

**PUBLIC INTEREST STATEMENT
AND DESCRIPTION OF TRANSACTION**

Satellite earth stations E020134 and E050378 are licensed to Citadel Broadcasting Company (“CB Company”) and currently used in connection with broadcast radio stations in Little Rock, Arkansas, and in Lansing, Michigan, respectively, to facilitate broadcasts to the public. On December 20, 2009, Citadel Broadcasting Corporation (“Citadel”) and the subsidiaries of Citadel that hold broadcast licenses (the “Citadel Licensee Subsidiaries” and together with Citadel, the “Debtors”), including CB Company, filed voluntary petitions for bankruptcy seeking relief under the provisions of Chapter 11 of the Bankruptcy Code to effectuate a restructuring of the debt obligations of the Debtors with the United States Bankruptcy Court of the Southern District of New York (“Bankruptcy Court”). Accordingly, the Debtors are now operating as debtors-in-possession under the Bankruptcy Court’s oversight.

CB Company filed on December 22, 2009 an application on FCC Form 316 requesting FCC consent to the involuntary, *pro forma* assignment of its broadcast radio station licenses to CB Company as “debtor-in-possession” under Chapter 11. That application was granted on December 30, 2009. *See* FCC File Nos. BAL-20091222ABU-AJX.

Upon the filing of the Chapter 11 Joint Plan of Reorganization (the “Plan”), as modified, with the Bankruptcy Court, applications were filed on FCC Form 315 on March 18, 2010, requesting Commission consent to the transfer of control of the broadcast radio station licenses held by Citadel’s licensee subsidiaries (the “Citadel Licensee Subsidiaries”), including CB Company, Debtor-in-Possession, from the existing shareholders of Citadel to the shareholders of CB Company, as Reorganized (the surviving company after the reorganization described in the Plan). *See* FCC File Nos. BTC-20100318ABL-AJO. Those applications remain pending.

Due to inadvertent oversight, this interim application seeking Commission consent to the *pro forma* assignment of the licenses of satellite earth stations E020134 and E050378 to CB Company, Debtor-in-Possession, was not timely filed, and leave to submit this application at this time is respectfully requested. This assignment does not effect a substantial change in the control of the licensee, as the officers and directors of Citadel and the Citadel Licensee Subsidiaries remained unchanged following the filing of the bankruptcy petitions. The control structure of Citadel and the Citadel Licensee Subsidiaries remains unchanged but is now subject to the jurisdiction and oversight of the Bankruptcy Court. In short, the attributable ownership interests in Citadel are substantively unchanged from those last approved by the Commission in *Citadel Broadcasting Co. and The Walt Disney Co. (Transfer of Control)*, Memorandum Opinion and Order and Notice of Apparent Liability, 22 FCC Rcd 7083 (2007). Accordingly, the contemplated assignment is *pro forma* in nature.

Approval of this *pro forma* assignment application will allow CB Company, Debtor-in-Possession to continue to operate satellite earth stations E020134 and E050378 to facilitate its broadcasts to the public. It is therefore respectfully submitted that the grant of this application will serve the public interest, convenience and necessity.

Expedited approval of this *pro forma* assignment application is respectfully requested. CB Company, Debtor-in-Possession, plans to subsequently file an assignment application to assign the licenses for satellite earth stations E020134 and E050378 from Citadel Broadcasting Company, Debtor-in-Possession to Radio License Holding CBC, LLC, the licensee subsidiary that will ultimately hold the CB Company FCC licenses upon approval of the Plan by the Bankruptcy Court and emergence from bankruptcy.