



(REFERENCE COPY - Not for submission)

Transfers

Lead File Number: **BTCED-20150720AAJ** | Submit Date: **07/20/2015** | Lead Call Sign: **KSCU** | FRN: **0013738927**  
Service: **Full Power FM** | Purpose: **Transfer of Control** | Status: **Superceded** | Status Date: **07/22/2015** | Filing Status: **Inactive**

General Information

Section	Question	Response
Attachments	Are attachments (other than associated schedules) being filed with this application?	

Fees, Waivers, and Exemptions

Section	Question	Response
Fees	Is the applicant exempt from FCC application Fees?	Yes
	Indicate reason for fee exemption:	
Waivers	Does this filing request a waiver of the Commission's rule(s)?	
	Total number of rule sections involved in this waiver request:	

Transfer Type

Question	Response
Is this application a pro forma Transfer of Control?	No
By answering "Yes" the Applicant certifies that the use of short form pro forma application is appropriate for this transaction?	
Is the Transfer Voluntary or Involuntary:	

Authorizations to be Transferred

Selected Call Signs				
Call Sign	Facility ID	File Number	Service	City, State
KSCU	59061	BTCED-20150720AAJ	FM	SANTA CLARA, CA

Transfer Questions

Question	Response
Were any of the authorizations that are the subject of this application obtained through the Commission's competitive bidding procedures (see 47 C.F.R. Sections 1.2111(a) and 73.5000)?	No
Were any of the authorizations that are the subject of this application obtained through the Commission's point system for reserved channel noncommercial educational stations (see 47 C.F.R. Sections 73.7001 and 73.7003)?	No
Have all such stations operated for at least 4 years with a minimum operating schedule since grant pursuant to the point system?	
Were any of the authorizations that are the subject of this application obtained after award of a dispositive Section 307(b) preference using the Tribal Priority, through Threshold Qualifications procedures, or through the Tribal Priority as applied before the NCE fair distribution analysis set forth in 47 C.F.R. § 73.7002(b)?	No
Have all such stations operated for at least 4 years with a minimum operating schedule since grant?	
Do both the transferor and transferee qualify for the Tribal Priority in all respects?	

LPFM Licenses Only: Has it been at least 18 months since the initial construction permit for the LPFM station was granted?	
LPFM Licenses Only: Does the assignment of the LPFM authorization satisfy the consideration restrictions of 47 CFR Section 73.865(a)(1)?	
LPFM Licenses Only: Were any of the LPFM authorizations that are subject to this application obtained through the Commission's point system for low power FM stations (see 47 CFR Section 73.872)?	
If yes to question above, have all such LPFM stations operated for at least four years since grant pursuant to the point system?" (options – Y/N. If Yes, nothing further required. No requires attachment as follows)"If no to new sub question, list pertinent authorizations in an Exhibit and include in the Exhibit a showing that the transaction is consistent with the requirements of 47 CFR Section 73.865(a)(3).	

**Licensee  
/Permittee  
Information**

**Licensee/Permittee Name, Type, and Contact Information**

Licensee/Permittee	Address	Phone	Email	FRN
<b>SANTA CLARA UNIVERSITY</b> <b>Applicant</b> Doing Business As: SANTA CLARA UNIVERSITY	500 EL CAMINO REAL SANTA CLARA, CA 95053 United States	+1 (408) 551-1890		0013738927

**Licensee  
/Permittee  
Contact  
Representatives  
(2)**

Contact Name	Address	Phone	Email	Contact Type
<b>CARY S. TEPPER, ESQ.</b> BOOTH, FRERET, IMLAY & TEPPER, P.C.	4900 AUBURN AVENUE SUITE 100 BETHESDA, MD 20814	+1 (301) 718-1818	TEPPERLAW@AOL.COM	
<b>NEW BOARD OF TRUSTEES</b>	SANTA CLARA UNIVERSITY 500 EL CAMINO REAL SANTA CLARA, CA 95053 United States	+1 (408) 551-1890		

**Licensee  
/Permittee Legal  
Certifications**

Section	Question	Response
<b>Agreements for Transfer Control of Station</b>	Licensee/Permittee certifies that: (i) it has placed its public inspection file(s) and submitted to the Commission as an Exhibit to this application copies of all agreements for the transfer of the station(s); (ii) these documents embody the complete and final understanding between Transferor and Transferee; and (iii) these agreements comply fully with the Commission's rules and policies	Yes
<b>Other Authorizations</b>	Please upload an attachment detailing the call signs, locations, and facility identifiers of all other broadcast stations in which Licensee/Permittee or any party to the application has an attributable interest.	
<b>Character Issues</b>	Licensee/Permittee certifies that neither licensee/permittee nor any party to the application has or has had any interest in, or connection with: (a) any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or any party to the application or (b) any pending broadcast application in which character issues have been raised	Yes

<b>Adverse Findings</b>	Licensee/Permittee certifies that, with respect to the Licensee/Permittee and each party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	Yes
<b>Local Public Notice</b>	Licensee/Permittee certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.	Yes
<b>Auction Authorization</b>	Licensee/Permittee certifies that more than five years have passed since the issuance of the construction permit for the station being assigned, where that permit was acquired in an auction through the use of a bidding credit or other special measure.	N/A
<b>Anti-Discrimination Certification</b>	Licensee/Permittee certifies that neither licensee/permittee nor any party to the application have violated the Commission's prohibition against discrimination on the basis of race, color, religion, national origin or sex in the sale of commercially operated AM, FM, TV, Class A TV or international broadcast stations.	Yes

Transferor Information

Transferor Name, Type, and Contact Information

Transferor	Type	Address	Phone	Email	FRN
<b>OLD BOARD OF TRUSTEES Assignor</b> Doing Business As: OLD BOARD OF TRUSTEES	Other	SANTA CLARA UNIVERSITY 500 EL CAMINO REAL SANTA CLARA, CA 95053	+1 (408) 551-1890		0013738927

Transferor Contact Representatives (1)

Contact Name	Address	Phone	Email	Contact Type
<b>CARY S. TEPPER, ESQ.</b> BOOTH, FRERET, IMLAY & TEPPER, P.C.	4900 AUBURN AVENUE SUITE 100 BETHESDA, MD 20814	+1 (301) 718-1818	TEPPERLAW@AOL.COM	

Transferor Legal Certifications

Section	Question	Response
<b>Agreements for Transfer Control of Station</b>	Transferor certifies that: (i) it has placed in Transferor's public inspection file(s) and submitted to the Commission as an Exhibit to this application copies of all agreements for the assignment /transfer of the station(s); (ii) these documents embody the complete and final understanding between Transferor and Transferee; and (iii) these agreements comply fully with the Commission's rules and policies	
	If the transaction is involuntary, the Transferor certifies that court orders or other authorizing documents have been issued and that it has placed in the licensee's/permittee's public inspection file(s) and submitted to the Commission copies of such court orders or other authorizing documents.	

Character Issues	Transferor certifies that neither transferor nor any party to the application has or has had any interest in, or connection with: (a) any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or any party to the application or (b) any pending broadcast application in which character issues have been raised	
Adverse Findings	Transferor certifies that, with respect to the Transferor and each party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	
Local Public Notice	Transferor certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.	
Auction Authorization	Transferor certifies that more than five years have passed since the issuance of the construction permit for the station being assigned, where that permit was acquired in an auction through the use of a bidding credit or other special measure.	
Anti-Discrimination Certification	Transferor certifies that neither licensee/permittee nor any party to the application have violated the Commission's prohibition against discrimination on the basis of race, color, religion, national origin or sex in the sale of commercially operated AM, FM, TV, Class A TV or international broadcast stations.	

Transferee Information

Transferee Name, Type, and Contact Information

Transferee	Type	Address	Phone	Email	FRN
NEW BOARD OF TRUSTEES Assignee Doing Business As: NEW BOARD OF TRUSTEES	Other	SANTA CLARA UNIVERSITY 500 EL CAMINO REAL SANTA CLARA, CA 95053	+1 (408) 551-1890		0013738927

Transferee Contact Representatives (1)

Contact Name	Address	Phone	Email	Contact Type
CARY S. TEPPER, ESQ.	4900 AUBURN AVENUE SUITE 100 BETHESDA, MD 20814	+1 (301) 718-1818		

Changes in Interest (0)

Party Name	Citizenship	Address	Phone	Email	Interest Before Transfer	Interest After Transfer
Empty						

Changes in Interest Certification

Question	Response
Applicant certifies that equity and financial interests not set forth by the transferee are nonattributable.	N/A

Parties to the Application (46)

Party Name	Citizenship	Address	Phone	Email	Positional Interest
JOHN M. SOBRATO	United States	10600 NORTH DE ANZA BLVD. SUITE 200 CUPERTINO CA DE 95014			<p><b>Positional Interest:</b> MEMBER, BAORD OF TRUSTEES</p> <p><b>Citizenship:</b> United States</p> <p><b>Percentage of Votes:</b> 2.1%</p> <p><b>Percentage of Total Assets:</b> 0%</p>
MICHAEL A. ZAMPELLI S.J.	United States	500 EL CAMINO REAL SANTA CLARA CA 95053			<p><b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES</p> <p><b>Citizenship:</b> United States</p> <p><b>Percentage of Votes:</b> 2.1%</p> <p><b>Percentage of Total Assets:</b> 0%</p>
AGNIESZKA WINKLER	United States	1750 TAYLOR STREET #1402 SAN FRANCISCO CA 94133			<p><b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES</p> <p><b>Citizenship:</b> United States</p> <p><b>Percentage of Votes:</b> 2.1%</p> <p><b>Percentage of Total Assets:</b> 0%</p>
CHARMAINE A. WARMENHOVEN	United States	18500 TWIN CREEKS ROAD MONTE SERENO CA 95030			<p><b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES</p> <p><b>Citizenship:</b> United States</p> <p><b>Percentage of Votes:</b> 2.1%</p> <p><b>Percentage of Total Assets:</b> 0%</p>
WILLIAM E. TERRY	United States	925 LAUREL GLEN DRIVE PALO ALTO CA 94304			<p><b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES</p> <p><b>Citizenship:</b> United States</p> <p><b>Percentage of Votes:</b> 2.1%</p> <p><b>Percentage of Total Assets:</b> 0%</p>

<b>GILBERT SUNGHERA S.J.</b>	United States	4001 WEST MCNICHOLS ROAD DETROIT MI 48221	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%
<b>MARY STEVENS</b>	United States	85 QUEENS COURT ATHERTON CA 94027	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%
<b>STEVEN J. SORDELLO</b>	United States	2029 STERLIN COURT MOUNTAIN VIEW CA 94043	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%
<b>LARRY W. SONSINI</b>	United States	650 PAGE MILL ROAD PALO ALTO CA 94304	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%
<b>JOHN A. SOBRATO</b>	United States	10600 NORTH DE ANZA BLVD. SUITE 200 CUPERTINO CA DE 94027	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%

<b>TIMOTHY SMITH</b>	United States	1304 DESCANSO DRIVE LA CANADA FLINTRIDGE C LA 91011	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>ROBERT H. SMITH</b>	United States	750 EAST GREEN ST. SUITE 203 PASADENA CA 91101	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>STEPHEN C. SCHOTT</b>	United States	404 SARATOGA AVE. SUITE 100 SANTA CLARA CA 95050	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>WILLEM P. ROELANDTS</b>	United States	26401 ESHNER COURT LOS ALTOS HILLS CA 94022	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>ELIZABETH S. RAFAEL</b>	United States	17650 BLANCHARD DRIVE MONTE SERENO CA 95030	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%

<b>EDWARD A. PANELLI</b>	United States	14656 STONERIDGE DRIVE SARATOGA CA 95070	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%
<b>KAPIL K. NANDA</b>	United States	485 ALBERTO WAY SUITE 1000 LOS GATOS CA 95032	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%
<b>JEFFREY A. MILLER</b>	United States	P.O. BOX 248 DIABLO CA 94528	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%
<b>JOSEPH M. MCSHANE S.J. FORDHAM UNIVERSITY</b>	United States	441 EAST FORDHAM ROAD BRONX NY 10458	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%
<b>RACHEL MANFRE</b>	United States	1201 GREEN ST. #5 SAN FRANCISCO CA 94109	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%



<b>JOHN C. LEWIS</b>	United States	17616 EATON LANE MONTE SERENO CA 95030	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>WILLIAM P. LEAHY S.J. BOSTON COLLEGE</b>	United States	140 COMMONWEALTH AVE. CHESTNUT HILL MA 02467	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>HEIDI LE BARON LEUPP</b>	United States	2045 GERI LANE HILLSBOROUGH CA 94010	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>TIMOTHY R. LANNON S.J. CREIGHTON UNIVERSITY</b>	United States	2500 CALIFORNIA PLAZA OMAHA NE 68178	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>JOHN P. KOEPLIN S.J. UNIVERSITY OF SAN FRANCISCO</b>	United States	2600 TURK BLVD. SAN FRANCISCO CA 94118	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%

<b>RICHARD J. JUSTICE</b>	United States	19510 GLEN UNA DRIVE SARATOGA CA 95070	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>RICHARD D. HAUGHEY</b>	United States	1050 SUFFOLK WAY LOS ALTOS CA 94024	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>ELLEN M. HANCOCK</b>	United States	P.O. BOX 169 RIDGEFIELD CT 06877	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>TIMOTHY HALEY</b>	United States	475 MARLOWE STREET PALO ALTO CA 94301	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>SALVADOR O. GUTIERREZ</b>	United States	1035 HIGHLAND CIRCLE LOS ALTOS CA 94024	<b>Positional Interest:</b> MEMBER, BOARD OF TURSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%

REBECCA M. GUERRA	United States	1420 LAKEVIEW COURT SAN MARTIN CA 95046	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
PAUL F. GENTZKOW	United States	19508 GLEN UNA DRIVE SARATOGA CA 95070	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
ROBERT J. FINOCCHIO JR.	United States	8 KNOLL VISTA ATHERTON CA 94027	<b>Positional Interest:</b> CHAIR, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
MICHAEL E. ENGH S.J.	United States	500 EL CAMINO REAL SANTA CLARA CA 95053	<b>Positional Interest:</b> PRESIDENT OF SANTA CLARA UNIV & MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
WILLIAM T. COLEMAN III	United States	278 ALTA VISTA AVE. LOS ALTOS CA 94022	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%

<b>GERALD T. COBB S.J. SEATTLE UNIVERSITY</b>	United States	924 E. CHERRY SEATTLE WA 98122	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>HOWARD S. CHARNEY</b>	United States	2820 JACKS VALLEY ROAD GENOA NV 89411	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>LOUIS M. CASTRUCCIO IRELL &amp; MANELLA LLP</b>	United States	1800 AVENUE OF THE STARS SUITE 900 LOS ANGELES CA 90067	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>WILLIAM S. CARTER</b>	United States	16349 AZTEC RIDGE DRIVE LOS GATOS CA 95030	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%
<b>MATTHEW E. CARNES S.J.</b>	United States	20057	<b>Positional Interest:</b> MEMBER, BOARD OF TURSTEEES <b>Citizenship:</b> United States <b>Percentage of Votes:</b> 2.1% <b>Percentage of Total Assets:</b> 0%

<b>MICHAEL J. CAREY</b>	United States	6817 ELAINE WAY SAN DIEGO CA 92120	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%
<b>MARGARET M. BRADSHAW</b>	United States	55 ROSEWOOD DR. ATHERTON CA 94027	<b>Positional Interest:</b> VICE CHAIR, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%
<b>KRISTI MARKKULA BOWERS</b>	United States	10799 JUNIPER COURT CUPERTINO CA 95014	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%
<b>ERICK BERRELLEZA S.J. BOSTON COLLEGE</b>	United States	188 FOSTER STREET BRIGHTON MA 02135	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%
<b>ELIZABETH ARMINTROUT</b>	United States	7519 BROKLYN AVE. NE SEATTLE WA NE 98115	<b>Positional Interest:</b> MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%

<b>PENELOPE S. ALEXANDER</b>	United States	1905 PARKSIDE AVE. HILLSBOROUGH CA 94010	<b>Positional Interest:</b> CHAIR, BOARD OF REGENTS & MEMBER, BOARD OF TRUSTEES  <b>Citizenship:</b> United States  <b>Percentage of Votes:</b> 2.1%  <b>Percentage of Total Assets:</b> 0%
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Parties to the Application Certification

Question	Response
Applicant certifies that equity and financial interests not set forth by the transferee are nonattributable.	

Transferee Legal Certifications

Section	Question	Response
Agreements for Sale	Transferee certifies that: (a) the written agreements in the Transferee's public inspection file and submitted to the Commission embody the complete and final agreement for the sale or transfer of the station(s); and (b) these agreements comply fully with the Commission's rules and policies.	Yes
Other Authorizations	Please upload an attachment detailing the call signs, locations, and facility identifiers of all other broadcast stations in which Transferee or any party to the application has an attributable interest.	N/A
Broadcast Incubator Program	Is the proposed facility the subject of an incubation proposal or a ‘reward’ waiver request under the Commission's Broadcast Incubator Program?	
Multiple Ownership	Is the Transferee or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement with the station (s) subject to this application or with any other station in the same market as the station(s) subject to this application?	No
	Transferee certifies that the proposed assignment complies with the Commission's multiple ownership rules.	Yes
	Transferee certifies that the proposed assignment: (1) does not present an issue under the Commission's policies relating to media interests of immediate family members; (2) complies with the Commission's policies relating to future ownership interests; and (3) complies with the Commission's restrictions relating to the insulation and nonparticipation of non-party investors and creditors.	Yes

	<p>Does the Transferee claim status as an "eligible entity," that is, an entity that qualifies as a small business under the Small Business Administration's size standards for its industry grouping (as set forth in 13 C.F.R. § 121-201), and holds</p> <p>(1) 30 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet; or</p> <p>(2) 15 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet, provided that no other person or entity owns or controls more than 25 percent of the outstanding stock or partnership interests; or</p> <p>(3) More than 50 percent of the voting power of the corporation that will own the media outlet (if such corporation is a publicly traded company)?</p>	No
	Does this transfer include a grandfathered cluster of stations?	No
	<p>Applicant certifies that it will come in compliance by divesting the necessary station(s) within 12 months of the consummation of this transaction to:</p> <p>A) An Eligible Entity (as defined in Item 6d, above).</p>	
	B) An Irrevocable Trust that will assign the station(s) to an Eligible Entity.	
<b>Acquisition of Control</b>	Please upload an attachment listing the file number and date of grant of FCC Form 301, 314, or 315 application by which the Commission approved the qualifications of the individual or entity with a pre-existing interest in the licensee/permittee that is now acquiring control of the licensee/permittee as a result of the grant of this application.	
<b>Character Issues</b>	<p>Transferee certifies that neither transferee nor any party to the application has or has had any interest in, or connection with:</p> <p>(a) any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or any party to the application; or</p> <p>(b) any pending broadcast application in which character issues have been raised.</p>	Yes
<b>Adverse Findings</b>	Transferee certifies that, with respect to the transferee and each party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	Yes
<b>Financial Qualifications</b>	Transferee certifies that sufficient net liquid assets are on hand or are available from committed sources to consummate the transaction and operate the station(s) for three months.	Yes
<b>Program Service Certification</b>	Transferee certifies that it is cognizant of and will comply with its obligations as a Commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.	Yes

<b>Auction Authorization</b>	Transferee certifies that where less than five years have passed since the issuance of the construction permit and the permit had been acquired in an auction through the use of a bidding credit or other special measure, it would qualify for such credit or other special measure.	
<b>Equal Employment Opportunity (EEO)</b>	If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.	

**Tranferee Alien  
Ownership**

Question	Response
1) Is the applicant a foreign government or the representative of any foreign government as specified in Section 310(a) of the Communications Act?	
2) Is the applicant an alien or the representative of an alien? (Section 310(b)(1))	
3) Is the applicant a corporation, or non-corporate entity, that is organized under the laws of any foreign government? (Section 310(b)(2))	
4) Is the applicant an entity of which more than one-fifth of the capital stock, or other equity or voting interest, is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any entity organized under the laws of a foreign country? (Section 310(b)(3))	
5) Is the applicant directly or indirectly controlled by any other entity of which more than one-fourth of the capital stock, or other equity or voting interest, is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any entity organized under the laws of a foreign country? (Section 310(b)(4))	
6) Has the applicant received a declaratory ruling(s) under Section 310(b)(4) of the Communications Act?	
6a) Enter the citation of the applicable declaratory ruling by DA/FCC number, FCC Record citation, release date, or any other identifying information.	
7) Has there been any change in the applicant's foreign ownership since issuance of the declaratory ruling(s) cited in response to Question 6?	
8) Does the applicant certify that it is in compliance with the terms and conditions of the foreign ownership declaratory ruling(s) cited in response to Question 6?	
9) In connection with this application, is the applicant filing a foreign ownership Petition for Declaratory Ruling pursuant to Section 310(b)(4) of the Communications Act?	

**Licensee  
/Permittee  
Certification**

Section	Question	Response
<b>General Certification Statements</b>	Licensee/Permittee certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Licensee/Permittee further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.	



	<p>The Licensee/Permittee certifies that neither the Licensee /Permittee nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1.2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification § 1.2002(c). The Licensee/Permittee certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.</p>	
<b>Authorized Party to Sign</b>	<p><b>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</b></p> <p>Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application.</p> <p>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND /OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).</p>	
	<p>I certify that this application includes all required and relevant attachments.</p>	
	<p>I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.</p>	

**Transferee  
Certification**

Section	Question	Response
<b>General Certification Statements</b>	<p>Transferee certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Transferee further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.</p>	
	<p>The Transferee certifies that neither the Transferee nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1. 2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification § 1.2002 (c). The Transferee certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.</p>	

Authorized Party to Sign	<b>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</b> Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application. WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND /OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).	
	I certify that this application includes all required and relevant attachments.	
	I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.	<b>ROBERT J. FINOCCHIO, JR.</b> <i>CHAIRMAN, BOARD OF TRUSTEES</i>  07/16/2015

Transferor  
Certification

Section	Question	Response
General Certification Statements	Transferor certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Transferor further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.	
	The Transferor certifies that neither the Transferor nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1. 2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification § 1.2002 (c). The Transferor certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.	

Authorized Party to Sign	<p><b>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</b></p> <p>Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application.</p> <p>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND /OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).</p>	
	I certify that this application includes all required and relevant attachments.	
	I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.	<p><b>ROBERT J. FINOCCHIO, JR.</b>  <i>FORMER CHAIRMAN,  BOARD OF TRUSTEES</i></p> <p>07/16/2015</p>

Attachments

File Name	Uploaded By	Attachment Type	Description	Upload Status
<u>1683186_1311435.txt</u>	Applicant	All Purpose	ABSENCE OF WRITTEN AGREEMENT	Done with Virus Scan and/or Conversion
<u>1683186_1311436.txt</u>	Applicant	All Purpose	ABSENCE OF WRITTEN AGREEMENT	Done with Virus Scan and/or Conversion
<u>1683186_1311437.txt</u>	Applicant	All Purpose	MULTIPLE OWNERSHIP COMPLIANCE	Done with Virus Scan and/or Conversion