

EXPLANATORY STATEMENT

Radio Networks, LLC (“*Radio Networks*”) hereby requests special temporary authority (“*STA*”) to operate an existing temporary fixed-satellite earth station (Call Sign E940197) in advance of FCC action on its pending application for assignment of the earth station authorization from Radio Networks, LLC, Debtor-in-Possession (“*Radio Networks DIP*”) to Radio Networks, LLC. The Assignment Application was filed on April 7, 2010 (FCC File No. SES-ASG-INTR2010-01098); however, the FCC did not issue public notice of the application and as a result, the application is still pending.

Radio Networks DIP is a wholly-owned subsidiary of Citadel Broadcasting Corporation, Debtor-in-Possession (“*Citadel*”). On December 20, 2009, Citadel, together with its subsidiaries, filed voluntary petitions (“*Petitions*”) in the United States Bankruptcy Court of the Southern District of New York (“*Bankruptcy Court*”) seeking relief under the provisions of chapter 11 of the Bankruptcy Code to effectuate a pre-negotiated restructuring of its debt obligations. On May 17, 2010 the Bankruptcy Court confirmed the Second Modified Joint Plan of Reorganization. Citadel plans to emerge from bankruptcy as soon as possible. The Commission has already granted its consent to transfer of control of Citadel’s 228 radio station licenses from Citadel to Citadel Broadcasting Corporation (as Reorganized) (“*Reorganized Citadel*”). Upon emergence from bankruptcy, RLH Networks will be an indirect, wholly-owned subsidiary of Reorganized Citadel. The Commission has already had an opportunity to review and approve Reorganized Citadel’s qualifications to operate FCC-licensed facilities, and there is no need for delay in granting it permission to operate an additional facility on a temporary basis.

Moreover, Radio Networks has a near term need to operate the earth stations to transmit news and information programming. Accordingly, Radio Networks seeks expedited grant of an STA to permit it to proceed with its plans. It respectfully requests that action on this STA application be completed by Friday, May 28, 2010, if possible. Radio Networks anticipates that the underlying assignment application will be granted during the effective period of the requested STA. *See* 47 C.F.R. § 25.120(b).