

EXHIBIT 15
FCC Form 314
Section III, Question 6(b)

Multiple Ownership Compliance

A. TRANSACTION OVERVIEW

The instant application and six companion Form 314 applications seek FCC consent to assign the licenses of the 35 full-power television stations, operating in 25 television markets (“DMAs”) across the county, which currently are licensed to subsidiaries of Clear Channel Communications, Inc. (“Clear Channel TV Stations”), to TV Acquisition LLC (“TVA” or “Assignee”).¹ As detailed in Assignee Exhibits 11 and 13, TVA is wholly owned by certain commonly-controlled affiliates of Providence Equity Partners Inc. (“PEP”), and certain principals of PEP, through commonly-controlled investment funds, indirectly have attributable noncontrolling interests in entities with media interests in certain of the Clear Channel TV Station markets.²

¹ A separate Form 314 is being submitted for each of the following Clear Channel licensee subsidiaries (collectively, the “TVA Applications”): Ackerley Broadcasting Operations, LLC; Clear Channel Broadcasting Licenses, Inc.; Ackerley Broadcasting - Fresno, LLC; CCB Texas Licenses, L.P.; Citicasters Co.; Central NY News, Inc.; and Capstar TX Limited Partnership.

² The pertinent interests of these PEP principals are (i) a 19% interest in Univision Communications Inc. (“Univision”), (ii) a 16% interest in Freedom Communications Holdings, Inc. (“Freedom”), and (iii) a 33.3% interest in Bustos Media, LLC (“Bustos Media”). (Pursuant to *Shareholders of Hispanic Broadcasting Corporation*, 18 FCC Rcd 18834 (2003), Univision is “deemed” to hold an attributable interest in certain TV stations owned by Entravision Holdings, LLC (“Entravision”) if the Entravision station is affiliated with a Univision Network and Univision has the right to approve the sale of the station.) Exhibit 13 contains a complete listing of the attributable radio and television station interests of the Assignee parties to this application.

Following the acquisition of the Clear Channel TV Stations, certain of these existing PEP interests would result in nonconforming combinations under the TV duopoly rule and/or the radio-television cross ownership rule in eight markets. In one other market (the Jacksonville, Florida, DMA) the existing Clear Channel duopoly may not be assigned intact to Assignee under the duopoly rule because of a recent change in station rankings. In each instance, the TVA Applications demonstrate that the public interest would be served, as part of this large, multi-station, multi-market transaction, by grant of a temporary 6-month waiver in order to permit a short period of time following consummation of the transaction for the Assignee parties to complete the steps necessary to achieve compliance with the multiple ownership restrictions in an orderly manner — maintaining throughout the limited waiver period the existing substantial diversity of media voices in the pertinent markets. In each instance, the parties will achieve compliance either by divesting a nonconforming television station or by divesting or converting an existing attributable interest into a non-attributable interest in a manner consistent with the Commission's attribution guidelines and the multiple ownership rules.

The affected markets are the following:

1. Bakersfield, California DMA
2. Monterey-Salinas, California DMA
3. San Francisco-Oakland-San Jose, California DMA
4. Santa Barbara-Santa Maria-San Luis Obispo, California DMA
5. Salt Lake City, Utah DMA
6. Albany-Schenectady-Troy, New York DMA
7. Jacksonville, Florida DMA
8. Fresno-Visalia, California DMA
9. San Antonio, Texas DMA

TVA also demonstrates that common ownership of KTCW(TV), Roseburg, Oregon, and KMTR(TV), Eugene, Oregon complies with Section 73.3555(b) of the Rules

because the Grade B contours of the stations, taking into account terrain, do not overlap.

Alternatively, the public interest would be served by reauthorizing KTCW(TV)'s satellite status.

Further, TVA shows that "good cause" exists, under Section 73.1125 of the Rules, to permit

KOCW(TV), Hoisington, Kansas, and KAAS-TV, Salina, Kansas, both of which have long

rebroadcast the programming of parent station KSAS-TV, Wichita, Kansas, to the outlying rural

areas of the geographically expansive Wichita-Hutchinson DMA, to share the KSAS-TV main

studio.

**B. TVA APPLICATION FOR CONSENT TO ASSIGNMENT OF
LICENSES OF CLEAR CHANNEL TV STATIONS LICENSED TO
CENTRAL NY NEWS, INC.**

TVA's proposed acquisition of the four stations licensed to Clear Channel's subsidiary Central NY News, Inc. (WHAM-TV, Rochester, New York; WSYR-TV, Syracuse, New York; WIVT(TV), Binghamton, New York; and WWTI(TV), Watertown, New York) complies with the multiple ownership requirements of Section 73.3555.