

## Exhibit 16

Neither Liberty Media Corporation ("Liberty Media") nor any of its subsidiaries currently holds any broadcast licenses. However, Liberty Media, the ultimate parent company of LMC BET Holdings, LLC, holds an indirect 16.3 percent equity interest in News Corporation ("News Corp."), which represents approximately 19.1 percent of the voting power of News Corp.

On December 22, 2006, Liberty Media and News Corp. entered into a Share Exchange Agreement pursuant to which Liberty Media will exchange its ownership interest in News Corp. for 100 percent of the capital stock of a subsidiary of News Corp. that will hold News Corp.'s interest in the DIRECTV Group, Inc. ("DTV"), three regional sports networks, and \$550 million in cash. On January 29, 2007, Liberty Media, News Corp. and DTV filed applications with the FCC seeking the FCC's consent to the transfer of *de facto* control of DTV from News Corp. to Liberty Media. The lead application filed in connection with that transaction describes the transaction in detail and contains all supporting information. See File No. SAT-T/C-20070129-00021. Consummation of the proposed DTV transaction will eliminate Liberty Media's ownership interest in News Corp. Liberty Media therefore will no longer hold an attributable ownership interest in the broadcast television stations owned and operated by News Corp.

The Form 323 Ownership Report filed by News Corp. with the FCC on January 29, 2007 (Ownership Report File No. BOS20070129ABC) lists the following owned and operated television stations:

Call Letters	Facility Identification Number	Location
KTTV	22208	Los Angeles, CA
KDVR	126	Denver, CO
KFCT	125	Ft. Collins, CO
KFTC	83714	Bemidji, MN
KMSP-TV	68883	Minneapolis, MN
KRIV	22204	Houston, TX
KSTU	22215	Salt Lake City, UT
KTXH	51569	Houston, TX

<b>Call Letters</b>	<b>Facility Identification Number</b>	<b>Location</b>
KUTP	68886	Phoenix, AR
WDCA	51567	Washington, DC
WTFX-TV	51568	Philadelphia, PA
WFXT	6463	Boston, MA
KCOP-TV	33742	Los Angeles, CA
WOGX	70651	Ocala, FL
WITI	73107	Milwaukee, WI
WFLD	22211	Chicago, IL
WFTC	11913	Minneapolis, MN
WHBQ-TV	12521	Memphis, TN
WNYW	22206	New York, NY
WOFL	41225	Orlando, FL
WPWR-TV	48772	Gary, IN
WRBW	54940	Orlando, FL
WTTG	22207	Washington, DC
WUTB	60552	Baltimore, MD
WWOR-TV	74197	Secaucus, NJ
KDFI	17037	Dallas, TX
KSAZ-TV	35587	Phoenix, AZ
KTBC	35649	Austin, TX
KTVI	35693	St. Louis, MO

<b>Call Letters</b>	<b>Facility Identification Number</b>	<b>Location</b>
WAGA	70689	Atlanta, GA
WBRC	71221	Birmingham, AL
WDAF-TV	11291	Kansas City, MO
WJBK	73123	Detroit, MI
WJW	73150	Cleveland, OH
WTVT	68569	Tampa, FL
WGHP	72106	High Point, NC
KDFW	33770	Dallas, TX

~ Doc# 19593.1 ~

## Request for Continued Waiver of the Local Main Studio Rule

In connection with this Form 315 transfer of control application, LMC BET Holdings, LLC (“LMC BET”) respectfully requests that the FCC grant a continued waiver of the local main studio rule for WJMN-TV (“WJMN”), licensed to Escanaba, Michigan. The FCC originally granted WJMN a waiver of the main studio rule in 2000. WJMN operates as a satellite of WFRV-TV located in Green Bay, Wisconsin.<sup>1</sup> *See In the Matter of the Applications of the Shareholders of CBS Corporation (Transferor) and Viacom, Inc. (Transferee), for Transfer of Control of CBS Corporation and Certain Subsidiaries, Licensees of KCBS-TV, Los Angeles, CA, et al.*, 15 FCC Rcd. 8230 (2000). As set forth below, the FCC's bases for granting WJMN a waiver of the local main studio rule remain valid today and warrant continued grant of the waiver.

The FCC's rules require that a local main studio be maintained either within the station's community of license; within the principal contour of any AM, FM or television broadcast station licensed to the station's community of license, or within 25 miles from the reference coordinates of the center of its community of license. *See* 47 C.F.R. §73.1125(a). However, a main studio may be maintained beyond these limits “when good cause exists...and when doing so would be consistent with the operation of the station in the public interest.” *See* 47 C.F.R. §73.1125(b). In 2000, the FCC expressly found that the Escanaba market “is extremely limited in size, that no other station is licensed to that community and that maintenance of a main studio in Escanaba is not economically viable.” The FCC accordingly granted the waiver. *See* 15 FCC Rcd. at 8244. These fundamental underlying conditions continue to apply.

### **A. Market Size**

WJMN is licensed to the community of Escanaba, Michigan, within the Marquette, Michigan, DMA. The Marquette DMA currently is ranked 178<sup>th</sup> out of 210 Nielsen DMAs in the United States. *See 2007 Television and Cable Factbook*, Vol. 1, at A-6. In fact, at the time the FCC granted WJMN a waiver of the local main studio rule, Marquette ranked as the 177<sup>th</sup> Nielsen DMA. *See* Statement of Viacom, Inc., File Nos. BTCCT-19991116ABA, et al.

The Marquette DMA today includes 89,670 Nielsen DMA households. Comparably sized DMAs include Alexandria, Louisiana (DMA rank 179; 89,600 television households); Jonesboro, Arkansas (DMA rank 180; 89,500 households) and Harrisonburg, Virginia (DMA rank 181; 87,630 households). *See 2007 Television and Cable Factbook*, Vol. 1, at A-6.

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<sup>1</sup> The FCC also noted that a satellite exemption to permit WJMN's operations as a satellite of WFRV-TV was no longer required pursuant to 47 C.F.R. §73.3555(b) because the stations are licensed to separate Designated Market Areas (“DMAs”). *See* 15 FCC Rcd. at 8243.

Thus, the Marquette DMA encompassing WJMN's community of license continues to be a small market DMA within the United States.

**B. Community of License**

As noted above, one of the primary bases supporting the grant of the local main studio rule waiver was WJMN's status as the only television station licensed to the Escanaba, Michigan, community. WJMN today continues to be the only television station licensed to Escanaba. *See 2007 Television and Cable Factbook*, Vol. 1, at A-1138 - A-1213.

**C. Economic Conditions**

Finally, a review of economic data for the Escanaba/Marquette, Michigan, area demonstrates that, consistent with the FCC's previous determination, WJMN's maintenance of a local main studio in its community of license would not be economically viable:

- Delta County, which includes Escanaba, and Marquette County in the Marquette DMA have unemployment rates significantly higher than the current national unemployment rate of 4.6 percent for January 2007. The unemployment rates in December 2006 for Escanaba and Marquette were 7.8 percent and 6.4 percent, respectively. *See Attached U.S. Department of Labor Statistical Abstracts*. According to the attached Michigan Department of Labor and Economic Growth data, the 2006 annual unemployment rates for Delta and Michigan Counties were 6.9 percent and 5.8 percent, respectively.
- According to U.S. Census Bureau data, 2003 median household income in Delta County (\$37,221) and Marquette County (\$36,993) was below the median statewide income for Michigan (\$46,291). *See Attached U.S. Census Bureau State and County Quick Facts*.
- The attached U.S. Census Bureau data show that the combined population levels for Escanaba and Marquette Counties from 2000 to 2005 were essentially stagnant. Delta County's population declined during this time period by 0.4 percent while Marquette County's population increased by 0.2 percent.

In sum, because WFRV continues to be the only television station licensed to a small market community in an area that would not support the location of a local main studio, LMC BET respectfully requests that the FCC continue to waive the local main studio rule for WJMN.



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## Local Area Unemployment Statistics

Series Id: LAUMC26215403, LAUMC26215404, LAUMC26215405, LAUMC26215406  
 Not Seasonally Adjusted  
 Area: Escanaba, MI Micropolitan Statistical Area  
 Area Type: Micropolitan areas  
 State/Region/Division: Michigan

Year	Period	labor force	employment	unemployment	unemployment rate
1996	Jan	17493(s)	15773(s)	1720(s)	9.8(s)
1996	Feb	17606(s)	15944(s)	1662(s)	9.4(s)
1996	Mar	17673(s)	16147(s)	1526(s)	8.6(s)
1996	Apr	17709(s)	16050(s)	1659(s)	9.4(s)
1996	May	18583(s)	16928(s)	1655(s)	8.9(s)
1996	Jun	18964(s)	17383(s)	1581(s)	8.3(s)
1996	Jul	18801(s)	17322(s)	1479(s)	7.9(s)
1996	Aug	19033(s)	17828(s)	1205(s)	6.3(s)
1996	Sep	18682(s)	17607(s)	1075(s)	5.8(s)
1996	Oct	18547(s)	17585(s)	962(s)	5.2(s)
1996	Nov	18687(s)	17484(s)	1203(s)	6.4(s)
1996	Dec	18271(s)	16932(s)	1339(s)	7.3(s)
1996	Annual	18337(s)	16915(s)	1422(s)	7.8(s)
1997	Jan	18279(s)	16571(s)	1708(s)	9.3(s)
1997	Feb	18343(s)	16628(s)	1715(s)	9.3(s)

<b>2005</b>	<b>Annual</b>	20614(d)	19177(d)	1437(d)	7.0(d)
<b>2006</b>	<b>Jan</b>	20432	18845	1587	7.8
<b>2006</b>	<b>Feb</b>	20504	18753	1751	8.5
<b>2006</b>	<b>Mar</b>	20802	18960	1842	8.9
<b>2006</b>	<b>Apr</b>	20879	19227	1652	7.9
<b>2006</b>	<b>May</b>	21158	19833	1325	6.3
<b>2006</b>	<b>Jun</b>	21427	20104	1323	6.2
<b>2006</b>	<b>Jul</b>	22453	21042	1411	6.3
<b>2006</b>	<b>Aug</b>	21546	20220	1326	6.2
<b>2006</b>	<b>Sep</b>	21086	19884	1202	5.7
<b>2006</b>	<b>Oct</b>	20722	19672	1050	5.1
<b>2006</b>	<b>Nov</b>	20942	19505	1437	6.9
<b>2006</b>	<b>Dec</b>	20920	19288	1632	7.8

s : Reflects 2000 Census-based geography and new model-based controls at the state level.  
d : Reflects revised inputs, reestimation, and new statewide controls through 2005.

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## Local Area Unemployment Statistics

Series Id: LAUMC26321003, LAUMC26321004, LAUMC26321005, LAUMC26321006  
 Not Seasonally Adjusted  
 Area: Marquette, MI Micropolitan Statistical Area  
 Area Type: Micropolitan areas  
 State/Region/Division: Michigan

Year	Period	labor force	employment	unemployment	unemployment rate
1996	Jan	31219(s)	28605(s)	2614(s)	8.4(s)
1996	Feb	31171(s)	28801(s)	2370(s)	7.6(s)
1996	Mar	31012(s)	28741(s)	2271(s)	7.3(s)
1996	Apr	30969(s)	28839(s)	2130(s)	6.9(s)
1996	May	31467(s)	29426(s)	2041(s)	6.5(s)
1996	Jun	31887(s)	29968(s)	1919(s)	6.0(s)
1996	Jul	31618(s)	29958(s)	1660(s)	5.3(s)
1996	Aug	31476(s)	29965(s)	1511(s)	4.8(s)
1996	Sep	31526(s)	30140(s)	1386(s)	4.4(s)
1996	Oct	31833(s)	30608(s)	1225(s)	3.8(s)
1996	Nov	32051(s)	30492(s)	1559(s)	4.9(s)
1996	Dec	31811(s)	30068(s)	1743(s)	5.5(s)
1996	Annual	31503(s)	29634(s)	1869(s)	5.9(s)
1997	Jan	30798(s)	28500(s)	2298(s)	7.5(s)
1997	Feb	31813(s)	29539(s)	2274(s)	7.1(s)

<b>2005</b>	<b>Annual</b>	35892(d)	33895(d)	1997(d)	5.6(d)
<b>2006</b>	<b>Jan</b>	35907	33779	2128	5.9
<b>2006</b>	<b>Feb</b>	36601	34109	2492	6.8
<b>2006</b>	<b>Mar</b>	36730	34077	2653	7.2
<b>2006</b>	<b>Apr</b>	36521	34091	2430	6.7
<b>2006</b>	<b>May</b>	36535	34613	1922	5.3
<b>2006</b>	<b>Jun</b>	36507	34567	1940	5.3
<b>2006</b>	<b>Jul</b>	36553	34479	2074	5.7
<b>2006</b>	<b>Aug</b>	36261	34300	1961	5.4
<b>2006</b>	<b>Sep</b>	36610	34718	1892	5.2
<b>2006</b>	<b>Oct</b>	36622	34934	1688	4.6
<b>2006</b>	<b>Nov</b>	36612	34586	2026	5.5
<b>2006</b>	<b>Dec</b>	36804	34462	2342	6.4

s : Reflects 2000 Census-based geography and new model-based controls at the state level.

d : Reflects revised inputs, reestimation, and new statewide controls through 2005.

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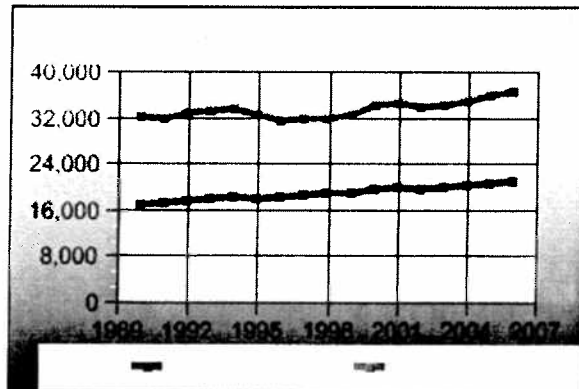
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2006	Annual	Delta	Not Adj	Not Pre	21,073	19,611	1,462	6.9	
2005	Annual	Delta	Not Adj	Not Pre	20,614	19,177	1,437	7.0	
2004	Annual	Delta	Not Adj	Not Pre	20,432	18,828	1,604	7.9	
2003	Annual	Delta	Not Adj	Not Pre	20,099	18,427	1,672	8.3	
2002	Annual	Delta	Not Adj	Not Pre	19,766	18,317	1,449	7.3	
2001	Annual	Delta	Not Adj	Not Pre	20,052	18,786	1,266	6.3	
2000	Annual	Delta	Not Adj	Not Pre	19,809	18,775	1,034	5.2	
1999	Annual	Delta	Not Adj	Not Pre	19,141	18,029	1,112	5.8	
1998	Annual	Delta	Not Adj	Not Pre	18,911	17,752	1,159	6.1	
1997	Annual	Delta	Not Adj	Not Pre	18,769	17,444	1,325	7.1	
1996	Annual	Delta	Not Adj	Not Pre	18,337	16,915	1,422	7.8	
1995	Annual	Delta	Not Adj	Not Pre	18,051	16,317	1,734	9.6	
1994	Annual	Delta	Not Adj	Not Pre	18,160	16,225	1,935	10.7	
1993	Annual	Delta	Not Adj	Not Pre	17,815	15,761	2,054	11.5	
1992	Annual	Delta	Not Adj	Not Pre	17,565	15,094	2,471	14.1	
1991	Annual	Delta	Not Adj	Not Pre	17,228	15,170	2,058	11.9	
1990	Annual	Delta	Not Adj	Not Pre	16,975	15,396	1,579	9.3	
2006	Annual	Marquette	Not Adj	Not Pre	36,522	34,393	2,129	5.8	
2005	Annual	Marquette	Not Adj	Not Pre	35,892	33,895	1,997	5.6	
2004	Annual	Marquette	Not Adj	Not Pre	34,889	32,789	2,100	6.0	
2003	Annual	Marquette	Not Adj	Not Pre	34,270	32,029	2,241	6.5	
2002	Annual	Marquette	Not Adj	Not Pre	33,744	31,444	2,300	6.8	
2001	Annual	Marquette	Not Adj	Not Pre	34,570	32,708	1,862	5.4	
2000	Annual	Marquette	Not Adj	Not Pre	34,183	32,704	1,479	4.3	
1999	Annual	Marquette	Not Adj	Not Pre	32,518	30,854	1,664	5.1	
1998	Annual	Marquette	Not Adj	Not Pre	31,775	30,268	1,507	4.7	
1997	Annual	Marquette	Not Adj	Not Pre	31,925	30,097	1,828	5.7	
1996	Annual	Marquette	Not Adj	Not Pre	31,503	29,634	1,869	5.9	
1995	Annual	Marquette	Not Adj	Not Pre	32,509	29,933	2,576	7.9	
1994	Annual	Marquette	Not Adj	Not Pre	33,695	31,149	2,546	7.6	
1993	Annual	Marquette	Not Adj	Not Pre	33,181	30,674	2,507	7.6	
1992	Annual	Marquette	Not Adj	Not Pre	32,884	30,087	2,797	8.5	
1991	Annual	Marquette	Not Adj	Not Pre	32,007	29,448	2,559	8.0	
1990	Annual	Marquette	Not Adj	Not Pre	32,124	29,552	2,572	8.0	



**U.S. Census Bureau**

## State &amp; County QuickFacts

**Delta County, Michigan**

<b>People QuickFacts</b>	<b>Delta County</b>	<b>Michigan</b>
Population, 2005 estimate	38,347	10,120,860
Population, percent change, April 1, 2000 to July 1, 2005	-0.4%	1.8% ←
Population, 2000	38,520	9,938,444
Persons under 5 years old, percent, 2005	5.3%	6.4%
Persons under 18 years old, percent, 2005	21.6%	24.9%
Persons 65 years old and over, percent, 2005	17.9%	12.4%
Female persons, percent, 2005	50.4%	50.8%
White persons, percent, 2005 (a)	96.0%	81.3%
Black persons, percent, 2005 (a)	0.2%	14.3%
American Indian and Alaska Native persons, percent, 2005 (a)	2.2%	0.6%
Asian persons, percent, 2005 (a)	0.4%	2.2%
Native Hawaiian and Other Pacific Islander, percent, 2005 (a)	0.0%	0.0%
Persons reporting two or more races, percent, 2005	1.3%	1.5%
Persons of Hispanic or Latino origin, percent, 2005 (b)	0.8%	3.8%
White persons not Hispanic, percent, 2005	95.2%	77.9%
Living in same house in 1995 and 2000, pct 5 yrs old & over	66.5%	57.3%
Foreign born persons, percent, 2000	1.0%	5.3%
Language other than English spoken at home, pct age 5+, 2000	2.5%	8.4%
High school graduates, percent of persons age 25+, 2000	86.1%	83.4%
Bachelor's degree or higher, pct of persons age 25+, 2000	17.1%	21.8%
Persons with a disability, age 5+, 2000	7,106	1,711,231
Mean travel time to work (minutes), workers age 16+, 2000	18.8	24.1
Housing units, 2005	20,045	4,478,507
Homeownership rate, 2000	79.6%	73.8%
Housing units in multi-unit structures, percent, 2000	13.1%	18.8%
Median value of owner-occupied housing units, 2000	\$80,000	\$115,600
Households, 2000	15,836	3,785,661
Persons per household, 2000	2.40	2.56
Median household income, 2003	\$37,221	\$46,291 ←

# U.S. Census Bureau

## State & County QuickFacts

### Marquette County, Michigan

People QuickFacts	Marquette County	Michigan
Population, 2005 estimate	64,760	10,120,860
Population, percent change, April 1, 2000 to July 1, 2005	0.2%	1.8%
Population, 2000	64,634	9,938,444
Persons under 5 years old, percent, 2005	4.7%	6.4%
Persons under 18 years old, percent, 2005	19.0%	24.9%
Persons 65 years old and over, percent, 2005	14.0%	12.4%
Female persons, percent, 2005	50.1%	50.8%
White persons, percent, 2005 (a)	95.3%	81.3%
Black persons, percent, 2005 (a)	1.6%	14.3%
American Indian and Alaska Native persons, percent, 2005 (a)	1.6%	0.6%
Asian persons, percent, 2005 (a)	0.5%	2.2%
Native Hawaiian and Other Pacific Islander, percent, 2005 (a)	0.0%	0.0%
Persons reporting two or more races, percent, 2005	1.1%	1.5%
Persons of Hispanic or Latino origin, percent, 2005 (b)	0.8%	3.8%
White persons not Hispanic, percent, 2005	94.6%	77.9%
Living in same house in 1995 and 2000, pct 5 yrs old & over	58.3%	57.3%
Foreign born persons, percent, 2000	1.4%	5.3%
Language other than English spoken at home, pct age 5+, 2000	4.4%	8.4%
High school graduates, percent of persons age 25+, 2000	88.5%	83.4%
Bachelor's degree or higher, pct of persons age 25+, 2000	23.7%	21.8%
Persons with a disability, age 5+, 2000	9,271	1,711,231
Mean travel time to work (minutes), workers age 16+, 2000	17.7	24.1
Housing units, 2005	34,080	4,478,507
Homeownership rate, 2000	69.8%	73.8%
Housing units in multi-unit structures, percent, 2000	21.8%	18.8%
Median value of owner-occupied housing units, 2000	\$77,200	\$115,600
Households, 2000	25,767	3,785,661
Persons per household, 2000	2.35	2.56
Median household income, 2003	\$36,993	\$46,291