

**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”).<sup>1</sup> 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.<sup>2</sup>

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

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<sup>1</sup> 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.

<sup>2</sup> 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.

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 STATION LICENSED TO CB TEXAS LICENSES, L.P.**

The instant application seeks FCC consent to assignment of the licenses of the single station licensed to Clear Channel subsidiary CCB Texas Licenses, L.P., WOAI-TV, San Antonio, Texas (Ch. 4, NBC). WOAI-TV is located in the San Antonio, Texas Designated Market Area (the 37th ranked DMA). Through PEP’s 19% interest in Univision, TVA will have an attributable interest in stations KWEX-TV, San Antonio (Ch. 41, Univision), and KNIC-TV, Blanco (Ch. 17, Telefutera), both Texas. Although only WOAI-TV is top four ranked and the San Antonio DMA would have 10 full-power, operational and independently-owned television stations following consummation of the transaction, because of the recent activation of KNIC-TV, TVA would have a temporary attributable interest in a third TV station in the market.<sup>3</sup> Accordingly, TVA seeks a temporary 6-month waiver of the duopoly rule to allow it a short

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<sup>3</sup> Although Blanco, Texas, the community of license of newly-activated KNIC-TV is in Blanco County, a county situated within the neighboring Austin DMA, at the request of Univision Nielsen has assigned the station to the San Antonio DMA.

period of time following consummation of the transaction to bring its San Antonio holdings into compliance with the rule.<sup>4</sup>

Grant of the requested 6-month waiver accords with Commission precedent approving large, multi-market, multi-station transactions.<sup>5</sup> The Commission has observed that “the overall benefits of allowing time for an orderly divestiture . . . outweigh any temporary impact on diversity and competition from common ownership,”<sup>6</sup> and it has, accordingly, granted waivers in multi-station, multi-market transactions. Temporary waivers in the context of multi-station, multi-market acquisitions serve the public interest because, among other benefits, they allow for orderly divestiture of stations and avoid the unnecessary devaluation of stations and restriction of potential buyers that could occur if the stations had to be divested rapidly in a “fire sale.”<sup>7</sup> Temporary waivers also avoid artificial limitations on the range of potential buyers.<sup>8</sup>

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<sup>4</sup> Univision also has a compliant attributable interest in seven radio stations (5 FM and 2 AM) located within the San Antonio DMA. For the reasons described herein, a temporary waiver of the radio-television cross ownership rule also is respectfully requested with respect to the period of common ownership of WOAI-TV and the Univision radio stations.

<sup>5</sup> See *Telemundo Communications Group, Inc.*, 17 FCC Rcd 6958, 6978 ¶ 51 (2002) (“NBC/Telemundo”), citing *UTV of San Francisco*, 16 FCC Rcd 14975 (2001) (“Fox/Chris-Craft”), *aff’d*, *Office of Communication of the United Church of Christ v. Fed. Communications Comm’n*, 2002 WL 31596407 (2002). See also *Multimedia, Inc.*, 11 FCC Rcd 4883, 4885 ¶ 5 (1995); *Stockholders of CBS, Inc.*, 11 FCC Rcd 3733, 3755 ¶ 44 (1995) (“CBS/Westinghouse”); *Milton S. Maltz*, 13 FCC Rcd 15527, 15533-34 ¶ 20 (1998) (“Maltz”); *Guy Gannett*, 14 FCC Rcd 6204, 6216 ¶ 36 (1999).

<sup>6</sup> *NBC/Telemundo* at 6978 ¶ 51, citing *Fox/Chris-Craft*. See also *CBS/Westinghouse* at 3755; *Providence Journal Co.*, 12 FCC Rcd 2883 (1997).

<sup>7</sup> *Providence Journal Co.*, 12 FCC Rcd 2883 (1997); *Fox/Chris-Craft* at 14984.

<sup>8</sup> *Fox/Chris-Craft* at 14984.

In addition to the brief duration of the waiver period requested by TVA,<sup>9</sup> the existing diversity of voices and competition in the markets at issue – together with the commitment to maintain separate operations during the interim period – would mitigate even the potential for impact on the underlying goals of the TV duopoly and radio-TV cross-ownership rules during the brief waiver period. As set forth in more detail in Attachments 1-4 hereto, the 37th ranked San Antonio DMA achieves a level of media diversity similar to or greater than markets in which the FCC previously has granted temporary duopoly waivers.<sup>10</sup>

It is noteworthy, moreover, that the current video marketplace faces dramatically increased competition from multi-channel video programming distributors. Last year, for example, the FCC found that “almost all consumers have the choice between over-the-air broadcast television, a cable service, and at least two DBS providers.”<sup>11</sup> Broadcast television

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<sup>9</sup> Compare, e.g., *Fox/Chris-Craft* at 14989 (24-month waiver of the newspaper/broadcast cross-ownership rule); *Capital Cities/ABC, Inc.*, 11 FCC Rcd 5841, 5862 (18-month waiver of broadcast television multiple ownership rule); *NBC/Telemundo* at 6978 (12-month waiver of broadcast television multiple ownership rule).

<sup>10</sup> See, e.g., *Applications for Transfer of Control of the Liberty Corporation*, 21 FCC Rcd 244, 245 (2006) (noting markets where two, three, and five independent television voices would exist for the brief waiver period); see also *Applications of AFLAC Broadcasting Group, Inc.*, 12 FCC Rcd 3907 (1997) (“*AFLAC Order*”) (temporary waiver in Hattiesburg-Laurel DMA, the 168th ranked DMA, where during the divestiture period there would be only one independent television voice in the DMA, and in the Savannah DMA, the 98th ranked DMA, where during the divestiture period there would be six independent television voices); *Maltz*, 13 FCC Rcd 15527 (temporary waiver in Toledo, Ohio, then the 66th ranked DMA).

<sup>11</sup> Twelfth Annual Report, *Annual Assessment of the Status of Competition in Markets for the Delivery of Video Programming*, 21 FCC Rcd 2503, 2506 (2006) (“*Twelfth Annual Report*”). Compare Fourth Annual Report, *Annual Assessment of the Status of Competition in Markets for the Delivery of Video Programming*, 13 FCC Rcd 1034, 1039 (1998). In June 1997, 73.6 million households subscribed to cable and direct-to-home satellite television services; as of June 2005, that number was greater than 109.6 million. *Twelfth Annual Report* at 2506. Further, consumers in some areas “may have access to video programming delivered by emerging technologies, such (continued...) ”

faces unprecedented competition from other video programming sources, and the Commission has found that “broadcast television stations’ audience shares have continued to fall as cable and DBS penetration, the number of cable channels, and the number of non-broadcast networks continue to grow.”<sup>12</sup> Moreover, MVPDs have begun to supplement the locally-oriented and locally-originated programming already provided by over-the-air broadcasters to their communities.<sup>13</sup>

Notably, neither TVA nor PEP presently operates any broadcast station, nor does either entity have a controlling interest in any broadcast licensee, in the San Antonio market. PEP holds only a minority interest in Univision, which operates stations in this market. The circumstances of this transaction substantially minimize even the potential for impact on diversity in these markets during the brief waiver period.

Nonetheless, as a further safeguard to preserve media diversity in San Antonio, during the waiver period TVA will maintain the separate management, programming and sales operations of WOAI-TV. Moreover, TVA will continue the strong level of localism and local discretion that is a tradition at that station. The FCC frequently has noted that this sort of

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as digital broadcast spectrum, fiber to the home, or video over the Internet.” *Id.* at 2506. New technology means that consumers “are now able to maintain more control over what, when, and how they receive information. Further, MVPDs of all stripes are offering nonvideo services in tandem with their traditional video services.” *Id.*

<sup>12</sup> *Twelfth Annual Report* at 2550.

<sup>13</sup> *Id.* at 2521.

commitment to continue independent operations provides a strong additional basis for grant of a temporary waiver.<sup>14</sup>

San Antonio, home of the 37th largest television market in the country, enjoys a high degree of diverse media voices and media competition. It is the 7th most populous city in the United States and the second most populous in the State of Texas. According to a 2005 United States Census estimate, the city had a population of more than 1.2 million people.<sup>15</sup> According to Nielsen, the San Antonio DMA itself had a population of over 2.1 million people by the end of 2005.<sup>16</sup>

The San Antonio market is served by 14 full-power television stations, licensed to 11 independent entities.<sup>17</sup> These stations include affiliates of every major television network, as well as stations serving the market's extensive Latino community with programming from Telemundo, Univision, Viacom's MTV Tr3s, and other sources. Low-power and Class A stations provide additional programming to viewers.

San Antonio also enjoys a vibrant and diverse radio market (designated by Arbitron as the San Antonio, Texas Metro, the 13th-largest in the nation).<sup>18</sup> The San Antonio Metro is home to 52 radio stations, which are collectively controlled by 22 independent

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<sup>14</sup> See *NBC/Telemundo*, 17 FCC Rcd at 6976. *Accord Guy Gannett*, 14 FCC Rcd at 6215-16; *Maltz*, 13 FCC Rcd ¶¶ 9, 13; *Paxson Communications*, 13 FCC Rcd 15518 ¶ 6.

<sup>15</sup> U.S. Bureau of the Census, "San Antonio city, Texas - Fact Sheet," American Factfinder (2005), available at <http://factfinder.census.gov/>.

<sup>16</sup> *Television Yearbook*, BIA Financial Network (2006).

<sup>17</sup> See Attachment 1.

<sup>18</sup> See Attachment 2.

entities.<sup>19</sup> San Antonio residents also receive radio service from the two national satellite radio providers, Sirius and XM Radio. In addition to the nearly 200 channels of mainstream and niche music, news, talk, and sports programming each offered by Sirius and XM Radio, San Antonio subscribers enjoy access to local traffic and emergency information through XM's NavTraffic real-time traffic service.<sup>20</sup>

The market is home to 41 newspapers, which provide local, national, and international news and information to the English- and Spanish-speaking communities in greater San Antonio.<sup>21</sup> The largest daily newspaper, *The San Antonio Express-News*, is circulated to 222,800 local households.<sup>22</sup>

San Antonio is also well served by multi-channel video programming distributors ("MVPDs"). Over 91% of the television households in the market receive MVPD service.<sup>23</sup> The largest proportion of these households – 61% of television households in the market – subscribes to one of the 39 cable systems, owned by 10 cable operators, that serve the market.<sup>24</sup> Additionally, both of the national DBS providers, EchoStar and DIRECTV, provide local-into-local delivery of San Antonio broadcast television stations to their San Antonio-area subscribers.

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<sup>19</sup> *Id.*

<sup>20</sup> See XM Radio, Press Release, "XM NavTraffic Real-Time Traffic Service Expands to 50 Markets" (Mar. 28, 2007), available at [http://xmradio.mediaroom.com/index.php?s=press\\_releases&item=1436](http://xmradio.mediaroom.com/index.php?s=press_releases&item=1436).

<sup>21</sup> See Attachment 3.

<sup>22</sup> *Id.*

<sup>23</sup> See Television Bureau of Advertising, "Cable and ADS Penetration by DMA," [http://www.tvb.org/rcentral/markettrack/Cable\\_and\\_ADS\\_Penetration\\_by\\_DMA.asp](http://www.tvb.org/rcentral/markettrack/Cable_and_ADS_Penetration_by_DMA.asp) (Feb. 2007); Attachment 4.

<sup>24</sup> *Id.*

Through their relationships with national and international content providers, both EchoStar and DIRECTV add further diversity to the market by providing substantial additional content serving San Antonio's various national and ethnic communities, including native content from a wide variety of European and Latin American countries.

Given the extensive media penetration in San Antonio and the diversity of media voices that would remain after the transaction, grant of a 6-month waiver accords with FCC precedent and serves the public interest by facilitating the prompt consummation of the proposed multi-station, multi-market transaction and an orderly process for achieving compliance with the FCC's ownership rules.

**ATTACHMENT 1**  
**FULL-POWER TELEVISION STATIONS**  
**SAN ANTONIO, TX**

**TV Stations in the San Antonio DMA (#37)**  
(Source: TV & Cable Factbook 2007 and FCC CDBS Database)

<b><u>Station Count</u></b>	<b><u>Station Call Sign (FCC Facility ID)</u></b>	<b><u>Channel (Network)</u></b>	<b><u>Community of License</u></b>	<b><u>Licensee (Owner)</u></b>
<b>1</b>	WOAI-TV (69618)	4/58 (NBC)	San Antonio, TX	CCB Texas Licenses, LP (Clear Channel Communications Inc.)
<b>2</b>	KENS-TV (26304)	5/55 (CBS)	San Antonio, TX	KENS-TV, Inc. (Belo Corp.)
	KCWX (24316) (LMA with KVUE, Austin, TX)	2/None (CW)	Fredricksburg, TX	Corridor Television LLP (Saleem Tawil- 50% and Carmen Tawil-50%)
<b>3</b>	KSAT-TV (53118)	12/48 (ABC)	San Antonio, TX	Post-Newsweek Stations San Antonio LP (Post-Newsweek Stations Inc.)
<b>4</b>	KABB (56528) (LMA with KMYS)	29/30 (FOX)	San Antonio, TX	KABB Licensee LLC (Sinclair Broadcast Group, Inc.)
	KMYS (51518) (LMA with KABB)	35/32 (MNT)	Kerrville, TX	San Antonio (KRRT-TV) Licensee Inc. (Sinclair Broadcast Group, Inc.)
<b>5</b>	KWEX-TV (35881)	41/39 (UNI)	San Antonio, TX	KWEX License Partnership, LP (Univision Communications Inc.)
	KNIC-TV (125710)	17/None (TEL)	Blanco, TX	Univision Television Group, Inc. (Univision Communications Inc.)
<b>6</b>	KVDA (64969)	60/38 (TMO)	San Antonio, TX	NBC Telemundo License Co. (General Electric Company)
<b>7</b>	KVAW (32621)	16/18 (MTV-3)	Eagle Pass, TX	Dr. Joseph A. Zavaletta (Same)
<b>8</b>	KPXL	26/None	Uvalde, TX	Paxson San Antonio License, Inc.

	(61173)	(ION)		(ION Media Networks Inc.)
<b>9</b>	KHCE (27300)	23/16 (TBN)	San Antonio, TX	San Antonio Community Educational TV Inc. (Same)
<b>10</b>	KLRN (749)	9/8 (PBS)	San Antonio, TX	Alamo Public Telecommunications Council (Same)
<b>11</b>	KTRG (55762)	10/28 (IND)	Del Rio, TX	Ortiz Broadcasting Corp. (Same)

**ATTACHMENT 2**  
**RADIO STATIONS (BIA)<sup>1</sup>**  
**SAN ANTONIO, TX**

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<sup>1</sup> BIA Financial Network data for the radio market is on file in connection with the pending Form 315 application for the transfer of control of the broadcast stations licensed to subsidiaries of Clear Channel Communications, Inc. from Shareholders of Clear Channel Communications, Inc. to Stockholders of BT Triple Crown Merger Co., Inc., File Nos. BTCH-20061212AVS *et al.* (as amended Jan. 17, 2007).



San Antonio, TX (#30)

Market Name	Calls	AM or FM	FCC ID Number	City of License	State of License	Parent	Comments
San Antonio, TX	KRDY	AM	26310	San Antonio	TX	ABC/Disney	
San Antonio, TX	KMFR	FM	21674	Hondo	TX	Barger, John	
San Antonio, TX	KBRN	AM	51961	Boerne	TX	Benavides, Gerald G.	
San Antonio, TX	KYFS	FM	51115	San Antonio	TX	Bible Broadcasting Network	
San Antonio, TX	KFNI	AM	55415	Pleasanton	TX	Border Media Partners LLC	Approved sale to La Promesa Foundation
San Antonio, TX	KLEV	FM	55414	Jourdanton	TX	Border Media Partners LLC	
San Antonio, TX	KPHO	FM	83596	Pearsall	TX	Border Media Partners LLC	
San Antonio, TX	KSAH	AM	23072	Universal City	TX	Border Media Partners LLC	
San Antonio, TX	KTFM	FM	2543	Floresville	TX	Border Media Partners LLC	
San Antonio, TX	KZDC	AM	65330	San Antonio	TX	Border Media Partners LLC	
San Antonio, TX	KJXK	FM	71086	San Antonio	TX	CBS Corp	Approved sale to Border Media Partners, Inc.
San Antonio, TX	KTSA	AM	71087	San Antonio	TX	CBS Corp	Approved Sale to Border Media Partners, LLC
San Antonio, TX	KAJA	FM	11919	San Antonio	TX	Clear Channel Communications	
San Antonio, TX	KOXT	FM	11962	San Antonio	TX	Clear Channel Communications	
San Antonio, TX	KRPT	FM	25904	Davine	TX	Clear Channel Communications	
San Antonio, TX	KTKR	AM	11945	San Antonio	TX	Clear Channel Communications	
San Antonio, TX	KXXM	FM	28668	San Antonio	TX	Clear Channel Communications	
San Antonio, TX	WOAI	AM	11952	San Antonio	TX	Clear Channel Communications	
San Antonio, TX	KCYV	FM	48718	San Antonio	TX	Cox Enterprises Inc	
San Antonio, TX	KPWT	FM	70357	Terrell Hills	TX	Cox Enterprises Inc	
San Antonio, TX	KISS	FM	34976	San Antonio	TX	Cox Enterprises Inc	
San Antonio, TX	KKYX	AM	48723	San Antonio	TX	Cox Enterprises Inc	
San Antonio, TX	KONO	FM	50030	Helotes	TX	Cox Enterprises Inc	
San Antonio, TX	KONO	AM	50029	San Antonio	TX	Cox Enterprises Inc	
San Antonio, TX	KSMG	FM	34977	Seguin	TX	Cox Enterprises Inc	
San Antonio, TX	KEDA	AM	14892	San Antonio	TX	D & E Broadcasting	

Market Name	CALLS	AM or FM	FCC ID Number	City of License	State of License	Parent	Comments
San Antonio, TX	KGLF	FM	87230	Doss	TX	Educational Media Foundation	
San Antonio, TX	KZLV	FM	86441	Lyle	TX	Educational Media Foundation	
San Antonio, TX	KBIB	AM	27303	Marion	TX	Hispanic Community College	
San Antonio, TX	KCWM	AM	21673	Hondo	TX	Hondo Communications Incorporated	
San Antonio, TX	KEEP	FM	30106	Bandera	TX	J & J Management LLC	
San Antonio, TX	KDRY	AM	47666	Alamo Heights	TX	KDRY Radio Inc	
San Antonio, TX	KZEP	FM	65329	San Antonio	TX	Lotus Communications Corp	
San Antonio, TX	KSLJ	AM	210	Somerset	TX	Marantha Broadcasting	LMA with Clear Channel Communications
San Antonio, TX	KCHL	AM	40486	San Antonio	TX	Marin Broadcasting Inc	
San Antonio, TX	KGNB	AM	48378	New Braunfels	TX	New Braunfels Communications	
San Antonio, TX	KNBT	FM	48377	New Braunfels	TX	New Braunfels Communications	
San Antonio, TX	KLUP	AM	34975	Terrell Hills	TX	Salem Communications Corporation	
San Antonio, TX	KSLR	AM	58634	San Antonio	TX	Salem Communications Corporation	
San Antonio, TX	KSYM	FM	58788	San Antonio	TX	San Antonio College	
San Antonio, TX	KWED	AM	52671	Seguin	TX	Seguin Media Group Ltd	
San Antonio, TX	KPAC	FM	65335	San Antonio	TX	Texas Public Radio	
San Antonio, TX	KSTX	FM	65334	San Antonio	TX	Texas Public Radio	
San Antonio, TX	KRTU	FM	68128	San Antonio	TX	Trinity University	
San Antonio, TX	KROM	FM	67071	San Antonio	TX	Univision Communications Corp.	Proposed Sale to Broadcasting Media Partners Inc.
San Antonio, TX	KXTN	FM	67064	San Antonio	TX	Univision Communications Corp	Proposed Sale to Broadcasting Media Partners Inc.
San Antonio, TX	KABL	AM	67070	San Antonio	TX	Univision Communications Inc	Proposed Sale to Broadcasting Media Partners Inc.
San Antonio, TX	KBBT	FM	3075	Schertz	TX	Univision Communications Inc	Proposed Sale to Broadcasting Media Partners Inc.
San Antonio, TX	KCOR	AM	67069	San Antonio	TX	Univision Communications Inc	Proposed Sale to Broadcasting Media Partners Inc.
San Antonio, TX	KCOR	FM	25469	Comfort	TX	Univision Communications Inc	Proposed Sale to Broadcasting Media Partners Inc.
San Antonio, TX	KLTO	FM	25568	McQueeney	TX	Univision Communications Inc	Proposed Sale to Broadcasting Media Partners Inc.
San Antonio, TX	KWCB	FM	72878	Floresville	TX	Wilson County Educational Foundation Inc	

Data taken from BIA's MEDIA Access Pro™, December 6, 2006  
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**ATTACHMENT 3  
NEWSPAPERS  
SAN ANTONIO, TX**

## **Newspaper Market: San Antonio**

<b>Newspaper Market Summary:</b>		
	<b><u>Total Circulation</u></b>	<b><u>Total Penetration</u></b>
<b>Dailies</b>	252,300	33.2
<b>Sunday</b>	384,800	50.6
<b>Weeklies</b>	363,683	47.8
<b>Number of Households: 760,000</b>		

### **Daily Newspapers Published in DMA**

	<b>Title</b>	<b>City</b>	<b>M-F Circulation (Total)</b>	<b>Mkt. Penetration</b>	<b>Sunday Circulation (Total)</b>	<b>Mkt. Penetration</b>
1	<i>San Antonio Express-News</i>	San Antonio	222,800	29.3	350,500	46.1
2	<i>Kerrville Daily Times</i>	Kerrville	11,000	1.4	12,000	1.6
3	<i>New Braunfels Herald Zeitung</i>	New Braunfels	7,500	1.0	9,800	1.3
4	<i>Del Rio News-Herald</i>	Del Rio	6,000	0.8	6,000	0.8
5	<i>Seguin Gazette-Enterprise</i>	Seguin	5,000	0.7	6,500	0.9

**Source:** BIA: Investing in Newspaper 2006

Weekly Newspapers Published in DMA: San Antonio

	Title	City	Weekly Circulation (Total)	Mkt. Penetration	Sunday Circulation (Total)	Mkt. Penetration
1	<i>Bandera Bulletin</i>	Bandera	4,000	0.5	N/A	N/A
2	<i>Bandera Review</i>	Bandera	3,500	0.5	N/A	N/A
3	<i>Boerne Star/Hill Country Recorder</i>	Boerne	7,500	1.0	N/A	N/A
4	<i>Brackett News</i>	Bracketville	1,000	0.1	N/A	N/A
5	<i>Bulverde Standard</i>	Bulverde	2,000*	0.3	N/A	N/A
6	<i>Canyon Lake Week</i>	Canyon Lake	1,000*	0.1	N/A	N/A
7	<i>Carrizo Springs Javelin</i>	Carrizo Springs	1,700	0.2	N/A	N/A
8	<i>Cornal County Beacon</i>	Cornal County	500*	0.1	N/A	N/A
9	<i>Countywide</i>	Karnes City	4,000	0.5	N/A	N/A
10	<i>The Cuero Record</i>	Cuero	6,500	0.9	N/A	N/A
11	<i>The Devine News</i>	Devine	3,800	0.5	N/A	N/A
12	<i>Eagle Pass News-Guide &amp; Sunday News</i>	Eagle Pass	4,300	0.6	N/A	N/A
13	<i>The Echo</i>	Helotes	2,700	0.4	N/A	N/A
14	<i>Floresville Chronicle-Journal</i>	Floresville	8,000	1.1	N/A	N/A
15	<i>Frio-Nueces Current</i>	Pearsall	4,300/75*	0.6	N/A	N/A
16	<i>Gonzales Inquirer</i>	Gonzales	4,000	0.5	N/A	N/A
17	<i>Hallettsville Tribune-Herald</i>	Lavaca	38,250	5.0	N/A	N/A
18	<i>Herald-Times</i>	Yoakum	3,200	0.4	N/A	N/A
19	<i>Hondo Anvil Herald</i>	Hondo	5,269	0.7	N/A	N/A
20	<i>La Vernia News</i>	La Vernia	1,800/100*	0.2	N/A	N/A
21	<i>Medina Valley Times</i>	Devine	3,300	0.4	N/A	N/A
22	<i>The Moulton Eagle</i>	Moulton	1,300	0.2	N/A	N/A
23	<i>The Mountain Sun</i>	Kerrville	5,000*	0.7	N/A	N/A
24	<i>The News Bulletin</i>	Castroville	3,000	0.4	N/A	N/A
25	<i>North San Antonio Times</i>	San Antonio	45,000*	5.9	N/A	N/A
26	<i>North Side Recorder-Times</i>	San Antonio	83,000*	10.9	N/A	N/A
27	<i>Pleasanton Express</i>	Pleasanton	8,400	1.1	N/A	N/A
28	<i>Sabinal Sampler</i>	Sabinal	600*	0.1	N/A	N/A
29	<i>The Shiner Gazette</i>	Shiner	2,800/47*	0.4	N/A	N/A
30	<i>Texan Express</i>	Goliad	2,167	0.3	N/A	N/A
31	<i>The Texas Mohair Weekly</i>	Rocksprings	1,200	0.2	N/A	N/A
32	<i>Times Guardian/Chronicle</i>	Canyon Lake	3,000	0.4	N/A	N/A
33	<i>Uvalde Leader-News</i>	Uvalde	6,100	0.8	N/A	N/A
34	<i>Wilson County News</i>	Floresville	6,500	0.9	N/A	N/A
35	<i>Yorktown News</i>	Yorktown	2,700/75*	0.4	N/A	N/A
36	<i>Zavala County Sentinel</i>	Crystal City	2,300	0.3	N/A	N/A

Source: BIA: Investing in Newspaper 2006

\*Indicates free publication

**ATTACHMENT 4  
CABLE TELEVISION SYSTEMS  
SAN ANTONIO, TX**

**San Antonio, Texas DMA**

**Cable Television Systems**

**Cable Market Summary** <sup>1/</sup>

Cable TV	485,140
Households	
Cable Penetration <sup>2/</sup>	61%
Alternate Delivery	24%
Systems (including DBS, SMATV, and MDS) Penetration <sup>3/</sup>	
Counties in DMA	Atascosa, Bandera, Bexar, Comal, DeWitt, Dimmit, Edwards, Frio, Goliad, Gonzales, Guadalupe, Karnes, Kendall, Kerr, Kinney, La Salle, Lavaca, Maverick, McMullen, Medina, Real, Uvalde, Val Verde, Wilson & Zavala.

**Cable Systems in DMA** <sup>4/</sup>

	Cable Company	Community	County or Counties	No. Channels	Homes Passed	Number of Subscribers
1	Rapid Cable	Adkins	Bexar	54	1,099	101
2	Rapid Cable	Atascosa	Bexar	54	1,338	182
3	Charter Communications	Batesville	Zavala	37	313	149
4	Charter Communications	Big Wells	Dimmit	37	313	177
5	Guadalupe Valley Communications	Boerne	Bexar & Kendall	60	6,500	4,480
6	Charter Communications	Bracketville	Kinney	Not Available	1,185	508
7	Guadalupe Valley Communications	Canyon Lake	Comal	35	5,500	2,957

<sup>1/</sup> Source: *Broadcasting & Cable Yearbook 2006*

<sup>2/</sup> Source: TVB.org Market Track, Cable and ADS Penetration by DMA, February 2007

<sup>3/</sup> Source: TVB.org Market Track, Cable and ADS Penetration by DMA, February 2007

<sup>4/</sup> Source: *Television & Cable Factbook 2007*

**TV Acquisition LLC  
FCC Form 314**

**Exhibit 15  
Attachment 4  
Page 2**

8	Rapid Cable	Center Point	Kerr & Panola	61	640	283
9	Time Warner Cable	Charlotte	Atascosa	26	488	Included in
10	Time Warner Cable	Crystal City	Dimmit & Zavala	Not Available	4,474	Del Rio 4,144 (Included in Del Rio) Not Available
11	Time Warner Cable	Del Rio	Val Verde	60	3,333	Not Available
12	Charter Communications	Devine	Atascosa & Medina	Not Available	2,786	663
13	Time Warner Cable	Eagle Pass	Maverick	Not Available	Not Available	Included in Del Rio
14	Time Warner Cable	Encinal	La Salle	Not Available	308	Included in Del Rio Not Available
15	Clear Vu Cable	Floresville	Wilson	35	1,850	7,602
16	Time Warner Cable	Gonzales	DeWitt, Gonzales & Lavaca	Not Available	10,777	(Includes Columbus)
17	Charter Communications	Hondo	Medina	30	1,375	1,213
18	Suddenlink Communications	Ingram	Kerr	41	2,274	1,946
19	Rapid Cable	Kenedy	Karnes	41	2,412	895
20	Time Warner Cable	Kerrville	Kerr	Not Available	14,059	11,000
21	CMA Cablevision	La Grange	Colorado, Fayette, Lavaca & Lee	Not Available	9,820	500
22	Charter Communications	La Pryor	Zavala	Not Available	459	196
23	Rapid Cable	Las Gallinas	Bexar	54	2,138	246
24	Comfort Cable Co.	Lavernia	Wilson	Not Available	660	119
25	Rapid Cable	Nixon	Gonzales	36	724	184
26	Time Warner Cable	Pearsall	Frio & La Salle	Not Available	5,086	Included in Del Rio
27	Charter Communications	Pleasanton	Atascosa	Not Available	2,138	1,981
28	Time Warner Cable	Poteet	Atascosa	35	1,839	Included in Del Rio
29	Time Warner Cable	Quemado	Maverick	Not Available	Not Available	Included in Del Rio
30	Rapid Cable	Rocksprings	Edwards	22	570	27
31	Rapid Cable	Runge	Karnes	41	450	95
32	Charter Communications	Sanibal	Uvalde	Not Available	522	232
33	Grande Communications	San Antonio	Bexar	75	Not Available	Not Available
34	Time Warner Cable	San Antonio	Bexar, Comal, Guadalupe & Medina	Not Available	640,390	220,323
35	US Cable of Coastal Texas LP	Seminole	Chaves, NM; Brewster, Culberson, Gaines,	60	22,206	1,727

			Pecos, Terrell, Upton & Val Verde Lavaca	Not Available	946	737
36	Charter Communications	Shiner				
37	Charter Communications	Tilden	McMullen	37	97	49
38	Time Warner Cable	Uvalde	Uvalde	Not Available	7,425	Included in Del Rio
39	Rapid Cable	Yorktown	DeWitt	41	1,000	427