

**Exhibit 15**  
**Satellite Waiver Request**

The instant application seeks Commission consent to the assignment of the FCC licenses for television station WBIJ(TV), Crandon, Wisconsin (the "Station") from Selenka Communications, LLC ("Assignor") to WAOW-WYOW Television, Inc. ("Assignee"). Assignee also owns and operates television stations WAOW-TV, Wausau, Wisconsin ("WAOW") and WYOW-TV, Eagle River, Wisconsin ("WYOW"). WYOW is a satellite of WAOW. WAOW, WYOW and the Station are licensed to communities located in the Wausau-Rhineland, Wisconsin Designated Market Area ("DMA"). Assignee hereby requests a waiver of Section 73.3555(b)(i) of the Commission's rules to allow Assignee to operate the Station as a satellite of WAOW, pursuant to Note 5 of Section 73.3555 of the Commission's rules.

The Commission's satellite policy provides that an applicant for satellite status is entitled to a presumption that the proposed satellite operations are in the public interest if the applicant meets the following criteria: (1) there is no City Grade contour overlap between the parent and satellite; (2) the proposed satellite station would provide service to an unserved or underserved area; and (3) no alternative operator is ready and able to construct or to purchase and operate the satellite as a full service station.<sup>1</sup>

The first criterion is met because there is no City Grade contour overlap between WAOW and the Station. Attached hereto as Attachment A is a Technical Statement in Support of an Application for Satellite Station Status (the "Technical Statement") prepared by D. Scott Turpie of Lohnes and Culver. The Technical Statement includes a contour map and it demonstrates that there is no City Grade overlap between WAOW and the Station.<sup>2</sup>

The second criterion can be satisfied by either of two different tests. Under the "transmission test," a proposed satellite community of license is considered "underserved" if two or fewer full-service television stations (including commercial, noncommercial and satellite stations) are licensed to it.<sup>3</sup> As described in the Technical Statement, the Station is the only full-power television station licensed to Crandon, Wisconsin. Accordingly, under the "transmission test," the Station provides service to an underserved area and the second criterion is satisfied.

The third criterion involves a showing that no alternative operator is ready and able to operate the proposed satellite as a full-service, stand-alone station. Attached

---

<sup>1</sup> *Television Satellite Stations Review of Policy and Rules ("Satellite Policy")*, 6 FCC Rcd 4212, 4213-15 (1991).

<sup>2</sup> The Station intends to continue analog service beyond February 17, 2009, while WAOW intends to terminate analog service on February 17.

<sup>3</sup> See *Satellite Policy* at 4215.

hereto as Attachment B is a letter from Brian N. Byrnes, President of Paramount Media Advisors, Inc. (the "Paramount Letter") which describes the unsuccessful efforts that were made to sell the Station. As set forth in the Paramount Letter, only one other potential purchaser expressed any interest in purchasing the Station and this potential buyer declined to proceed after an inspection visit to the Station. As described in the Paramount Letter, the Station is not an attractive investment for several reasons including the small size and low revenue of the market, the lack of available programming and the need for additional capital expenditures to improve the Station's technical facilities. Assignee submits that the Paramount Letter satisfies the third criterion for the Commission's presumptive satellite waiver analysis.

In conclusion, Assignee has demonstrated that this request for satellite status for the Station satisfies all three criteria of the Commission's presumptive satellite waiver test and that grant of this waiver request would serve the public interest. Based upon the foregoing, Assignee respectfully requests a waiver of the local television ownership rules, pursuant to the Note 5 of Section 73.3555 of the Commission's rules, to permit Assignee to acquire the Station and to operate it as a satellite of WAOW.

## **Attachment A**

Technical Statement by Lohnes and Culver

**TECHNICAL STATEMENT  
IN SUPPORT OF AN APPLICATION  
FOR SATELLITE STATION STATUS**

**INTRODUCTION**

This statement was prepared on behalf of WAOW-WYOW Television, Inc., ("WAOW-WYOW"), licensee of WAOW-TV, analog Channel 9, Wausau, Wisconsin (FIN 64546), in support of an application requesting television satellite status for WBIJ, analog Channel 4, Crandon, Wisconsin (FIN 81503). WAOW-WYOW proposes that operation of WBIJ as a satellite of WAOW-TV, under common ownership, is presumptively in the public interest pursuant to the Commission's policy on television satellite stations. The technical showing supplied herein establishes that WBIJ and WAOW-TV do not involve overlapping City Grade service areas and that WBIJ is currently serving an underserved area.

**TECHNICAL SHOWING**

The proposed satellite and parent station are not predicted to transmit a City Grade quality signal to the same areas. A map exhibit demonstrating no overlapping of the City Grade service contours is attached as Figure 1. The contour plots shown in Figure 1 correspond to the following analog TV authorizations and operating parameters:

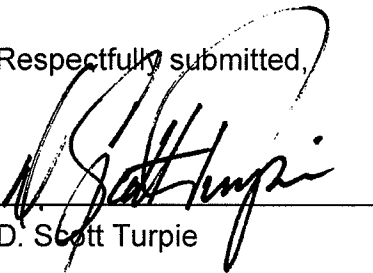
**Table 1**

| Call    | FCC Authorization | Channel | ERP (kW) | HAAT (m) | Latitude | Longitude |
|---------|-------------------|---------|----------|----------|----------|-----------|
| WBIJ    | BLCT-20030812AAQ  | 4       | 4.3      | 119      | 45-34-23 | 88-52-57  |
| WAOW-TV | BLCT-20011009ADH  | 9       | 316      | 368      | 44-55-14 | 89-41-28  |

The precise locations of the contours shown in Figure 1 were computed using the standard prediction methodology outlined in 47 C.F.R. Section 73.684.

It has been determined that the proposed satellite provides service to an underserved area using the Commission's "transmission test" approach described in the *Report and Order* in MM Docket No. 87-8, FCC 91-182, Paragraph 19. Specifically, this approach qualifies the principal community of license as being underserved if there are no more than two full-service stations licensed to serve it. In view of the fact that the Television Table of Allotments, CDBS Public Access, and FCC engineering television database all confirm that there are no other full-service educational, regular television, or designated satellite stations already licensed to serve the community of Crandon, WBIJ is identified as being licensed to a community that is underserved.

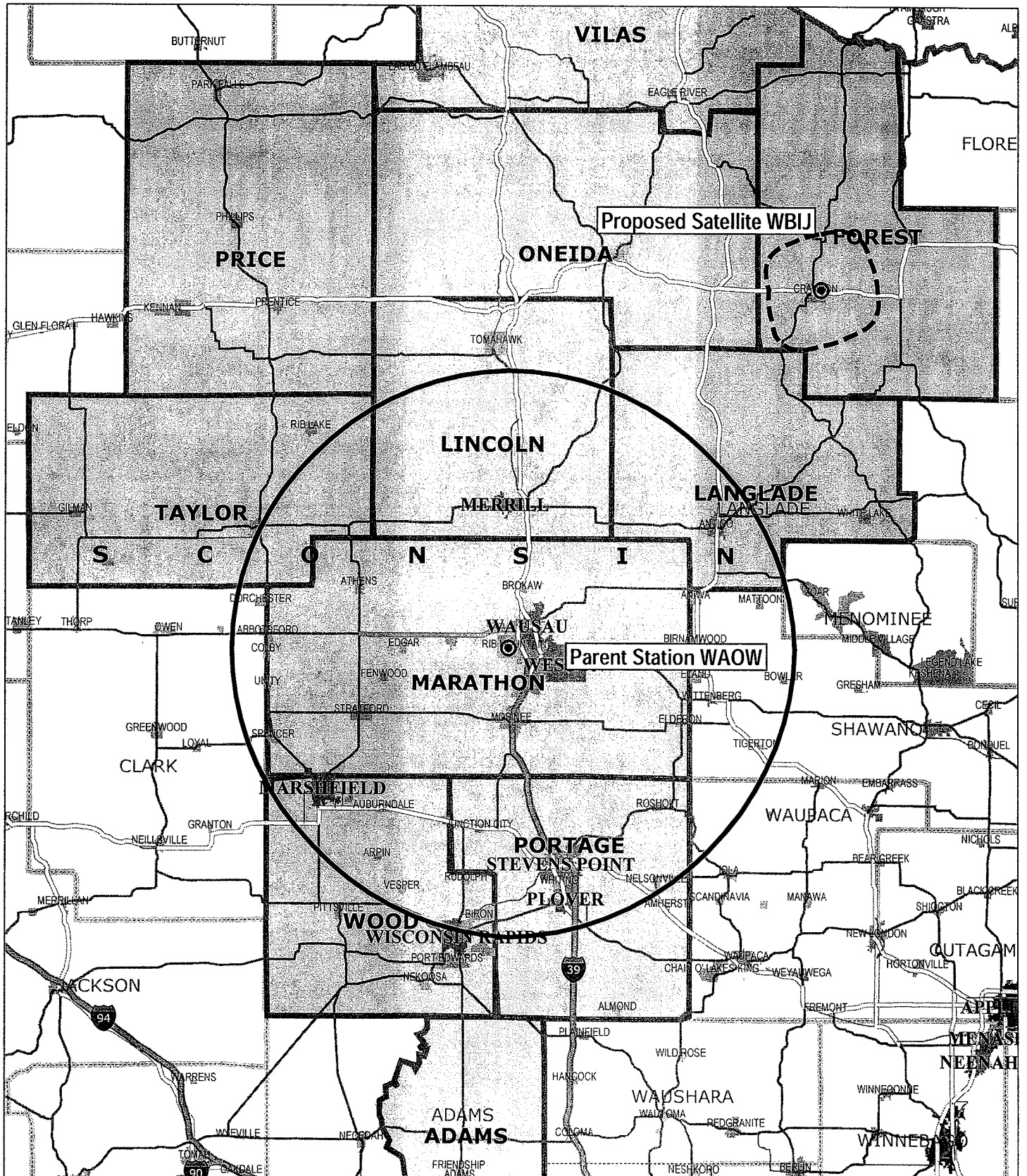
Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. Scott Turpie", is written over a horizontal line.

D. Scott Turpie

**LOHNES AND CULVER**  
8309 Cherry Lane  
Laurel, MD 20707-4830  
Telephone: 301-776-4488

January 2009



**LOHNES AND CULVER**  
 LAUREL, MARYLAND  
 JANUARY 2009

**PREDICTED CITY GRADE CONTOURS  
 SATELLITE STATION ELIGIBILITY SHOWING**  
 — WAOW 77 dBu BCLT20011009ADH  
 - - - WBIJ 74 dBu BCLT20030812AAQ  
 Designated Market Area (DMA)  
 Wausau-Rhineland, WI  
 0 15 30 45  
 Kilometers

**FIGURE 1**

## **Attachment B**

Letter from Paramount Media Advisors, Inc.

**Paramount Media Advisors, Inc.**

**500 N. Michigan Avenue**

**Suite 300**

**Chicago, Illinois 60611**

**312-396-4043**

**312-396-4177 (Fax)**

February 2, 2009

Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Dear Sir/Madam:                      RE:    WBIJ-TV / Crandon, Wisconsin

This letter is to inform you of the background of Paramount Media Advisors, Inc. and the marketing efforts in connection with the marketing of television station WBIJ-TV, an independent television station licensed to Crandon, Wisconsin and serving the Wausau-Rhineland, Wisconsin television market on Channel 4.

The undersigned principal of Paramount Media Advisors, Inc. and its predecessor companies has been involved in the buying and selling of television broadcasting stations for over three decades. I have extensive knowledge of the television industry in general, having owned and operated television and radio properties over a period of thirty years. I have owned and operated television and radio broadcast properties for both my own benefit and for the benefit of public shareholders, such as the Merrill-Lynch Media Partners partnership. I have both consulted for and appraised television stations for a variety of purposes, including acquisitions, divestitures, mergers, financing, and restructuring of debt. In some instances the valuations have formed the basis for testimony in court cases involving bankruptcy, for both petitioners and estates. I have been personally involved in the acquisition or sale of more than 75 television broadcast properties in both large and small television markets.

As mentioned above, Paramount Media Advisors, Inc. was retained in November, 2006 by Selenka Communications, LLC to market WBIJ-TV. We prepared an Offering Memorandum in keeping with our standard marketing practices. We contacted approximately 25 potential buyers, including both in-market, adjacent market and out-of-market broadcast companies. Our marketing efforts consist of an initial contact by phone which appraises the potential buyer of the availability of the subject broadcast property. If the potential buyer expresses interest, he/she is then asked to sign our standard Non-Disclosure Agreement prior to receiving a formal copy of the Offering Memorandum. In the case of our marketing efforts for WBIJ-TV, only one prospective buyer, an out-of-market broadcaster, signed the required Non-Disclosure Agreement and received the formal Offering Memorandum. The potential buyer appeared to be sincerely interested and appeared to possess the financial ability to close a transaction. We met with the buyer at the station in Crandon, Wisconsin for the purpose of inspecting the assets of WBIJ-TV. Following the inspection visit, the



potential buyer informed us that in their judgment the additional costs involved in making WBIJ-TV a viable part of the Wausau-Rhineland, Wisconsin market as a stand alone station would not result in a successful investment. We received no formal offers for the station and only one potential buyer, as noted, expressed an initial interest.

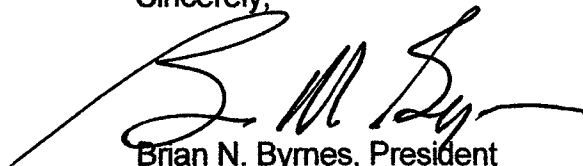
It is our opinion that WBIJ-TV could not be marketed to an out-of-market purchaser for the following reasons:

1. The Wausau-Rhineland, Wisconsin television market is ranked 134<sup>th</sup> in size based on television homes and yet is ranked 141<sup>st</sup> in television revenue. Buyers generally look for a revenue ranking to match or exceed the television homes size ranking
2. All five of the major broadcast networks have current affiliations in place in the Wausau-Rhineland market and the most popular syndicated programming is already under contract with one of the five major network affiliates.
3. WBIJ-TV is currently operated from a 390 foot tower with what amounts to a lower power transmitter and as such covers only its City of License; Crandon, Wisconsin. A buyer would be required to almost certainly build a tower at considerable expense and to install a full power transmitter to achieve coverage of the Wausau-Rhineland market, while maintaining coverage for the City of License. In addition, the digital build out of WBIJ-TV has not as yet been implemented. The expense of building a tower and the expense of meeting the digital build out would be substantial and a seasoned out-of-market buyer or investor would not be interested.

Should you require additional information, please feel free to contact the undersigned at the address and phone number as indicated in the letterhead.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Sincerely,



Brian N. Byrnes, President  
Paramount Media Advisors, Inc.

BNB: me