

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

	:	
UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	Civil Action No. 1:98CV02763
	:	
v.	:	(Judge Kollar-Kotelly)
	:	
CHANCELLOR MEDIA	:	Filed: 4/6/99
CORPORATION	:	
	:	
and	:	
	:	
KUNZ & COMPANY,	:	
	:	
Defendants.	:	
	:	

**CERTIFICATE OF COMPLIANCE WITH PROVISIONS  
OF THE ANTITRUST PROCEDURES AND PENALTIES ACT**

Plaintiff, the United States of America, hereby certifies that, in compliance with the Antitrust Procedures and Penalties Act, 15 U.S.C. §§ 16(b) - (h) (the "APPA"), the following procedures have been followed in preparation for entry of a final judgment herein:

1. A proposed Final Judgment, and a Stipulation and Order by which the parties have agreed to the Court's entry of the proposed Final Judgment following compliance with the APPA, were filed with the Court in this matter on November 12, 1998. A Competitive Impact Statement was filed with the Court in this matter on November 17, 1998.

2. Pursuant to 15 U.S.C. § 16(b), the proposed Final Judgment and Competitive Impact Statement were published in the Federal Register on December 3, 1998, 63 Fed. Reg. 66820.

3. Pursuant to 15 U.S.C. § 16(c), a summary of the terms of the proposed Final Judgment and the Competitive Impact Statement were published in the Washington Post, a newspaper of general circulation in the district in which this case has been filed and a newspaper of general circulation in the District of Columbia, during the period

November 27 through December 3, 1998. In addition, pursuant to the Court's Order of November 25, 1998, a supplementary notice was published for three days in the following counties and publications:

- (a) Kern County, California -- The Bakersfield Californian  
December 18 through December 23, 1998
- (b) Kings County, California -- Fresno Bee  
November 27 through December 2, 1998
- (c) Inyo County, California -- Inyo Register  
November 27 through December 3, 1998
- (d) Mohave County, Arizona -- Mohave Valley Daily News  
November 27 through December 2, 1998

4. Defendants have complied with the requirements of 15 U.S.C. § 16(g).

5. Pursuant to 15 U.S.C. §§ 16(b) and (d), the sixty-day comment period for the receipt and consideration of written comments, during which the proposed Final Judgment could not be entered, terminated on February 23, 1999. No comments were received during this period, and no comments have been received as of the date of this Certification of Compliance.

6. Pursuant to the Stipulation filed on November 12, 1998, and 15 U.S.C. § 16(e), the Court may enter the Final Judgment after it determines that the Judgment serves the public interest.

7. The Competitive Impact Statement filed on November 17, 1998 demonstrates that the proposed Final Judgment satisfies the public interest standard of 15 U.S.C. § 16(e).

8. The United States requests that this Court enter the Final Judgment, and is authorized to state that defendants join in this request.

Dated: April 6, 1999

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Barry L. Creech (D.C. Bar # -- 421070)  
U.S. Department of Justice  
Antitrust Division  
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Attorney for Plaintiff the United States

**Certificate of Service**

I, Barry L. Creech, hereby certify that, on April \_\_\_\_, 1999 I caused the foregoing document to be served on defendants Kunz & Company and Chancellor Media Corporation by having a copy mailed, first- class, postage prepaid, to:

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Bruce J. Prager  
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1001 Pennsylvania Ave., NW  
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Barry L. Creech  
D.C. Bar No. -- 421070