

## **Multiple Ownership Compliance**

Pursuant to this application, NBC Telemundo License LLC (“NBCTLL”) proposes to acquire from Ramar Communications, Inc. the following four full-power television stations in the Albuquerque-Santa Fe, New Mexico Nielsen Designated Market Area (“Albuquerque-Santa Fe DMA”):

KASA-TV, Santa Fe, New Mexico (FIN 32311);  
KRTN-TV, Durango, Colorado (FIN 82613);  
KTEL-TV, Carlsbad, New Mexico (FIN 83707); and  
KUPT, Hobbs, New Mexico (FIN 27431).

NBCTLL will be compliant with the FCC’s local television ownership rule because the rule is not triggered by the instant transaction. With the exception of a *de minimis* overlap between KTEL-TV, Carlsbad, New Mexico and KUPT, Hobbs, New Mexico, which the FCC previously approved, the noise limited service contours of the above-listed four full-power television stations do not overlap.<sup>1</sup> Based on *TVStudy* (2.2.5 version), the population in the KTEL-TV and KUPT overlap area is only five persons.<sup>2</sup> The FCC has previously recognized that such overlap is *de minimis* and not cognizable.<sup>3</sup> See, e.g., *Soda Mountain Broadcasting, Inc.*, 29 FCC Rcd 5781, 5782 (Vid. Div. 2014) (acknowledging 179 persons in overlap area to be *de minimis*); *Mark III Media, Inc.*, 21 FCC Rcd 6255 (Vid. Div. 2006) (noting that a satellite exception was no longer required to permit common ownership of multiple television stations in the same DMA when there was either *de minimis* or no Grade B overlap among the stations). Accordingly, NBCTLL’s ownership of the instant stations will comply with the FCC’s local television ownership rule.

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<sup>1</sup> See Map of NLSC for Full-Power Stations, attached hereto as Exhibit 1.

<sup>2</sup> See Enlarged Map of NLSC Overlap for KTEL-TV and KUPT, attached hereto as Exhibit 2.

<sup>3</sup> On January 11, 2017, the FCC granted an assignment application to Ramar Communications, Inc. (the proposed assignor in the instant application) for ownership of these stations that included a *de minimis* overlap showing for KTEL-TV and KUPT (File No. BALCDT-20160708ABF). In addition, the Grade B contours of KTEL-TV and KUPT did not overlap prior to the DTV transition. See Exhibit 18 to File No. BALCDT-20160708ABF.

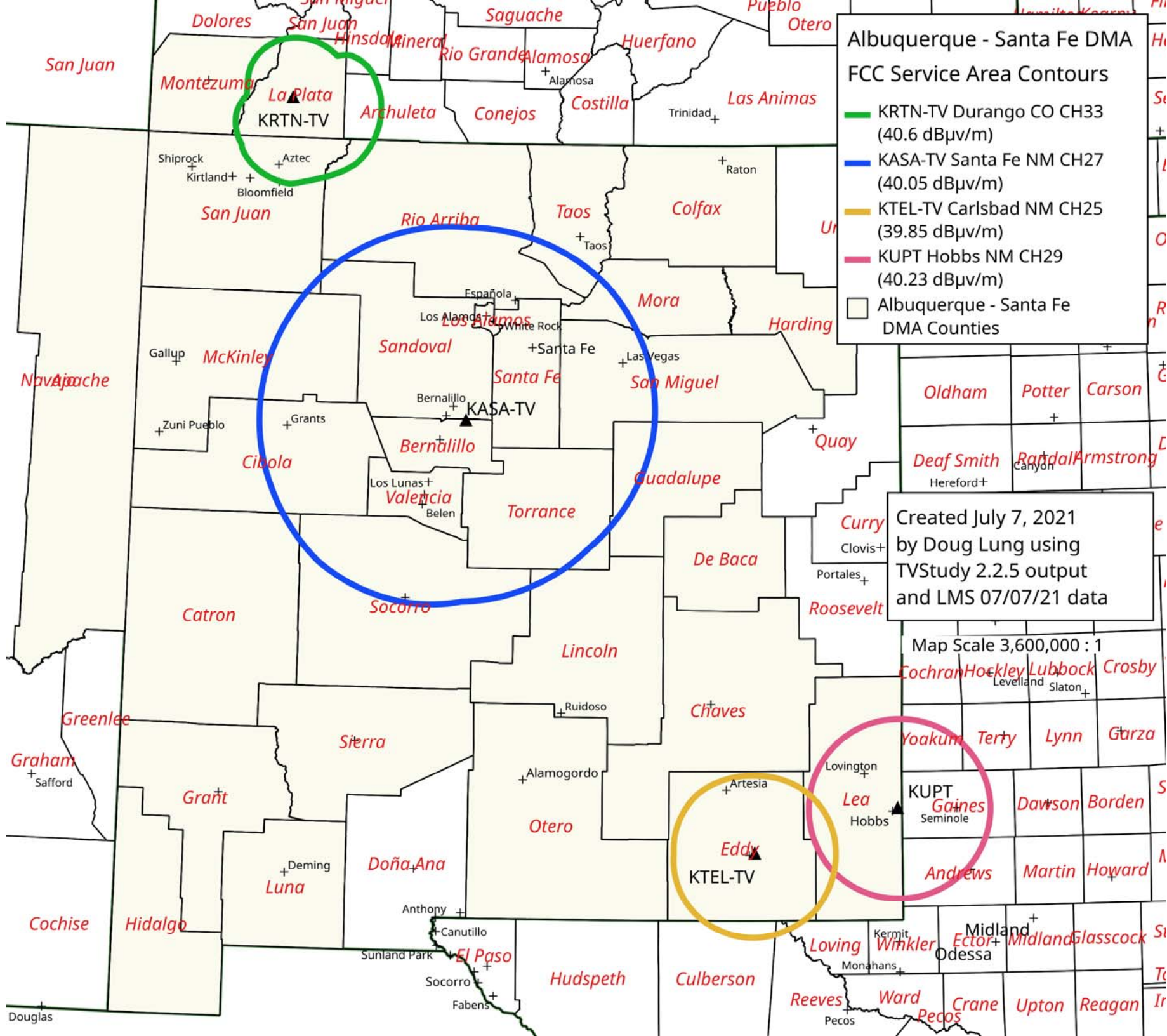
**Exhibit 1**

# Albuquerque - Santa Fe DMA FCC Service Area Contours

- KRTN-TV Durango CO CH33  
(40.6 dBμv/m)
- KASA-TV Santa Fe NM CH27  
(40.05 dBμv/m)
- KTEL-TV Carlsbad NM CH25  
(39.85 dBμv/m)
- KUPT Hobbs NM CH29  
(40.23 dBμv/m)
- Albuquerque - Santa Fe  
DMA Counties

Created July 7, 2021  
by Doug Lung using  
TVStudy 2.2.5 output  
and LMS 07/07/21 data

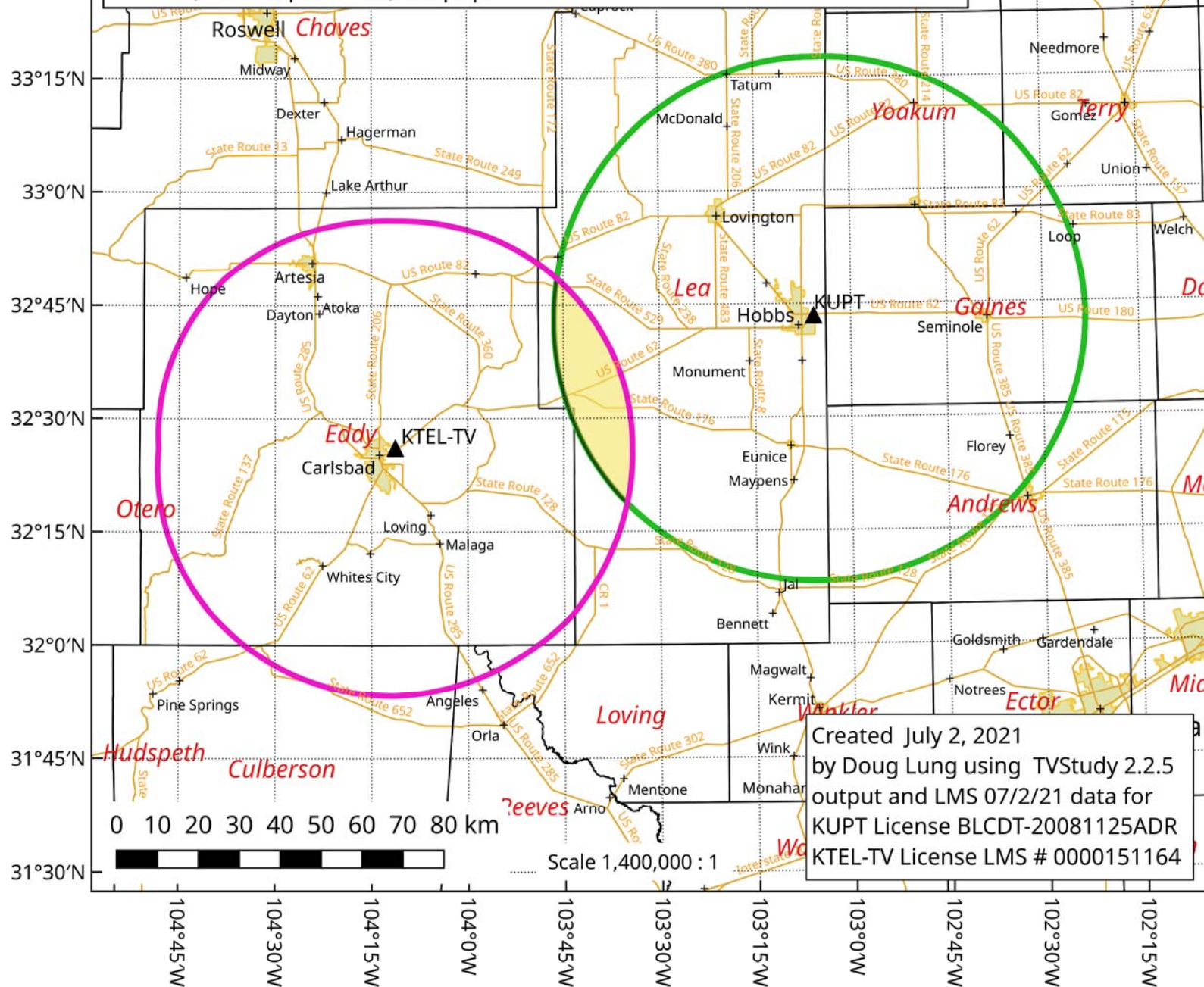
Map Scale 3,600,000 : 1



**Exhibit 2**

33°45'N  
33°30'N  
33°15'N  
33°0'N  
32°45'N  
32°30'N  
32°15'N  
32°0'N  
31°45'N  
31°30'N

 KTEL-TV - KUPT Contour Overlap  
575.1 sq. km 5 pop.



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output and LMS 07/2/21 data for  
KUPT License BLCDDT-20081125ADR  
KTEL-TV License LMS # 0000151164