

EXHIBIT 15

PHOENIX, ARIZONA MARKET

This exhibit is being submitted to demonstrate that the acquisition proposed in the instant application complies with the local radio ownership limits.

In this application, Bonneville Holding Company ("BHC"), as assignee, proposes to acquire the licenses of radio station KKFR(FM), licensed to Glendale, Arizona. BHC currently holds the licenses of radio stations KTAR(AM), KMVP(AM) and KPKX(FM), all licensed to Phoenix, Arizona. Neither BHC nor any of its owners or affiliates have any other attributable interests in any other broadcast stations or other media outlets in the Phoenix, Arizona area.

Section 73.3555(a) of the Commission's rules provides that in a radio market with 45 or more radio stations, a party may hold a cognizable interest in up to eight commercial radio stations, no more than five of which are in the same service. There are more than 45 radio stations in the Phoenix, Arizona Arbitron Market (See Attachment A) and BHC will only hold the licenses for four radio stations after completion of the proposed transaction. Thus, BHC can hold the licenses for radio stations KKFR(FM), KTAR(AM), KMVP(AM) and KPKX(FM) under the Commission's local radio ownership rule.