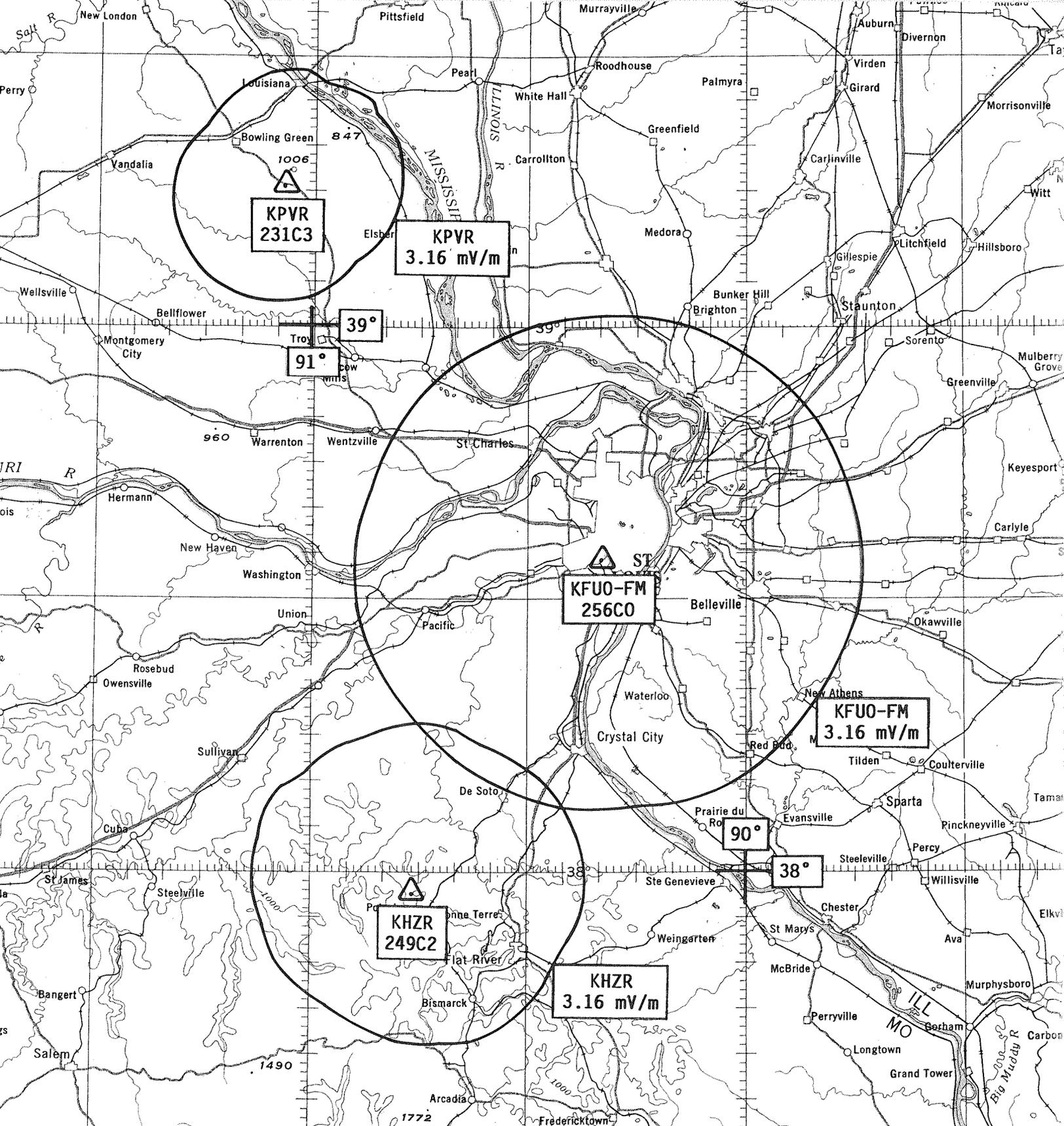
munity contour overlap between KHZR and KFUO-FM to document that the common ownership of these two stations will comply with the local radio ownership restrictions outlined in Section 73.3555 of the FCC Rules.

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 KFUO-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 KFUO-FM, in the contour based market defined by these two stations.<sup>4</sup> 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 KFUO-FM will fully comply with the local radio ownership restrictions outlined in Section 73.3555 of the FCC Rules.

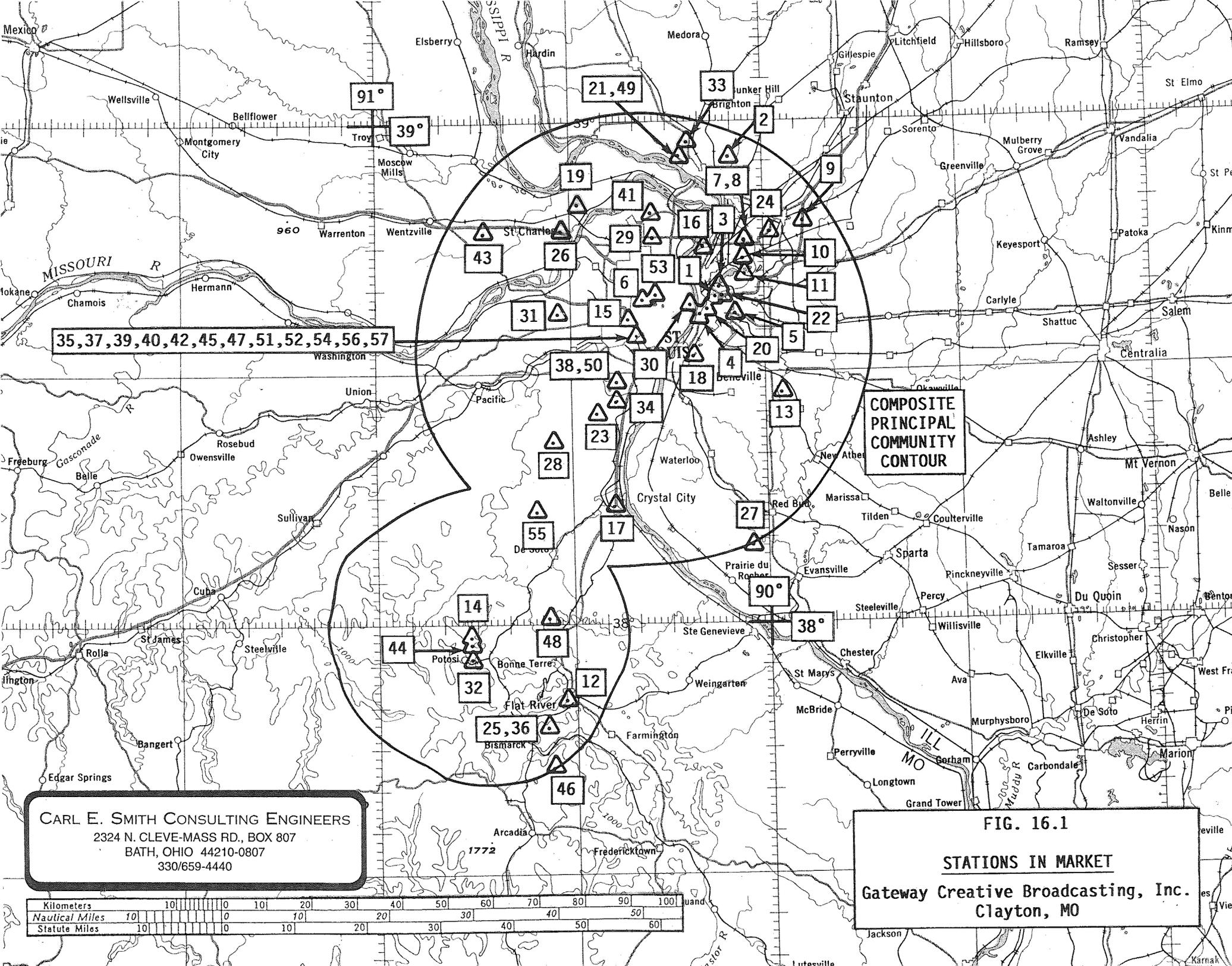
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<sup>4</sup>Even more stations would be considered to be part of this contour based market if stations whose transmitter sites are located outside this composite contour, but whose principal community contour overlaps this composite contour were included 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.



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**FIG. 16.0**  
**PRINCIPAL COMMUNITY CONTOURS**  
 Gateway Creative Broadcasting, Inc.  
 Clayton, MO



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

COMPOSITE  
PRINCIPAL  
COMMUNITY  
CONTOUR

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

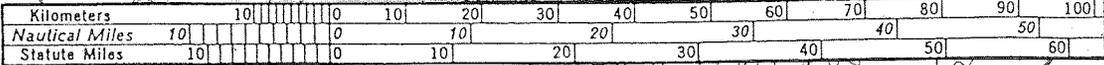


TABLE 16.1

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