

## David Snavelly

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**From:** Stephen Svab  
**Sent:** Friday, May 04, 2018 4:26 PM  
**To:** Michael Wagner  
**Cc:** Karen Workeman; Son Nguyen; Huong Chau; David Snavelly; Robin Lott  
**Subject:** RE: Immaculate Heart Media - Applications to Change AM Stations to Commercial Status

Mike and everyone:

I have confirmed Denbo's MO showing below that WCNZ(AM); WVOI(AM) and WMYR(AM) are all located within the Ft. Myers-Naples, FL, Nielsen radio market. In a market of 39 stations, a licensee may own up to seven stations, not more than 4 in the same service, so Denbo's client is in compliance. I gave this review number: DN-098-18 (for your records).

Regarding station WWCA(AM) in Gary, IN, there is no Nielsen market for Gary, IN; hence, Denbo's statement below is incorrect. Rather, WWCA(AM) is located within the 136-station Chicago, IL, Nielsen market. In Chicago, Denbo's client owns WWCA(AM); WNTD(AM); and has an LMA with WCPT(AM). In a market of more than 45 stations, a licensee may own up to 8 stations, not more than 5 in the same service, so Denbo's client is in compliance. I gave this review number: DN-099-18.

Thanks.

Steve

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**From:** Michael Wagner  
**Sent:** Monday, April 30, 2018 10:17 AM  
**To:** Mark Denbo <mdenbo@fccworld.com>  
**Cc:** Karen Workeman <Karen.Workeman@fcc.gov>; Son Nguyen <Son.Nguyen@fcc.gov>; Huong Chau <Huong.Chau@fcc.gov>; Stephen Svab <Stephen.Svab@fcc.gov>; David Snavelly <David.Snavelly@fcc.gov>; Robin Lott <Robin.Lott@fcc.gov>  
**Subject:** RE: Immaculate Heart Media - Applications to Change AM Stations to Commercial Status

We will, Mark. You bet.

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**From:** Mark Denbo [mailto:[mdenbo@fccworld.com](mailto:mdenbo@fccworld.com)]  
**Sent:** Monday, April 30, 2018 10:10 AM  
**To:** Michael Wagner <[Michael.Wagner@fcc.gov](mailto:Michael.Wagner@fcc.gov)>  
**Cc:** Karen Workeman <[Karen.Workeman@fcc.gov](mailto:Karen.Workeman@fcc.gov)>; Son Nguyen <[Son.Nguyen@fcc.gov](mailto:Son.Nguyen@fcc.gov)>; Huong Chau <[Huong.Chau@fcc.gov](mailto:Huong.Chau@fcc.gov)>; Stephen Svab <[Stephen.Svab@fcc.gov](mailto:Stephen.Svab@fcc.gov)>; David Snavelly <[David.Snavelly@fcc.gov](mailto:David.Snavelly@fcc.gov)>; Robin Lott <[Robin.Lott@fcc.gov](mailto:Robin.Lott@fcc.gov)>  
**Subject:** RE: Immaculate Heart Media - Applications to Change AM Stations to Commercial Status

Good morning Michael. It appears as if many of these applications have been granted. Thank you. There are a few from "Batch 1" – KHJ (BML-20180216AAR), KJOP (BML-20180216AAS), KSFB (BML-20180216AAU), and KWG (BML-20180216ABD) that remain pending. Can anyone please provide an update with respect to those four applications?

With respect to "Batch 2," one of the five applications has been granted. Thanks again. With respect to the pending application for WVOI (BML-20180403ABG), I note that the name of the licensee apparently was entered incorrectly into CDBS. The name of the applicant should be "Immaculate Heart Media, Inc." It appears as if the name of the prior licensee was inadvertently entered into CDBS. When the application is granted, I ask that the name of the current licensee be listed on the license itself.

Again, thanks to all for your work on these applications. Please let me know if there is anything else that you need from me in order to complete your processing of any of the pending "Batch 1" or "Batch 2" applications.

- Mark

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**From:** Mark Denbo [<mailto:mdenbo@fccworld.com>]  
**Sent:** Wednesday, April 18, 2018 3:58 PM  
**To:** 'Michael Wagner' <[Michael.Wagner@fcc.gov](mailto:Michael.Wagner@fcc.gov)>  
**Cc:** 'Karen Workeman' <[Karen.Workeman@fcc.gov](mailto:Karen.Workeman@fcc.gov)>; 'Son Nguyen' <[Son.Nguyen@fcc.gov](mailto:Son.Nguyen@fcc.gov)>; 'Huong Chau' <[Huong.Chau@fcc.gov](mailto:Huong.Chau@fcc.gov)>; 'Stephen Svab' <[Stephen.Svab@fcc.gov](mailto:Stephen.Svab@fcc.gov)>  
**Subject:** RE: Immaculate Heart Media - Applications to Change AM Stations to Commercial Status

Thank you Michael. Attached is a revised "Batch 1" document, reflecting that there are now a total of five applications (of the first 17) that have been granted. Talk to you soon!

- Mark

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**From:** Michael Wagner [<mailto:Michael.Wagner@fcc.gov>]  
**Sent:** Wednesday, April 18, 2018 3:39 PM  
**To:** Mark Denbo <[mdenbo@fccworld.com](mailto:mdenbo@fccworld.com)>  
**Cc:** Karen Workeman <[Karen.Workeman@fcc.gov](mailto:Karen.Workeman@fcc.gov)>; Son Nguyen <[Son.Nguyen@fcc.gov](mailto:Son.Nguyen@fcc.gov)>; Huong Chau <[Huong.Chau@fcc.gov](mailto:Huong.Chau@fcc.gov)>; Stephen Svab <[Stephen.Svab@fcc.gov](mailto:Stephen.Svab@fcc.gov)>  
**Subject:** RE: Immaculate Heart Media - Applications to Change AM Stations to Commercial Status

This is beautiful. Thank you very much, Mark. Karen tells me that several of the 17 already have been granted.



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**From:** Mark Denbo [<mailto:mdenbo@fccworld.com>]

**Sent:** Wednesday, April 18, 2018 3:10 PM

**To:** Michael Wagner <[Michael.Wagner@fcc.gov](mailto:Michael.Wagner@fcc.gov)>

**Cc:** Karen Workeman <[Karen.Workeman@fcc.gov](mailto:Karen.Workeman@fcc.gov)>; Son Nguyen <[Son.Nguyen@fcc.gov](mailto:Son.Nguyen@fcc.gov)>; Huong Chau <[Huong.Chau@fcc.gov](mailto:Huong.Chau@fcc.gov)>; Stephen Svab <[Stephen.Svab@fcc.gov](mailto:Stephen.Svab@fcc.gov)>

**Subject:** Immaculate Heart Media - Applications to Change AM Stations to Commercial Status

Michael, attached are two documents. The first document is a listing of seventeen (17) applications for AM station license modification that were filed by Immaculate Heart Media, Inc. on February 16, 2018, requesting that the status of those AM stations be changed from "noncommercial educational" to "commercial." With respect to each of the first seventeen (17) applications that were filed, there are no multiple ownership issues because, in each case, when the applications are granted, Immaculate Heart Media, Inc. will be the licensee of just one commercial station in a given market.

The second document is a listing of five (5) applications for AM station license modification that were filed by Immaculate Heart Media, Inc. on April 3, 2018, requesting that the status of those AM stations be changed from "noncommercial educational" to "commercial." With respect to this second group of applications, the multiple ownership rules are triggered with respect to three (3) of them: WCNZ(AM), Marco Island, FL, WVOI(AM), Marco Island, FL, and WMYR(AM), Ft. Myers, FL. Those three stations are part of the Ft. Myers, FL Nielsen Metro. Immaculate Heart Media, Inc. (formerly known as Starboard Media Foundation, Inc.) acquired the three stations in September 2016, pursuant to File Nos. BAL-20160728AEJ and BAL-20160728AEL. At the time, the stations were licensed as commercial AM stations; accordingly, a BIA Report (attached) was included with both applications. The Report indicates that there were 39 stations in the market as of July 2016, meaning the common ownership of three of them is permitted under Section 73.3555(a) of the Commission's rules.

The multiple ownership rules are not triggered with respect to the applications associated with the other two applications that were filed on April 3 (WMJR, Nicholasville, KY or WWCA, Gary, IN) because, when the applications are granted, Immaculate Heart Media, Inc. will be the licensee of just one commercial station in each station's market.

Please contact me with any questions regarding this matter.

- Mark

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