

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
FISHER BROADCASTING –)	File No.: EB-08-IH-1203
SEATTLE RADIO, L.L.C.)	Acct. No.: 201232080021
)	FRN: 0005848080
Licensee of Station KVI(AM),)	Facility ID No.: 35853
Seattle, Washington)	

ORDER

Adopted: May 24, 2012

Released: May 25, 2012

By the Chief, Enforcement Bureau:

1. In this Order, we adopt the attached Consent Decree entered into between the Enforcement Bureau (Bureau) and Fisher Broadcasting – Seattle Radio, L.L.C. (Licensee). The Consent Decree terminates an investigation by the Bureau against the Licensee for possible violations of Section 508 of the Communications Act of 1934, as amended (Act),¹ and Section 73.1216 of the Commission's rules (Rules),² in connection with a licensee-conducted contest broadcast by the Licensee on Station KVI(AM), Seattle, Washington (Station) in 2007.

2. The Bureau and the Licensee have negotiated the terms of the Consent Decree that resolve this matter. A copy of the Consent Decree is attached hereto and incorporated by reference.

3. After reviewing the terms of the Consent Decree and evaluating the facts before us, we find that the public interest would be served by adopting the Consent Decree and terminating the investigation.

4. In the absence of material new evidence relating to this matter, we conclude that our investigation raises no substantial or material questions of fact as to whether the Licensee possesses the basic qualifications, including those related to character, to hold or obtain any Commission license or authorization.

5. Accordingly, **IT IS ORDERED** that, pursuant to Section 4(i) of the Act,³ and Sections 0.111 and 0.311 of the Rules,⁴ the Consent Decree attached to this Order **IS ADOPTED**.

6. **IT IS FURTHER ORDERED** that the above-captioned investigation, as to the Station and/or the Licensee, **IS TERMINATED**.

¹ See 47 U.S.C. § 509 (titled "Prohibited Practices in Case of Contests of Intellectual Knowledge, Intellectual Skill, or Chance").

² See 47 C.F.R. § 73.1216 (titled "Licensee-Conducted Contests").

³ See 47 U.S.C. § 154(i).

⁴ See 47 C.F.R. §§ 0.111, 0.311.

7. **IT IS FURTHER ORDERED** that any third-party complaints and allegations against the Station and/or the Licensee before the Enforcement Bureau related to the above-captioned investigation as of the date of this Consent Decree **ARE DISMISSED**.

8. **IT IS FURTHER ORDERED** that a copy of this Order and Consent Decree shall be sent by both First Class mail and Certified Mail, Return Receipt Requested, to Licensee's counsel, Clifford M. Harrington, Esq., Pillsbury Winthrop Shaw Pittman LLP, 2300 N Street, N.W., Washington, D.C. 20037-1128.

FEDERAL COMMUNICATIONS COMMISSION

P. Michele Ellison
Chief, Enforcement Bureau

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FISHER BROADCASTING –)	File No.: EB-08-IH-1203
SEATTLE RADIO, L.L.C.)	Acct. No.: 201232080021
)	FRN: 0005848080
Licensee of Station KVI(AM),)	Facility ID No.: 35853
Seattle, Washington)	

CONSENT DECREE

1. The Enforcement Bureau of the Federal Communications Commission and Fisher Broadcasting – Seattle Radio, L.L.C., by their authorized representatives, hereby enter into this Consent Decree for the purpose of terminating the Bureau’s investigation into possible violations of Section 508 of the Communications Act of 1934, as amended,⁵ and Section 73.1216 of the Commission’s rules,⁶ pertaining to Licensee-Conducted contests.

I. DEFINITIONS

2. For the purposes of this Consent Decree, the following definitions shall apply:
- (a) “Act” means the Communications Act of 1934, as amended, 47 U.S.C. § 151 *et seq.*
 - (b) “Adopting Order” means an order of the Bureau adopting the terms of this Consent Decree without change, addition, deletion, or modification.
 - (c) “Bureau” means the Enforcement Bureau of the Federal Communications Commission.
 - (d) “Commission” and “FCC” mean the Federal Communications Commission and all of its bureaus and offices.
 - (e) “Communications Laws” means, collectively, the Act, the Rules, and the published and promulgated orders and decisions of the Commission to which Fisher is subject by virtue of it being a Commission licensee, including but not limited to Section 508 of the Act and Section 73.1216 of the Commission’s rules.
 - (f) “Compliance Plan” means the compliance obligations, program, and procedures described in this Consent Decree at paragraph 10.
 - (g) “Covered Employees” means all employees and agents of Fisher who perform, or supervise, oversee, or manage the performance of, duties that relate to Fisher’s responsibilities under Section 508 of the Act and the Licensee-Conducted Contest Rule.

⁵ See 47 U.S.C. § 509.

⁶ See 47 C.F.R. § 73.1216.

- (h) "Effective Date" means the date on which the Commission releases the Adopting Order.
- (i) "Investigation" means the investigation commenced by the Bureau in response to Fisher's April 18, 2008, letter to the Commission regarding Fisher's "Secret Listener Salute" contest.
- (j) "Fisher" means Fisher Broadcasting – Seattle Radio, L.L.C. and its predecessors-in-interest and successors-in-interest.
- (k) "Licensee-Conducted Contest Rule" means Section 73.1216 of the Rules, 47 C.F.R. § 73.1216, governing how Commission licensees conduct contests that are broadcast or advertised.
- (l) "Operating Procedures" means the standard, internal operating procedures and compliance policies established by Fisher to implement the Compliance Plan.
- (m) "Parties" means Fisher and the Bureau, each of which is a "Party."
- (n) "Rules" means the Commission's regulations found in Title 47 of the Code of Federal Regulations.
- (o) "Section 508" means Section 508 of the Communications Act of 1934, as amended, which prohibits a licensee from knowingly deceiving the public by engaging "in any artifice or scheme for the purpose of prearranging or predetermining in whole or in part the outcome of a purportedly bona fide contest . . . [of] chance." 47 U.S.C. § 509(a)(3). In addition, Section 508 also prohibits: (1) the production for broadcast of a contest of chance wherein the person has reasonable ground for believing that the contest outcome has been predetermined; and (2) conspiring with any other person or persons to violate the statute. 47 U.S.C. §§ 509(a)(4)-(5).
- (p) "Station" means radio Station KVI(AM), Seattle, Washington (Facility ID No. 35853).

II. BACKGROUND

2. Section 508 of the Act prohibits a licensee from knowingly deceiving the public by engaging "in any artifice or scheme for the purpose of prearranging or predetermining in whole or in part the outcome of a purportedly bona fide contest . . . [of] chance."⁷ Under Section 73.1216 of the Rules, a broadcast licensee "that broadcasts or advertises information about a contest it conducts shall fully and accurately disclose the material terms of the contest, and shall conduct the contest substantially as announced or advertised. No contest description shall be false, misleading or deceptive with respect to any material term."⁸ Material terms, among other things, include any eligibility restrictions, means of selection of winners, and the extent, nature, and value of prizes.⁹

⁷ 47 U.S.C. § 509(a)(3). Section 508 also prohibits: (1) the production for broadcast of a contest of chance wherein the person has reasonable ground for believing that the contest outcome has been predetermined; (2) conspiring with any other person or persons to violate the statute. 47 U.S.C. §§ 509(a)(4)-(5).

⁸ 47 C.F.R. § 73.1216.

⁹ See *id.*, Notes 1(b), 2.

3. On April 18, 2008, Fisher, through its Counsel, filed a letter with the Commission regarding its own Contest, called the "Secret Listener Salute" that aired on Station KVI(AM) between February 6, 2007, and March 30, 2007.¹⁰ The Licensee asserts that, as part of an internal year end audit in 2008, it discovered that a former employee may have taken actions to manipulate the outcome of the Contest by placing the names of suspected friends and acquaintances on the list of names to be announced on air, thus making them potential winners.¹¹ Fisher indicates that winnings may have been shared between the former employee and the winners.¹² Fisher states that it discovered this problem after the employee left Fisher's employ, and that Fisher subsequently contacted the Seattle Police Department.¹³ On June 24, 2008, the Bureau sent a letter to Fisher regarding the Contest,¹⁴ and Fisher responded on July 30, 2008.¹⁵ The Bureau subsequently sent a second letter to Fisher on May 7, 2010,¹⁶ to which Fisher responded on June 3, 2010.¹⁷ Fisher contends that it was unaware of the former employee's actions until after she had left the Station's employ, that it was an unwitting victim in this situation, and that it alerted the Commission and law enforcement once it determined what had happened.¹⁸ Fisher contends that the actions of the former employee violated the Station's Code of Conduct and Conflict of Interest Policies that were in place at the time the alleged violations occurred.¹⁹ Fisher claims that it will create added oversight to all future contests and monitor their implementation to safeguard against any future manipulations by any party.²⁰ The terms of this Consent Decree reflect the Bureau's consideration of the Licensee's self-disclosure of this matter and the Licensee's prior history of compliance with Commission rules.

¹⁰ See Letter from Clifford M. Harrington, Esq., Pillsbury Winthrop Shaw Pittman LLP, Counsel for Fisher Broadcasting – Seattle Radio, L.L.C. (Counsel) to Hillary S. DeNigro, Chief, Investigations and Hearings Division, FCC Enforcement Bureau (April 18, 2008) (on file in EB-08-IH-1203) (Fisher April 18 Letter).

¹¹ *Id.* at 1.

¹² *Id.*

¹³ *Id.*

¹⁴ See Letter from Kenneth M. Scheibel, Jr., Assistant Chief, Investigations and Hearings Division, FCC Enforcement Bureau, to Counsel (June 24, 2008) (on file in EB-08-IH-1203).

¹⁵ See Letter from Counsel to Marlene Dortch, Secretary, Federal Communications Commission (July 30, 2008) (on file in EB-08-IH-1203) (Fisher July 30 Letter).

¹⁶ See Letter from Anjali K. Singh, Acting Assistant Chief, Investigations and Hearings Division, FCC Enforcement Bureau, to Counsel (May 7, 2010) (on file in EB-08-IH-1203).

¹⁷ See Letter from Counsel to Marlene Dortch, Secretary, Federal Communications Commission (June 3, 2010) (on file in EB-08-IH-1203).

¹⁸ See Fisher April 18 Letter at 1. According to court records, Ms. Ryan Keeley, Fisher's former Promotions Coordinator at the Station, was convicted by a King County, Washington, court and ordered to pay \$14,000 in restitution after pleading guilty to second-degree theft for her role in the Contest. *Washington v. Keeley, et al.*, No. 10C-00364-5 SEA (King Cnty. Sup. Ct. 2010). Keeley pled guilty to violating RCW 9A.56.040(1)(a) and 9A.56.020(1)(b) of the Revised Washington criminal code. See also Jennifer Sullivan, *KVI Ex-employee Sentenced for Rigging Radio Contest*, Seattle Times online edition, July 30, 2010, http://seattletimes.nwsources.com/html/localnews/2012494429_riggedcontest31m.html (last visited Sept. 16, 2011).

¹⁹ See Fisher July 30 Letter at 16-17.

²⁰ See Fisher April 18 Letter at 1-2.

III. TERMS OF AGREEMENT

4. **Adopting Order.** The Parties agree that the provisions of this Consent Decree shall be subject to final approval by the Bureau by incorporation of such provisions by reference in the Adopting Order.

5. **Jurisdiction.** Fisher agrees that the Bureau has jurisdiction over it and the matters contained in this Consent Decree and that the Bureau has the authority to enter into and adopt this Consent Decree.

6. **Effective Date; Violations.** The Parties agree that this Consent Decree shall become effective on the Effective Date as defined herein. As of the Effective Date, the Adopting Order and this Consent Decree shall have the same force and effect as any other order of the Commission. Any violation of the Adopting Order or of the terms of this Consent Decree shall constitute a separate violation of a Commission order, entitling the Commission to exercise any rights and remedies attendant to the enforcement of a Commission order.

7. **Termination of Investigation.** In express reliance on the covenants and representations in this Consent Decree and to avoid further expenditure of public resources, the Bureau agrees to terminate the Investigation. In consideration for the termination of the Investigation, Fisher agrees to the terms, conditions, and procedures contained herein. The Bureau further agrees that in the absence of new material evidence, the Bureau will not use the facts developed in this Investigation through the Effective Date, or the existence of this Consent Decree, to institute on its own motion any new proceeding, formal or informal, or take any action on its own motion against Fisher concerning the matters that were the subject of the Investigation. The Bureau also agrees that in the absence of new material evidence it will not use the facts developed in the Investigation through the Effective Date, or the existence of this Consent Decree, to institute on its own motion any proceeding, formal or informal, or take any action on its own motion against Fisher with respect to Fisher's basic qualifications, including its character qualifications, to be a Commission licensee or to hold Commission licenses or authorizations.

8. **Compliance Officer.** Within thirty (30) calendar days after the Effective Date, Fisher shall designate a senior corporate manager with the requisite corporate and organizational authority to serve as Compliance Officer and to discharge the duties set forth below. The person designated as the Compliance Officer shall be responsible for developing, implementing, and administering the Compliance Plan and ensuring that Fisher complies with the terms and conditions of the Compliance Plan and this Consent Decree. In addition to the general knowledge of the Communications Laws necessary to discharge his/her duties under this Consent Decree, the Compliance Officer shall have specific knowledge of Section 508 of the Act and the Licensee-Conducted Contest Rule prior to assuming his/her duties.

9. **Compliance Plan.** For purposes of settling the matters set forth herein, Fisher agrees that it shall, within sixty (60) calendar days of the Effective Date, develop and implement a Compliance Plan designed to ensure future compliance with the Communications Laws, including Section 508 of the Act and Section 73.1216 of the Commission's rules, and with the terms and conditions of this Consent Decree. The Compliance Plan shall include, without limitation, the following components:

a. **Operating Procedures for Licensee-Conducted Contests.** Within sixty (60) calendar days after the Effective Date, Fisher shall establish Operating Procedures that all Covered Employees must follow to help ensure Fisher's compliance with Section 508 of the Act and the Licensee-Conducted Contest Rule. Fisher's Operating Procedures shall include internal procedures and policies specifically designed to ensure that the outcomes of Fisher's Licensee-Conducted contests are not predetermined or prearranged, in violation of Section 508 of the Act, and that Fisher fully and accurately discloses the material terms of its contests, and conducts the contests substantially as announced or advertised, consistent with Section 73.1216 of the Commission's rules. Fisher also shall develop a Compliance Checklist that describes the steps

that a Covered Employee must follow to ensure that Licensee-Conducted contests will not result in a violation of the Commission's Laws regarding Licensee-Conducted contests. At a minimum, the Compliance Checklist shall require at all times that at least two station employees, one of which shall be a management-level employee, be involved in all aspects of the selection of winners and the award of prizes to participants in Licensee-Conducted contests.

b. **Compliance Manual.** Within sixty (60) calendar days after the Effective Date, the Compliance Officer shall develop and distribute a Compliance Manual to all Covered Employees. The Compliance Manual shall explain Section 508 of the Act and the Licensee-Conducted Contest Rule, and set forth the Operating Procedures that Covered Employees shall follow to help ensure Fisher's compliance with the Communications Laws. Fisher shall periodically review and revise the Compliance Manual as necessary to ensure that the information set forth therein remains current and complete. Fisher shall distribute any revisions to the Compliance Manual promptly to all Covered Employees.

c. **Compliance Training Program.** Fisher shall establish and implement a Compliance Training Program on compliance with Section 508 of the Act, the Licensee-Conducted Contest Rule and the Operating Procedures. As part of the Compliance Training Program, Covered Employees shall be advised of Fisher's obligation to report any noncompliance with Section 508 of the Act or the Licensee-Conducted Contest Rule under paragraph 11 of this Consent Decree and shall be instructed on how to disclose noncompliance to the Compliance Officer. All Covered Employees shall be trained pursuant to the Compliance Training Program within ninety (90) calendar days after the Effective Date, except that any person who becomes a Covered Employee at any time after the Effective Date shall be trained within thirty (30) calendar days after the date such person becomes a Covered Employee. Fisher shall repeat the compliance training on an annual basis, and shall periodically review and revise the Compliance Training Program as necessary to ensure that it remains current and complete and to enhance its effectiveness.

10. **Reporting Noncompliance.** Fisher shall report any noncompliance with Section 508 of the Act, the Licensee-Conducted Contest Rule, and with the terms and conditions of this Consent Decree within thirty (30) calendar days after discovery of such noncompliance. Such reports shall include a detailed explanation of (i) each instance of noncompliance; (ii) the steps that Fisher has taken or will take to remedy such noncompliance; (iii) the schedule on which such remedial actions will be taken; and (iv) the steps that Fisher has taken or will take to prevent the recurrence of any such noncompliance. All reports of noncompliance shall be submitted to the Chief, Investigations and Hearings Division, Enforcement Bureau, Federal Communications Commission, Room 4-C330, 445 12th Street, S.W., Washington, D.C. 20554, with a copy submitted electronically to Theresa Z. Cavanaugh at Terry.Cavanaugh@fcc.gov, Jeffrey J. Gee at Jeffrey.Gee@fcc.gov, Kenneth M. Scheibel, Jr. at Kenneth.Scheibel@fcc.gov, and to Amelia Brown at Amelia.Brown@fcc.gov. The reporting obligations set forth in this paragraph 11 shall expire thirty-six (36) months after the Effective Date.

11. **Compliance Reports.** Fisher shall file Compliance Reports with the Commission ninety (90) days after the Effective Date, twelve (12) months after the Effective Date, twenty-four (24) months after the Effective Date, and thirty six (36) months after the Effective Date.

a. Each compliance report shall include a detailed description of Fisher's efforts during the relevant period to comply with the terms and conditions of this Consent Decree, Section 508 of the Act, and the Licensee-Conducted Contest Rule. In addition, each Compliance Report shall include a certification by the Compliance Officer, as an agent of and on behalf of Fisher, stating that the Compliance Officer has personal knowledge that Fisher (i) has established and implemented the Compliance Plan; (ii) has utilized the Operating Procedures since the implementation of the Compliance Plan; and (iii) is not aware of any instances of noncompliance

with the terms and conditions of this Consent Decree, including the reporting obligations set forth in paragraph 11 hereof.

b. The Compliance Officer's certification shall be accompanied by a statement explaining the basis for such certification and must comply with Section 1.16 of the Rules²¹ and be subscribed to as true under penalty of perjury in substantially the form set forth therein.

c. If the Compliance Officer cannot provide the requisite certification, the Compliance Officer, as an agent of and on behalf of Fisher, shall provide the Commission with a detailed explanation of the reason(s) why and describe fully: (i) each instance of noncompliance; (ii) the steps that Fisher has taken or will take to remedy such noncompliance, including the schedule on which proposed remedial action will be taken; and (iii) the steps that Fisher has taken or will take to prevent the recurrence of any such noncompliance, including the schedule on which such preventive action will be taken.

d. All Compliance Reports shall be submitted to the Chief, Investigations and Hearings Division, Enforcement Bureau, Federal Communications Commission, Room 4-C330, 445 12th Street, S.W., Washington, D.C. 20554, with a copy submitted electronically to Theresa Z. Cavanaugh at Terry.Cavanaugh@fcc.gov, Jeffrey J. Gee at Jeffrey.Gee@fcc.gov, Kenneth M. Scheibel, Jr. at Kenneth.Scheibel@fcc.gov, and to Amelia Brown at Amelia.Brown@fcc.gov.

12. **Termination Date.** Unless stated otherwise, the requirements set forth in paragraphs 9 through 12 of this Consent Decree shall expire thirty-six (36) months after the Effective Date.

13. **Section 508 and Section 73.1216 Complaints; Subsequent Investigations.** Nothing in this Consent Decree shall prevent the Commission or its delegated authority from adjudicating complaints filed pursuant to Section 508 of the Act or Section 73.1216 of the Commission's rules against Fisher or its affiliates for alleged violations of the Act or the Commission's rules or for any other type of alleged misconduct, regardless of when such misconduct took place. The Commission's adjudication of any such complaints will be based solely on the record developed in that proceeding. Except as expressly provided in this Consent Decree, this Consent Decree shall not prevent the Commission from investigating new evidence of noncompliance by Fisher with the Communications Laws.

14. **Voluntary Contribution.** Fisher agrees that it will make a voluntary contribution to the United States Treasury in the amount of seven thousand dollars (\$7,000). The payment must be made within thirty (30) days after the Effective Date. The payment must be made by check or similar instrument, payable to the order of the Federal Communications Commission. The payment must include the Account Number and FRN referenced in the caption to the Adopting Order. Payment by check or money order may be mailed to Federal Communications Commission, P.O. Box 979088, St. Louis, MO 63197-9000. Payment by overnight mail may be sent to U.S. Bank – Government Lockbox #979088, SL-MO-C2-GL, 1005 Convention Plaza, St. Louis, MO 63101. Payment by wire transfer may be made to ABA Number 021030004, receiving bank TREAS/NYC, and Account Number 27000001. Payment by credit card may be made by submitting credit card account information and an authorized signature on FCC Form 159 (Remittance Advice). Regardless of the form of payment, a completed FCC Form 159 must be submitted at the time of payment. When completing the FCC Form 159, enter the Account Number in block number 23A (call sign/other ID), and enter the letters "FORF" in block number 24A (payment type code). Fisher shall also send electronic notification to Theresa Z. Cavanaugh at Terry.Cavanaugh@fcc.gov, Jeffrey J. Gee at Jeffrey.Gee@fcc.gov, Kenneth M. Scheibel, Jr. at Kenneth.Scheibel@fcc.gov, and to Amelia Brown at Amelia.Brown@fcc.gov on the date said payment is made.

²¹ 47 C.F.R. § 1.16

15. **Waivers.** Fisher waives any and all rights it may have to seek administrative or judicial reconsideration, review, appeal or stay, or to otherwise challenge or contest the validity of this Consent Decree and the Adopting Order, provided the Bureau issues an Adopting Order as defined herein. Fisher shall retain the right to challenge Commission interpretation of the Consent Decree or any terms contained herein. If either Party (or the United States on behalf of the Commission) brings a judicial action to enforce the terms of the Adopting Order, neither Fisher nor the Commission shall contest the validity of the Consent Decree or the Adopting Order, and Fisher shall waive any statutory right to a trial *de novo*. Fisher hereby agrees to waive any claims it may have under the Equal Access to Justice Act, 5 U.S.C. § 504 and 47 C.F.R. § 1.1501 *et seq.*, relating to the matters addressed in this Consent Decree.

16. **Liability.** Fisher admits, solely for the purpose of this Consent Decree and for Commission civil enforcement purposes, and in express reliance on the provisions of paragraph 8 hereof, that the broadcast material at issue in this Consent Decree is in violation of 47 U.S.C. § 509 and 47 C.F.R. § 73.1216, assuming construction of these terms as they are construed by the Bureau as of the date hereof. Notwithstanding any other provision of this Consent Decree, it is expressly agreed and understood that if this Consent Decree, or paragraph 8 hereof, or both, are breached by the Bureau, or are invalidated or modified to Fisher's prejudice by the Commission, Bureau, or any court, then and in that event the provisions of the immediately-preceding sentence shall be of no force or effect whatever, and Fisher shall not, by virtue of that sentence or any other provision of this Consent Decree, be deemed to have made any admission concerning violations of 47 U.S.C. § 509 or 47 C.F.R. § 73.1216.

17. **Invalidity.** In the event that this Consent Decree in its entirety is rendered invalid by any court of competent jurisdiction, it shall become null and void and may not be used in any manner in any legal proceeding.

18. **Subsequent Rule or Order.** The Parties agree that if any provision of the Consent Decree conflicts with any subsequent rule or order adopted by the Commission (except an order specifically intended to revise the terms of this Consent Decree to which Fisher does not expressly consent) that provision will be superseded by such rule or Commission order.

19. **Successors and Assigns.** Fisher agrees that the provisions of this Consent Decree shall be binding on its successors, assigns, and transferees.

20. **Final Settlement.** The Parties agree and acknowledge that this Consent Decree shall constitute a final settlement between the Parties with respect to the Investigation.

21. **Modifications.** This Consent Decree cannot be modified without the advance written consent of both Parties.

22. **Paragraph Headings.** The headings of the paragraphs in this Consent Decree are inserted for convenience only and are not intended to affect the meaning or interpretation of this Consent Decree.

23. **Authorized Representative.** The individual signing this Consent Decree on behalf of Fisher represents and warrants that he is authorized by Fisher to execute this Consent Decree and to bind Fisher to the obligations set forth herein. The FCC signatory represents that she is signing this Consent Decree in her official capacity and that she is authorized to execute this Consent Decree.

24. **Counterparts.** This Consent Decree may be signed in any number of counterparts (including by facsimile), each of which, when executed and delivered, shall be an original, and all of which counterparts together shall constitute one and the same fully executed instrument.

P. Michele Ellison
Chief
Enforcement Bureau

Date

Robert I. Dunlop
Executive Vice President Operations
Fisher Broadcasting – Seattle Radio, L.L.C.

Date