



Federal Communications Commission
Washington, D.C. 20554

September 12, 2012

In Reply Refer to:
1800B3-MFW

Urban Radio I, LLC, Debtor-in-Possession
c/o Tom W. Davidson, Esq.
Akin Gump Straus Hauer & Feld, LLP
1333 New Hampshire Avenue, N.W.
Washington, DC 20036

YMF Media New York Licensee LLC
c/o John M. Burgett, Esq.
Wiley Rein LLP
1776 K Street, N.W.
Washington, DC 20006

In re: **Applications for Commission Consent to
Voluntary Assignment of Licenses of Stations
Owned by Subsidiaries of Inner City Media
Corporation**

File Nos. BAL-20120430ADH
BAL-20120430ADJ
BAL-20120430ADO
BAL-20120430ADU

Petitions to Deny

Gentlemen:

We have before us: (1) the application for consent to Commission approval of the assignment of the licenses of the Stations listed in Appendix 1 (the "Stations"), from wholly owned subsidiaries of Inner City Media Corporation ("ICMC") to wholly owned subsidiaries of YMF Media, LLC (the "Applications"); (2) petitions to deny the Applications, filed by Messrs. Bob Law, Michael D. North, Ms. Betty Dopson, and New York City Councilman Charles Barron (the "Law Petitioners") on May 29, 2012 (the "Law Petition") and by Mr. Lloyd Douglas on June 4, 2012 (the "Douglas Petition"); and (3) related responsive pleadings.¹ For the reasons set forth below, we deny the Law and Douglas Petitions and grant the Applications.

¹ These include: (1) a June 4, 2012, Supplement to the Law Petition supplying subscription and verification pursuant to 47 C.F.R. § 1.52; (2) YMF's June 12, 2012, Opposition to the Law Petition; (3) Urban Radio's June 19, 2012, Opposition to the Douglas Petition; (4) the Law Petitioners' June 19, 2012, Reply; and (5) Douglas' July 24, 2012, Reply.

Additionally, on August 14, 2012, Douglas filed a Supplement to his Reply, attaching a copy of a complaint filed on August 13, 2012 with the United States Bankruptcy Court for the Southern District of New York concerning the alleged removal by YMF Media, LLC of 15 pieces of artwork from the offices of ICMC's corporate parent; it argues that the complaint reflects directly on the character qualifications of YMF Media, LLC. This pleading is unauthorized pursuant to 47 C.F.R. § 1.45. Moreover, the Commission will not consider in its character determination disputes that are the subject of litigation "absent an ultimate adjudication by an appropriate trier of fact, either by a government agency or court." *Policy Regarding Character Qualifications in Broadcast Licensing*, 102 FCC 2d 1179, 1205 ¶ 48 (1986), *recon. granted in part*, 1 FCC Rcd 421 (1986), *appeal dismissed sub nom.*, *National Association for Better Broadcasting v. FCC*, No. 86-1179 (D.C. Cir. Jun. 11, 1987). That pleading therefore will not be considered. However, as discussed below, our action here is without prejudice to any relief to which ICMC may ultimately be awarded by the Court.

Background. This case is the latest in a series of challenges by licensee debtors to the acquisition of radio stations by entities affiliated with or allegedly connected to Daniel B. Zwirn.² Here, in 2011, ICMC and its wholly-owned subsidiaries, defaulted on certain loan obligations. Certain lenders³ then filed involuntary petitions under Chapter 11 of the United States Bankruptcy Code on August 19, 2011, pursuant to which the United States Bankruptcy Court formally commenced Chapter 11 proceedings.⁴ Pursuant to this order, ICMC and its subsidiaries continued to own and operate the Stations as debtors-in-possession, and on September 28, 2011, the staff granted an unopposed *pro forma* application to assign the Stations from the various ICMC subsidiaries to those subsidiaries as debtors-in-possession pursuant to the Bankruptcy Court's order.⁵ On February 23, 2012, the Bankruptcy Court entered an order authorizing the sale of substantially all of the ICMC debtor's assets, including the Commission authorizations, to YMF or its designee.⁶

The Applications were filed on April 30, 2012. Each of the proposed assignees is a, wholly owned subsidiary of YMF Media, LLC.⁷ The Law Petitioners argue that: (1) grant of the Applications

² See, e.g., (1) *Shareholders of Stop 26 Riverbend, Inc.*, Memorandum Opinion and Order, 27 FCC Rcd 6516 (2012) (upholding staff approval of involuntary assignment to court-appointed "chief restructuring officer" and subsequent assignment to Zwirn-controlled Bernard Ohio, LLC, for five Ohio radio stations over the objections of Percy Squire); (2) *Tama Radio Licenses of Tampa Florida, Inc.*, Memorandum Opinion and Order, 25 FCC Rcd 7588 (2010), *appeal dismissed*, *Cherry v. FCC*, 541 F.3d 494 (D.C. Cir. 2011), *rehearing denied*, Case No. 10-1151 (D.C. Cir. Jun. 14, 2011) (upholding staff grant of assignment of the licenses of 10 Florida radio stations to a bankruptcy court-appointed trustee over the objections of Dr. Glenn Cherry) and *Letter to Percy Squire et al.* 24 FCC Rcd 10669 (MB 2009), *reconsideration denied*, *Letter to Percy Squire et al.*, Ref. 1800B3-ML (MB. Aug. 9, 2011), *application for review pending*, (approving assignment of several stations from receiver to Savannah Radio and Family Broadcasting, LLC over objection of Dr. Glenn Cherry); and (3) *KFCD(AM), Farmersville, Texas, KHSE(AM), Wylie, Texas*, Letter, 21 FCC Rcd 14996 (MB 2006), *reconsideration denied*, *KFCD(AM), Farmersville, Texas, KHSE(AM), Wylie, Texas*, Letter, 23 FCC Rcd 2646 (MB 2008), *application for review pending* (approving assignment of bankruptcy court-approved assignment of two Texas radio stations from DFW Radio License, LLC to Zwirn-controlled Bernard Dallas, LLC over the objection of David Schum and others) and *KFCD(AM), Farmersville, Texas, KHSE(AM), Wylie, Texas*, Letter, 23 FCC Rcd 2642 (MB 2008), *reconsideration denied*, *KFCD(AM), Farmersville, Texas, KHSE(AM), Wylie, Texas*, Letter, 24 FCC Rcd 5743 (MB 2008), *application for review pending* (approving assignment of the Texas stations' licenses from Bernard Dallas, LLC to Principle Broadcasting Network Dallas LLC over the objections of Schum and others). In fact, Messrs. Squire, Cherry, and Schum have supplied declarations in support of the Law Petition. See Law Petition at 32 (Declaration of Percy Squire that the information contained in the Law Petition is true "to the best of [his] information and belief"); Exhibit A (Declaration of Dr. Glenn Cherry); and Exhibit B (Declaration of David A. Schum).

³ Yucaipa Corporate Initiatives Fund II, L.P., Yucaipa Corporate Initiatives (Parallel) Fund II, L.P., CF ICBC LLC, Fortress Credit Funding I, L.P., and Drawbridge Special Opportunities Fund Ltd.

⁴ See *Inner City Media Corporation et al.*, Order for Relief in an Involuntary Case, Case No. 11-13967 (Bnkr. S.D.N.Y. Sep. 8, 2011).

⁵ See File Nos. BALH-20110915ABJ, BALH-20110915ABM, and BALH-20110915ACA, each granted on September 28, 2011.

⁶ See *Inner City Media Corporation et al.*, Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Fee and Clear of Liens, Claims, Encumbrances, and Other Interests, (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith, and (III) Granting Related Relief, Case No. 11-13967 (Bnkr. S.D.N.Y. Feb. 23, 2012).

⁷ YMF Media, LLC, is in turn wholly controlled by two members, Yucaipa Corporate Initiatives Fund II, L.P. and YCI II YMF Holdings, Inc. All YMF entities and subsidiaries ultimately are owned and controlled by Ronald W. Burkle. See Application, Exhibit 13.

“will result in an unlawful reduction of programming geared toward Black and local audiences”;⁸ and (2) grant of the application will promote further consolidation of media into the hands of “corporate elite.”⁹ They also argue that the transaction documents disclose that Fortress Investment Group (“Fortress”) has sufficient control over the assignee and the licenses now as to constitute an attributable interest, and Fortress lacks the qualifications to be a Commission licensee of the Stations. Specifically, the Law Petitioners allege that Fortress is in violation of the alien ownership restrictions set forth in Section 310(b) of the Communications Act of 1934, as amended (the “Act”); has prematurely assumed control of the Stations; has not been candid with the Commission about the degree of control it exercises over certain Ohio, Florida, and Texas stations;¹⁰ and has engaged in a pattern of predatory and racially discriminatory lending practices that has led to the demise of numerous locally and Black-owned stations. The Law Petitioners state that Fortress’ role here arises from its June 2009 replacement as manager of the now-defunct hedge funds of D.B. Zwirn & Co.; they argue that Fortress has actually, and without Commission approval, taken control of all former Zwirn stations and that Zwirn’s explanatory statements to the contrary are false.¹¹ The Law Petitioners also state that the stations are being operated by Fortress pursuant to a Local Marketing Agreement (“LMA”), which is being used as a pretext for Fortress’ usurpation of control of the Stations.¹²

In his Petition to Deny, Douglas, a shareholder in ICMC’s corporate parent, Inner City Broadcasting Corporation (“ICBC”), argues that the consent of ICBC shareholders to this transaction was obtained through fraud, misrepresentation, and deceit.¹³ He states that the decrease in Black ownership in the broadcast industry has been an ongoing problem for more than a decade, and the Application will “exacerbate an already critical situation.”¹⁴ He requests that the Commission require the buyers to describe the process through which they became the assignees in this proceeding, and the Commission should analyze the transaction to determine whether the public interest would be served by allowing the transaction to proceed.¹⁵

⁸ Petition at 1-2. The Law Petitioners state that, the reduction in Black-oriented programming engendered by the grant of the application, combined with the “systematic undercounting of Black audiences caused by Arbitron’s Portable People Meter (PPM), places Black radio at risk in New York City.” *Id.*

⁹ *Id.* at 2. The Law Petitioners state that this further consolidation of media, “when combined with the undemocratic impact of *Citizens United v. Federal Elections Commission*, 558 U.S. 30 (2010), threatens to undermine democracy and public ownership of the airways.

¹⁰ See n.2, *supra*.

¹¹ *Id.* at 12-13.

¹² *Id.* at 16-18.

¹³ Douglas Petition at 1-2. He states that, to resolve the Chapter 11 bankruptcy proceeding, representatives of YMF Media LLC and a company controlled by Earvin “Magic” Johnson (“Johnson”) represented to ICBC that present management would be retained and ICMC would be positioned to continue the long history of service to the Black community. Instead, Douglas writes, YMF and the Johnson group “engaged in a program to dismantle ICMC, terminate its management and staff, and sell off ICMC in pieces, including the sale of its New York Stations to Emmis Communications Corporation.” *Id.* at 2.

¹⁴ *Id.* at 5.

¹⁵ *Id.* at 4-5.

In its Opposition to the Law Petition, YMF argues that the Petition is procedurally defective¹⁶ and “replete with unsupported and superfluous” allegations. It contends that the only claim that might relate to the Application – that Fortress holds an attributable interest in YMF – is unsupported by the facts. Fortress, it claims, does not hold an attributable interest in YMF¹⁷ and is not operating the Stations under the LMA. It argues that the bulk of the Law Petitioners’ allegations “amounts to a recycling of assertions in unrelated cases that have already been specifically reviewed and rejected by the Commission and the Media Bureau on multiple occasions.”¹⁸

In its Opposition to the Douglas Petition, Urban Radio D.I.P. argues that the Commission is not the appropriate forum to challenge decisions by the Bankruptcy Court and therefore the staff should dismiss or deny that pleading. It also argues that Douglas has provided no factual support for his allegations, and it claims that grant of the Application would further the public interest by facilitating the sale of the Stations to a third party, enabling the Stations to continue as going concerns free of the constraints associated with the bankruptcy process.

Discussion. Procedural Issues. YMF is correct that the Law Petition was not properly filed with the Office of the Secretary. Under Section 1.7 of the Rules,¹⁹ pleadings and other documents are considered to be filed with the Commission upon their receipt at the location designated by the Commission. For broadcast applications, the designated location for paper-filed petitions is the Office of the Secretary at 445 12th Street, S.W., Washington, DC 20554.²⁰ However, the Law Petition was served on the parties to the Application pursuant to Section 1.47 of the Rules,²¹ and YMF responded to the substantive arguments presented in the Petition. Accordingly, although we will not waive the requirement that paper pleadings regarding broadcast applications be filed with the Office of the Secretary, we will consider the merits of the Law Petition.

Douglas, as a resident of New York City, has standing to file a Petition to Deny the New York Applications,²² and his pleading will be treated as such.

¹⁶ YMF states that petitions to deny the Applications must be filed with the Office of the Secretary. YMF Opposition at 1 n.1. YMF argues that the Law Petition’s date stamp indicates that it was filed directly with the Media Bureau and not with the Office of the Secretary. It also argues that, with respect to the applications other than those involving New York Stations, the Law Petitioners have not demonstrated standing to challenge the Applications. YMF Opposition at 2 n.3. Similarly, Urban Radio argues that Douglas lacks standing to file a petition to deny because he is but a minority stockholder in ICBC and does not allege a direct injury that will result from grant of the Applications.

¹⁷ YMF Opposition at 2, 4. YMF states that Fortress will hold warrants entitling the holders to purchase membership units in YMF; such warrants, it states, are not attributable until exercised, citing 47 C.F.R. § 73.3555, note 2(e). Fortress affiliates also will, on a going-forward basis, have the right to nominate replacements for two of YMF’s five board members in certain circumstances. These limited nomination rights, YMF argues, do not render it an attributable interestholder in YMF, citing, *Paxson Management Corp.*, Memorandum Opinion and Order, 22 FCC Rcd 22224, 22232 (2007) (“*Paxson*”).

¹⁸ YMF Opposition at 3.

¹⁹ 47 C.F.R. § 1.7.

²⁰ See, e.g., *FCC Announces Change in Filing Location for Paper Documents*, Public Notice, 24 FCC Rcd 14312 (OMD 2009).

²¹ 47 C.F.R. § 1.47.

²² See, e.g., *Annabelle Savage, Chapter 7 Trustee*, Letter, 25 FCC Rcd 3665, 3667 (MB 2010), citing *Sagittarius Broadcasting Corp.*, Memorandum Opinion and Order, 18 FCC Rcd 22551, 22554-5 (2003) and *CHET-5 Broadcasting of Poughkeepsie, Inc.*, Memorandum Opinion and Order, 14 FCC Rcd 13041 (1999) (“the Commission accords party in interest status to a petitioner who demonstrates . . . that he resides in the service area of the station that is the subject of the petition”)

Substantive Matters. Section 310(d) of the Act²³ requires the Commission to determine whether the proposed transfer or assignment of a broadcast license would be in the public interest. Pursuant to Sections 309(d) of the Act,²⁴ petitions to deny must provide properly supported allegations of fact that, if true, would establish a substantial and material question of fact calling for further inquiry regarding whether grant of the Assignment Application would be *prima facie* inconsistent with Section 309(a) of the Act.²⁵ This section provides that we are to grant an application if, upon consideration of the application and pleadings and other such matters of which we may officially take notice, we find that the public interest, convenience, and necessity will be served by the granting of such application. If, however, the applicant fails to meet that standard, the Commission may deny the application after notice and opportunity for a hearing under Section 309(e) of the Act. Under this standard, when reviewed on their merits, the Law and Douglas Petitions fail.

To the extent that the Law Petition makes allegations concerning the conduct of Fortress and entities controlled by D.B. Zwirn in prior transactions, those allegations have been considered and rejected, and will not be revisited here.²⁶ Additionally, notwithstanding the Law Petitioners' contrary protestations, we find that Fortress does not hold an attributable interest in YMF. Although Fortress investors will hold warrants entitling them to acquire membership interests in YMF and will in the future be able to nominate replacement directors for YMF's board, those rights do not confer on Fortress a present attributable interest in YMF.²⁷ Similarly, although Fortress investors do have certain investor protection rights,²⁸ the Commission has previously held that requirements for investor consent to such "fundamental matters" are permissible investor protections that neither restrict a corporation's discretion nor rise to the level of attributable influence.²⁹

With respect to the argument that Fortress has engaged in an unauthorized assumption of control of the Stations by virtue of the LMA, we note initially that neither Fortress nor any of its investors is a signatory to the LMA³⁰ and, as discussed above, Fortress does not have an attributable interest in YMF or

²³ 47 U.S.C. § 310(d).

²⁴ 47 U.S.C. § 309(e).

²⁵ *Id.* § 309(a). See, e.g., *WWOR-TV, Inc.*, Memorandum Opinion and Order, 6 FCC Rcd 193, 197 n.10 (1990), *aff'd sub nom. Garden State Broadcasting L.P. v. FCC*, 996 F.2d 386 (D.C. Cir. 1993), *rehearing denied* (Sept. 10, 1993); *Area Christian Television, Inc.*, Memorandum Opinion and Order, 60 RR 2d 862, 864 (1986) (informal objections, like petitions to deny, must contain adequate and specific factual allegations sufficient to warrant the relief requested).

²⁶ To the extent that there remain pending applications for review in the Florida and Texas cases, the full Commission will have the opportunity to consider those allegations.

²⁷ See n. 14, *supra*. Fortress' board nomination right *per se* does not necessarily result in attribution, as that nomination right does not ensure that Fortress' nominees will be elected to the board. *Paxson*, 22 FCC Rcd at 22232. We caution YMF here, as did the Commission in *Paxson*, that future directors of YMF may not be Fortress "employees or agents but [must be] persons who would reasonably be expected to act independently in all future matters." *Id.*

²⁸ These include the rights in certain circumstances to approve: (i) any sale or merger of YMF Media or all or substantially all of its assets; (ii) any change to the LLC Agreement that adversely alters or impacts the rights, preferences, or privileges of the Fortress investors; and (iii) any change to the size, composition, or powers of the board of Managers of YMF or any of its subsidiaries. Application, Exhibit 13, at n.5.

²⁹ See, e.g., *Hispanic Broadcasting Corp.*, Memorandum Opinion and Order, 18 FCC Rcd 18834, 18841 (2003); *Shareholders of AMFM, Inc.*, Memorandum Opinion and Order, 15 FCC Rcd 16062, 16078 (2000); *Roy M. Speer*, Memorandum Opinion and Order, 11 FCC Rcd 14147, 14155, 14158 (1996).

³⁰ The LMA is between Inner City Media Corporation and YMF Media, LLC, and is expressly subject to approval by the Bankruptcy Court. See Application, Exhibit 5, "Form of Local Marketing Agreement."

its subsidiaries. Accordingly, we find that the argument that Fortress has assumed control of the Stations pursuant to the LMA therefore is without merit. Additionally, the Commission has consistently held that the existence of an LMA or time brokerage agreement does not constitute a *per se* transfer of control,³¹ and the LMA here comports with Commission policy. Section 1.7, for example, provides for complete licensee control of the Stations, including Station operations and “compliance with all applicable FCC Rules.” Section 1.5 provides for meaningful licensee management and staff presence at the Stations’ studios, and Section 1.6 provides for direct licensee payment of the Stations’ expenses. We find that the record provides no evidence that the terms of the LMA authorize anything other than appropriate broker involvement with the Stations.

With respect to the allegations of the Law Petitioners and Douglas that grant of the Application will result in an unlawful reduction of programming geared toward Black and local audiences and will result in the further decline in the number of Black-owned radio stations, Section 310(d) of the Act specifically prohibits the Commission from considering any entity other than the assignee proposed in the application before it.³² Moreover, the Commission does not take potential changes in programming formats into consideration in reviewing assignment applications. In 1976, the Commission issued a *Policy Statement* in which it concluded that review of program formats was not required by the Act, would not benefit the public, would deter innovation, and would impose substantial administrative burdens on the Commission.³³ The Supreme Court of the United States has upheld this policy and the Commission’s determination that a change in programming is not a material factor in acting on applications for license transfer.³⁴ Additionally, regarding the argument in the Law Petition that grant of the application would lead to further consolidation in the broadcast industry, we have reviewed the Application and find that it complies with the Commission’s local radio ownership rules,³⁵ nothing further is required here.

Finally, with respect to Douglas’ allegation that the consent of ICBC shareholders to this transaction “was obtained through fraud, misrepresentation, and deceit,” the Commission has consistently held that it is not the proper forum for resolving a private contractual dispute. ICBC shareholders who believe that they have been dealt with unlawfully in negotiations should instead seek redress in courts of competent jurisdiction, including the Bankruptcy Court in this proceeding.³⁶ We note, however, that Commission grant of an assignment application merely finds that the parties are qualified under, and the proposed transaction does not violate, the Act, the Rules or Commission policies. As such, it is permissive only and does not prejudice any relief to which the parties may ultimately be entitled.³⁷

³¹ See, e.g., *Hilo Broadcasting, LLC*, Letter, 20 FCC Rcd 13582, 13587 (MB 2005), citing *Solar Broadcasting Company, Inc.*, Memorandum Opinion and Order, 17 FCC Rcd 5467, 5486 (2002), and *Roy R. Russo, Esq.*, Letter, 5 FCC Rcd 7586 (MMB 1990).

³² See 47 U.S.C. § 310(d) (when acting on assignment or transfer applications, the Commission may not consider whether the public interest, convenience and necessity might be served by assignment or transfer of the license to an entity other than the proposed assignee or transferee).

³³ See *Changes in the Entertainment Formats of Broadcast Stations*, Memorandum Opinion and Order, 60 FCC 2d 858, 865-66 (1976), *recon. denied*, Memorandum Opinion and Order, 66 FCC 2d 78 (1977), *rev'd sub nom. WNCN Listeners Guild v. FCC*, 610 F.2d 838 (D.C. Cir. 1979), *rev'd*, 450 U.S. 582 (1981).

³⁴ *FCC v. WNCN Listener's Guild*, 450 U.S. 582, 585 (1981).

³⁵ See 47 C.F.R. § 73.3555(a)(1).

³⁶ See, e.g., *Decatur Telecasting, Inc.*, 7 FCC Rcd 8622, 8624 (1992); *John R. Runner, Receiver*, 36 RR2d 773, 778 (1976);

³⁷ See *Letter to Geraldine R. Miller and George R. Borsari, Jr.*, 24 FCC Rcd 11814, 11815 (MB 2009).

Conclusion/Actions. Based on the evidence presented in the record, we find that neither the Law Petition nor the Douglas Petition has raised a substantial and material question of fact warranting further inquiry. We have examined the Applications and find that they otherwise comply with all applicable statutory and regulatory requirements, and we find that grant of the Applications would further the public interest, convenience, and necessity.

Accordingly, IT IS ORDERED, that the petitions to deny filed by Messrs. Bob Law, Michael D. North, Ms. Betty Dopson, and New York City Councilman Charles Barron on May 29, 2012, and by Mr. Lloyd Douglas on June 4, 2012, ARE DENIED.

IT IS FURTHER ORDERED that the applications listed in Appendix 1 to this Letter ARE GRANTED.

Sincerely,



Peter H. Doyle
Chief, Audio Division
Media Bureau

cc: Petitioners listed in Appendix 2

**APPENDIX 1
STATIONS INVOLVED IN THIS TRANSACTION**

**URBAN RADIO I, L.L.C. DEBTOR-IN-POSESSION TO YMF MEDIA NEW YORK LICENSEE,
LLC (the "New York Applications")**

WLIB(AM), New York, NY

Facility ID No. 28204

WBLS(FM), New York, NY

Facility ID No. 28203

File No. BAL-20120430ADH

**URBAN RADIO II, L.L.C. DEBTOR-IN-POSESSION TO YMF MEDIA SOUTH CAROLINA
LICENSEE, LLC**

WOIC(AM), Columbia, SC

Facility ID No. 73370

WHXT(FM), Orangeburg, SC

Facility ID No. 50522

WWDM(FM), Sumter, SC

Facility ID No. 58398

WMFX(FM), St. Andrews, SC

Facility ID No. 19471

WARQ(FM), Columbia, SC

Facility ID No. 54800

File No. BAL-20120430ADJ

**URBAN RADIO II, L.L.C. DEBTOR-IN-POSESSION TO YMF MEDIA MISSISSIPPI
LICENSEE, LLC**

WJNT(AM), Pearl, MS

Facility ID No. 7691

WOAD(AM), Jackson, MS

Facility ID No. 50404

WJQS(AM), Jackson, MS

Facility ID No. 50409

WZNO(FM), Pickens, MS

Facility ID No. 29512

WMMI(FM), Jackson, MS

Facility ID No. 50408

WKXI-FM, Magee, MS

Facility ID No. 50407

File No. BAL-20120430ADO

**URBAN RADIO III, L.L.C. DEBTOR-IN-POSESSION TO YMF MEDIA CALIFORNIA
LICENSEE, LLC**

KVTO(AM), Berkeley, CA

Facility ID No. 28681

KVVN(AM), Santa Clara, CA

Facility ID No. 28438

File No. BAL-20120430ADU

APPENDIX 2

Mr. Bob Law
14 Greentree Circle
Westbury, NY 11590

Ms. Betty Dopson
13505 Rockaway Blvd.
South Ozone Park, NY 11420

Mr. Michael D. North
13635 219th Street
Laurelton, NY 11413

Hon. Charles Barron
New York City District 42
718 Pennsylvania Avenue
Brooklyn, NY 11207

Mr. Lloyd Douglas
165 West 127th Street, Suite 2J
New York, NY 20027