

## EXHIBIT 15

### **REQUEST FOR CONTINUED OPERATION UNDER SATELLITE EXCEPTION**

This application seeks consent to the assignment of the licenses of WFQX-TV, Cadillac, Michigan, and WFUP(TV), Vanderbilt, Michigan (the “Stations”), from Rockfleet Broadcasting II, Inc. (“Rockfleet”) to Cadillac Telecasting Co. (“Cadillac”). As the Grade B contours of the Stations overlap slightly, Cadillac respectfully requests authority to continue operating WFUP as a satellite of WFQX-TV, pursuant to the exception established at Note 5 of Section 73.3555 of the Commission’s rules.

The Stations’ Grade B overlap resulted from a modification of the facilities of WFUP, as authorized by the Commission in FCC File No. BPCT-960703KH. The then permittee—GRK Productions Joint Venture (“GRK”)—sought authority to operate WFUP as a satellite of WFQX-TV in connection with the application to license the newly constructed facilities (FCC File No. BLCT-970626KE). Although WFUP previously operated essentially as a satellite of WFQX-TV, the Commission’s ownership rules were not implicated prior to the creation of the slight Grade B overlap.

The Commission granted the request, finding that GRK had set forth sufficiently compelling arguments to support an *ad hoc* determination that a grant would serve the public interest. See Memorandum Opinion and Order 13 FCC Rcd 12168 (1998). Specifically, the Commission found that there is no City Grade contour overlap between the Stations and that WFUP provides service to an underserved area according to the “transmission test,” as WFUP was the only station licensed to the community of Vanderbilt, Michigan. See id. at 12169. The Commission also found that the size of WFUP’s community, the area’s small economic base,

and the existence of other satellite combinations supported a satellite exception for WFUP under the duopoly rule. See id. at 12170.

The Commission grant to GRK was made subject to the outcome of its television ownership rule making in MM Docket Nos. 91-221 and 87-8. In the subsequent Report and Order, released August 6, 1999, the Commission determined that “continued exception of satellite stations from the duopoly rule is appropriate.” See Report and Order at ¶¶ 90-91. Consent to continue operating WFUP as a satellite of WFQX-TV was applied for and granted in connection with the application for Commission consent to assign the Stations’ licensees from GRK to Rockfleet (FCC File No. BALCT-19990830AAK).

The circumstances pursuant to which the Commission granted GRK authority to operate WFUP as a satellite of WFQX-TV—and later consented to continued operation as a satellite by Rockfleet—have not changed materially. Accordingly, Cadillac respectfully requests authority to continue operating WFUP as a satellite of WFQX-TV.