

July 11, 2003

Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Applications for Transfer of Control of Hispanic Broadcasting Corp., and Certain Subsidiaries, Licensees of KGBT-AM, Harlingen, Texas et al. (Docket No. MB 02-235, FCC File Nos. BTC20020723ABL, et al)

Dear Ms. Dortch:

Raul Alarcon, the chief executive officer of Spanish Broadcasting System, has asked me to address the question of whether, in my experience and that of my company, Emmis Communications Corporation, English language radio stations compete with Spanish language radio stations. I understand that this issue is part of the FCC's consideration of the merits of Univision Communications' proposed acquisition of Hispanic Broadcasting Corp.

It is clear to me that English language and Spanish language radio stations do not generally compete with each other. My response is predicated upon more than twenty-five years of experience in the radio business as chief executive of Emmis. Today, Emmis owns and operates twenty-seven radio stations, including properties in New York, Los Angeles, Chicago, Phoenix and Austin --all of which have significant Hispanic populations. Although Emmis' foundation is the radio business, today it also owns and operates television stations and magazines in numerous communities throughout the United States.

The basis for my conclusion that English and Spanish language stations do not generally compete is straightforward. Even though there is minor overlap in terms of audience between Emmis stations and Spanish language stations, we do not consider the Spanish stations' rate cards in establishing our sales prices. The prices they charge simply do not have any influence on the advertising markets in which we operate. Additionally, my experience is that for most advertisers the ad budgets are separate, i.e., general market (English language) ad budgets are not regularly expended on Spanish

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language media (neither are Spanish ad budgets typically available for English language stations).

I hope that you find this information useful.

Respectfully Submitted,

/s/

Jeffrey H. Smulyan,
Chairman and Chief Executive Officer

cc: Chairman Michael K. Powell
Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Kevin J. Martin
Commissioner Jonathan S. Adelstein
Susan M. Eid
Stacy R. Robinson
Jordan B. Goldstein
Catherine Crutcher Bohigian
Johanna Mikes
W. Kenneth Ferree
Robert Ratcliffe
David Brown
Scott R. Flick, Counsel for Univision Communications, Inc.
Roy R. Russo, Counsel for Hispanic Broadcasting Corp.
Harry F. Cole, Counsel for Elgin FM Limited Partnership
Arthur V. Belendiuk, Counsel for National Hispanic Policy Institute, Inc.
Bruce A. Eisen, Counsel for Spanish Broadcasting System