

EXHIBIT 17

Local Radio Ownership

By this application, Palm Beach Broadcasting License LLC (“PBB”) seeks to acquire the licenses of WIRK-FM, West Palm Beach, Florida; WMBX(FM), Jensen Beach, Florida; and WPBZ(FM), Indiantown, Florida (the “Stations”). The instant application implicates the Commission’s local radio ownership rule because PBB and the parties to this application with an attributable interest in PBB also have an interest in one additional station licensed to the same Arbitron Metro Market as the Stations.¹

Under Section 73.3555(a)(1) of the Commission’s rules, the FCC uses a tiered approach, as described below, to determine whether a combination of commonly-owned radio stations complies with the local radio ownership limits for any particular market.²

Full-Power Commercial and Noncommercial Stations in the Market	Maximum Number of Stations in Which a Single Entity May Have an Attributable Interest	Maximum Number of Stations in the Same Service
45 or More Stations	8 Radio Stations	5
Between 30 and 44 Stations	7 Radio Stations	4
Between 15 and 29 Stations	6 Radio Stations	4
14 or Fewer Stations	5 Radio Stations (Provided that no entity may have an interest in more than 50% of the stations in the market)	3

To determine the number of stations in a market, the Commission relies on one of three methodologies:

1. Arbitron Methodology: When more than one commonly owned radio station is licensed to a community within an Arbitron Metro Market, the Commission counts the number of commercial and noncommercial radio stations that are either “home” to the Arbitron market or are licensed to a community within that market (the “Arbitron Methodology”).³

2. Contour Methodology: For combinations that are licensed to communities outside an Arbitron market, the Commission defines the market as the area where the principal community contours for the commonly-owned stations overlap. To determine the number of stations in that market, the Commission counts all stations whose principal community contours overlap that of at least one of the commonly-owned

¹ See 2002 Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, *Report & Order & Notice of Proposed Rulemaking*, 18 FCC Rcd 13,620, ¶¶ 279-86 (2003) (“Biennial Review”).

² See 47 C.F.R. 73.3555(a)(1).

³ See *Biennial Review*, 18 FCC Rcd at ¶ 280.

stations. The Commission, however, excludes all stations whose transmitters are greater than 92 kilometers from the mutual overlap area and any commonly owned stations that are not included already in the market.⁴

3. Arbitron-Contour Hybrid Methodology: The Commission requires an analysis under both the Arbitron Methodology and the Contour Methodology in two situations: (i) if at least one of the commonly-owned stations is “home” to an Arbitron market but it is licensed to a community outside that market or (ii) if a station is licensed to a community within an Arbitron market but its principal community contour overlaps that of another commonly-owned stations that is not licensed to a community within that Arbitron market.⁵

West Palm Beach-Boca Raton, Florida Combination

Upon consummation of the transaction proposed herein, PBB and the parties with an attributable interest in PBB would have an attributable interest in the following radio stations that are licensed to communities located within, or listed as “home” to, the West Palm Beach-Boca Raton, Florida Arbitron Metro Market.

Station	Community	Arbitron Market of Community	Home Market of Station
WRMF(FM)	Palm Beach, FL	West Palm Beach-Boca Raton, FL	West Palm Beach-Boca Raton, FL
WIRK-FM	West Palm Beach, FL	West Palm Beach-Boca Raton, FL	West Palm Beach-Boca Raton, FL
WMBX(FM)	Jensen Beach, FL	Ft. Pierce-Stuart-Vero Beach, FL	West Palm Beach-Boca Raton, FL
WPBZ(FM)	Indiantown, FL	Ft. Pierce-Stuart-Vero Beach, FL	West Palm Beach-Boca Raton, FL

The Arbitron Methodology is appropriate for this combination because the principal community contours of these four stations do not overlap the principal community contours of any other commonly-owned station.⁶

The BIA Media Access Pro Database identifies 32 full-power commercial and non-commercial stations as “home” to or licensed within the West Palm Beach-Boca Raton, Florida market.⁷ Therefore, in this market, PBB may hold an attributable interest in up to seven full-power, commercial radio stations, of which four may be the same service (AM or FM). Consequently, PBB’s interest in four FM stations in the West Palm Beach-Boca Raton, Florida market complies with the local radio ownership rules under the Arbitron Methodology.

⁴ See *id.* at ¶ 285.

⁵ See *id.* at ¶ 286n.606.

⁶ See *Biennial Review*, 18 FCC Rcd at ¶ 286.

⁷ See Attachment 1; BIA Financial Network “FCC Geographic Market Definition for West Palm Beach-Boca, FL.”

In addition, WMBX(FM), Jensen Beach, Florida, and WPBZ(FM), Indiantown, Florida, which are home to the West Palm Beach-Boca Raton, Florida Arbitron Metro Market, are licensed to communities located within the Ft. Pierce-Stuart-Vero Beach, Florida Arbitron Metro Market. The BIA Media Access Pro Database identifies 25 stations within that market.⁸ PBB does not currently own any station that is “home” to, or licensed to any community within, the Ft. Pierce-Stuart-Vero Beach, Florida Arbitron Metro Market. Therefore, in this market, PBB may hold an attributable interest in up to six full-power, commercial radio stations, of which four may be in the same service (AM or FM). Consequently, PBB’s acquisition of an interest in two FM stations within the Ft. Pierce-Stuart-Vero Beach, Florida Arbitron Metro Market complies with the local radio ownership rules under the Arbitron Methodology.

⁸ See Attachment 2; BIA Financial Network “FCC Geographic Market Definition, Ft. Pierce-Stuart-Vero Beach, FL.”

ATTACHMENT 1

West Palm Beach-Boca Raton, Florida Combination

Printout from BIA



FCC Geographic Market Definition for West Palm Beach-Boca

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WAFC	AM	590	C	Mexican	West Palm Beach-Boca Raton, FL	07/02/2003	49	Glades Media Company	Clewiston, FL	Hendry
WAYF	FM	88.1	NC	ChrsContem	West Palm Beach-Boca Raton, FL	07/02/2003	49	WAY-FM Media Group Inc	West Palm Beach, FL	Palm Beach
WBGF	FM	93.5	C	Mexican	West Palm Beach-Boca Raton, FL	07/02/2003	49	BGI Broadcasting LP	Belle Glade, FL	Palm Beach
WBZT	AM	1230	C	Talk	West Palm Beach-Boca Raton, FL	07/02/2003	49	Clear Channel Communications Inc	West Palm Beach, FL	Palm Beach
WDJA	AM	1420	C	News/Talk	West Palm Beach-Boca Raton, FL	07/02/2003	49	Radio Cristo Mi Redentor Universo 1420AM Inc	Delray Beach, FL	Palm Beach
WEAT	FM	104.3	C	AC	West Palm Beach-Boca Raton, FL	07/02/2003	49	CBS Radio	West Palm Beach, FL	Palm Beach
WEFL	AM	760	C	Sprts/Talk	West Palm Beach-Boca Raton, FL	07/02/2003	49	Good Karma Broadcasting LLC	Tequesta, FL	Palm Beach
WFTL	AM	850	C	BusNw/Sprt	West Palm Beach-Boca Raton, FL	07/02/2003	49	James Crystal Licenses LLC	West Palm Beach, FL	Palm Beach
WHFS	FM	106.3	C	Urban AC	West Palm Beach-Boca Raton, FL	07/02/2003	49	CBS Radio	Jupiter, FL	Palm Beach
WHTY	AM	1600	C	Ethnic	West Palm Beach-Boca Raton, FL	07/02/2003	49	Travis License Partners LLC	Riviera Beach, FL	Palm Beach
WIRK	FM	107.9	C	Country	West Palm Beach-Boca Raton, FL	07/02/2003	49	CBS Radio	West Palm Beach, FL	Palm Beach
WJBW	AM	1000	C	Oldies	West Palm Beach-Boca Raton, FL	07/02/2003	49	Treasure and Space Coast Radio	Jupiter, FL	Palm Beach
WJNO	AM	1290	C	News/Talk	West Palm Beach-Boca Raton, FL	07/02/2003	49	Clear Channel Communications Inc	West Palm Beach, FL	Palm Beach
WKGR	FM	98.7	C	Clsc Rock	West Palm Beach-Boca Raton, FL	07/02/2003	49	Clear Channel Communications Inc	Wellington, FL	Palm Beach
WKIS	FM	99.9	C	Country	Miami-Ft. Lauderdale-Hollywood, FL	07/02/2003	12	Beasley Broadcast Group	Boca Raton, FL	Palm Beach
WLDI	FM	95.5	C	CHR	West Palm Beach-Boca Raton, FL	07/02/2003	49	Clear Channel Communications Inc	Juno Beach, FL	Palm Beach
WLLY	FM	99.5	C	Mexican	West Palm Beach-Boca Raton, FL	06/13/2007	49	Glades Media Company	Palm Beach Gardens, FL	Palm Beach
WLVJ	AM	1040	C	Religion	West Palm Beach-Boca Raton, FL	07/02/2003	49	p Actualidad 1020 AM LLC	Boynton Beach, FL	Palm Beach
WMBX	FM	102.3	C	Rhymc/CHR	West Palm Beach-Boca Raton, FL	07/02/2003	49	CBS Radio	Jensen Beach, FL	Martin
WMEN	AM	640	C	Sports	West Palm Beach-Boca Raton, FL	07/02/2003	49	James Crystal Licenses LLC	Royal Palm Beach, FL	Palm Beach
WPBI	FM	90.7	NC	Classical	West Palm Beach-Boca Raton, FL	07/02/2003	49	American Public Media Group	West Palm Beach, FL	Palm Beach
WPBR	AM	1340	C	News/Talk	West Palm Beach-Boca Raton, FL	07/02/2003	49	Omnilingual Broadcasting	Lantana, FL	Palm Beach
WPBZ	FM	103.1	C	CHR	West Palm Beach-Boca Raton, FL	07/02/2003	49	CBS Radio	Indiantown, FL	Martin
WPSP	AM	1190	C	Spanish AC	West Palm Beach-Boca Raton, FL	07/02/2003	49	Q Broadcasting Corporation Inc	Royal Palm Beach, FL	Palm Beach
WRLX	FM	92.1	C	Span/Top40	West Palm Beach-Boca Raton, FL	07/02/2003	49	Clear Channel Communications Inc	West Palm Beach, FL	Palm Beach
WRMB	FM	89.3	NC	Chrst/Talk	West Palm Beach-Boca Raton, FL	07/02/2003	49	Moody Bible Institute of Chicago Incorporated	Boynton Beach, FL	Palm Beach
WRMF	FM	97.9	C	AC	West Palm Beach-Boca Raton, FL	07/02/2003	49	Palm Beach Broadcasting License LLC	Palm Beach, FL	Palm Beach
WSBR	AM	740	C	Talk	West Palm Beach-Boca Raton, FL	07/02/2003	49	Beasley Broadcast Group	Boca Raton, FL	Palm Beach
WSVU	AM	960	C	Adlt Stndrd	West Palm Beach-Boca Raton, FL	04/17/2006	49	Intermart Broadcasting	North Palm Beach, FL	Palm Beach
WSWN	AM	900	C	Gospel	West Palm Beach-Boca Raton, FL	07/02/2003	49	BGI Broadcasting LP	Belle Glade, FL	Palm Beach
WWRF	AM	1380	C	Mexican	West Palm Beach-Boca Raton, FL	07/02/2003	49	Radio Fiesta Inc	Lake Worth, FL	Palm Beach
WZZR	FM	94.3	C	Talk	West Palm Beach-Boca Raton, FL	07/02/2003	49	Clear Channel Communications Inc	Riviera Beach, FL	Palm Beach

Number of Stations in Geographic Market 32

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

ATTACHMENT 2

Ft. Pierce-Stuart-Vero Beach, Florida Combination

Printout from BIA

FCC Geographic Market Definition for Ft. Pierce-Stuart-Vero Beach, FL

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WAFC	FM	106.1	C	Mexican	Ft. Pierce-Stuart-Vero Beach, FL	10/29/2010	98	Johnson, Brian M	Okeechobee, FL	Okeechobee
WAVW	FM	92.7	C	Country	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Clear Channel Communications Inc	Stuart, FL	Martin
WCNO	FM	89.9	NC	ChrsContem	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	National Christian Network Inc	Palm City, FL	Martin
WCZR	FM	101.7	C	Talk	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Aloha Station Trust LLC	Vero Beach, FL	Indian River
WFLM	FM	104.7	C	Urban AC	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Midway Broadcasting Co	White City, FL	St Lucie
WGYL	FM	93.7	C	AC	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Treasure and Space Coast Radio	Vero Beach, FL	Indian River
WHLG	FM	101.3	C	AC	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Smith, Vernon	Port St. Lucie, FL	St Lucie
WIRA	AM	1400	C	Inspr/Talk	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Team One Media LLC	Fort Pierce, FL	St Lucie
WJFP	FM	91.1	NC	Black Gosp	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Black Media Works Inc	Fort Pierce, FL	St Lucie
WJKD	FM	99.7	C	Jack	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Treasure and Space Coast Radio	Vero Beach, FL	Indian River
WJNX	AM	1330	C	Span/Talk	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Port St. Lucie Broadcasters Inc	Fort Pierce, FL	St Lucie
WMBX	FM	102.3	C	Rhymc/CHR	West Palm Beach-Boca Raton, FL	07/02/2003	49	CBS Radio	Jensen Beach, FL	Martin
WOKC	AM	1570	C	Country	Ft. Pierce-Stuart-Vero Beach, FL	10/29/2010	98	Glades Media Company	Okeechobee, FL	Okeechobee
WOLL	FM	105.5	C	CCT/AC/CHt	Ft. Pierce-Stuart-Vero Beach, FL	01/11/2007	98	Clear Channel Communications Inc	Hobe Sound, FL	Martin
WOSN	FM	97.1	C	Adlt Stndrd	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Treasure and Space Coast Radio	Indian River Shores, FL	Indian River
WPBZ	FM	103.1	C	CHR	West Palm Beach-Boca Raton, FL	07/02/2003	49	CBS Radio	Indiantown, FL	Martin
WPHR	FM	94.7	C	Talk	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Aloha Station Trust LLC	Gifford, FL	Indian River
WPSL	AM	1590	C	Nws/Tlk/Spt	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Port St. Lucie Broadcasters Inc	Port St. Lucie, FL	St Lucie
WQCS	FM	88.9	NC	NPR/Clscl	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Indian River Community College	Fort Pierce, FL	St Lucie
WQOL	FM	103.7	C	Oldies	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Clear Channel Communications Inc	Vero Beach, FL	Indian River
WSCF	FM	91.9	NC	ChrsContem	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Central Educational Broadcasting	Vero Beach, FL	Indian River
WSJZ	FM	95.9	C	Sports	Melbourne-Titusville-Cocoa, FL	07/02/2003	102	Cumulus Media Holdings Inc	Sebastian, FL	Indian River
WSTU	AM	1450	C	BusNw/Sprt	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Port St. Lucie Broadcasters Inc	Stuart, FL	Martin
WTTB	AM	1490	C	Talk	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Treasure and Space Coast Radio	Vero Beach, FL	Indian River
WZTA	AM	1370	C	Talk/News	Ft. Pierce-Stuart-Vero Beach, FL	07/02/2003	98	Clear Channel Communications Inc	Vero Beach, FL	Indian River

Number of Stations in Geographic Market 25

Previous Stations in Geographic Market

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed