

Multiple Ownership

The instant application is one of a series of applications seeking the Commission's consent to the transfer of control of the licensees of the following broadcast television and radio stations, along with associated non-broadcast licenses, to TEGNA Inc. ("TEGNA," and such transfers, the "Transaction"):

Station	Market	Licensee	Transferor
WBNS-TV	Columbus, OH	WBNS TV, Inc.	The Dispatch Printing Company Voting Trust
WBNS(AM) WBNS-FM	Columbus, OH	RadiOhio Incorporated	ROI Holdings LLC
WTHR(TV)	Indianapolis, IN	VideoIndiana, Inc.	The Dispatch Printing Company Voting Trust
WALV-CD	Indianapolis, IN	VideOhio, Inc.	The Dispatch Printing Company Voting Trust

Pursuant to the agreements attached as Exhibit 15 to the relevant applications, each of WBNS TV, Inc., VideoIndiana, Inc., and RadiOhio Incorporated will become a direct, wholly owned subsidiary of TEGNA upon consummation of the Transaction. VideOhio, Inc., will remain a direct, wholly owned subsidiary of VideoIndiana, Inc., and thus will become an indirect subsidiary of TEGNA upon the Transaction's consummation. Charts illustrating the stations' pre- and post-Transaction ownership structure are provided in Attachment 1.

The proposed transfers of control comply with the Commission's rules governing local and national television ownership and local radio ownership.¹ With respect to the Commission's 39 percent cap on national television audience reach,² Attachment 2 attached hereto shows that,

¹ See 47 C.F.R. § 73.3555(a), (b), (e).

² 47 C.F.R. § 73.3555(e).

upon consummation of the Transaction and the assignment of the licenses TEGNA separately proposes to acquire (through designated subsidiaries) in connection with the pending Nexstar/Tribune transaction,³ TEGNA's national audience reach would be about 31.811 percent as calculated under the Commission's existing rules and 38.853 percent without including the UHF discount in the calculation. Both figures are below the 39 percent cap.

With respect to the Commission's local television and local radio ownership rules,⁴ TEGNA holds no existing attributable interests in any television or radio stations in the Columbus, Ohio, or Indianapolis, Indiana, markets. TEGNA proposes to acquire control of only one full power television station in each market, and of only two radio stations in the Columbus, Ohio, market (one AM and one FM). Such ownership interests are permitted in all markets under the local television and local radio ownership rules.

Accordingly, grant of the instant transfer of control applications would comply with the Commission's rules governing local and national television ownership and local radio ownership.

³ See *Media Bureau Accepts for Filing Divestiture Applications in Proceeding to Transfer Control of Tribune Media Company to Nexstar Media Group, Inc., and Establishes Consolidated Pleading Cycle*, Public Notice, MB Docket No. 19-30, DA 19-341, at Attachment A (MB April 26, 2019).

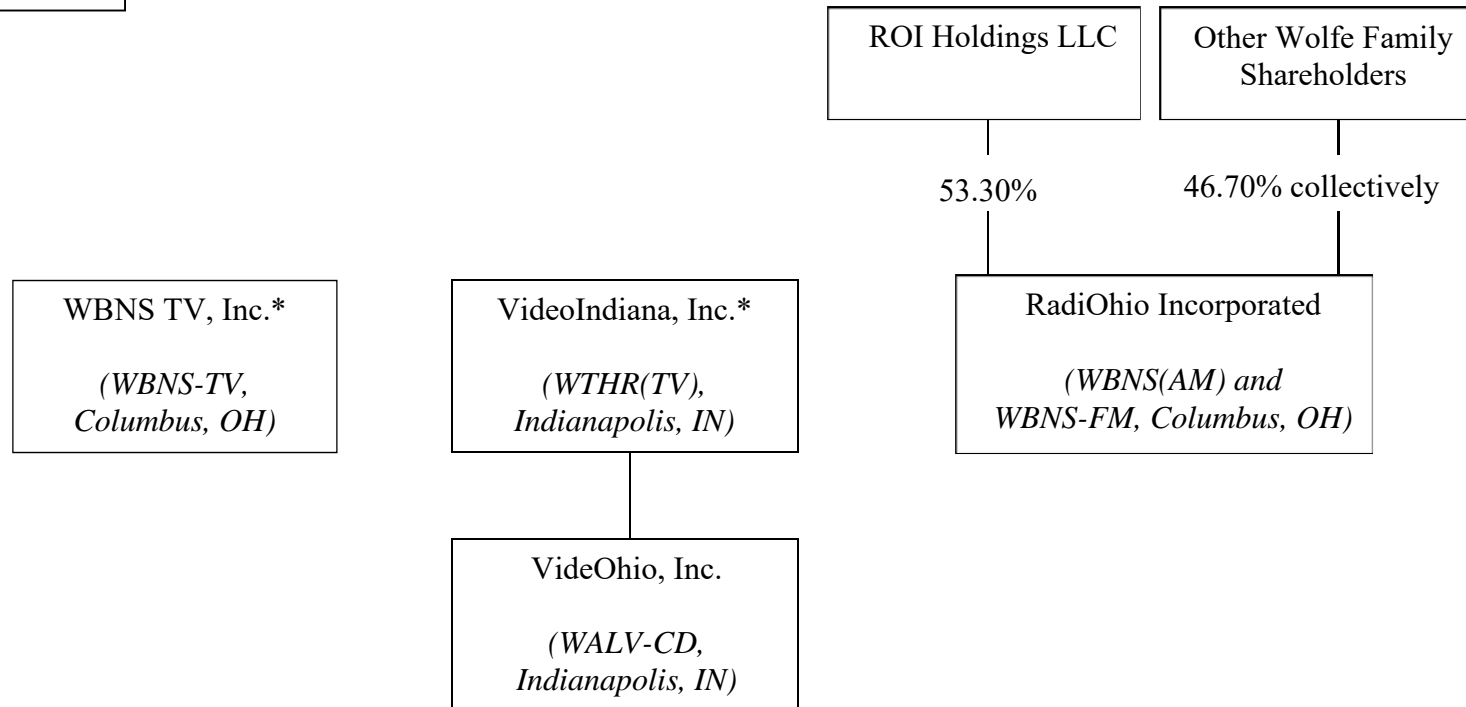
⁴ 47 C.F.R. § 73.3555(a), (b).

Attachment 1

Pre- and Post-Transaction Structure

Before

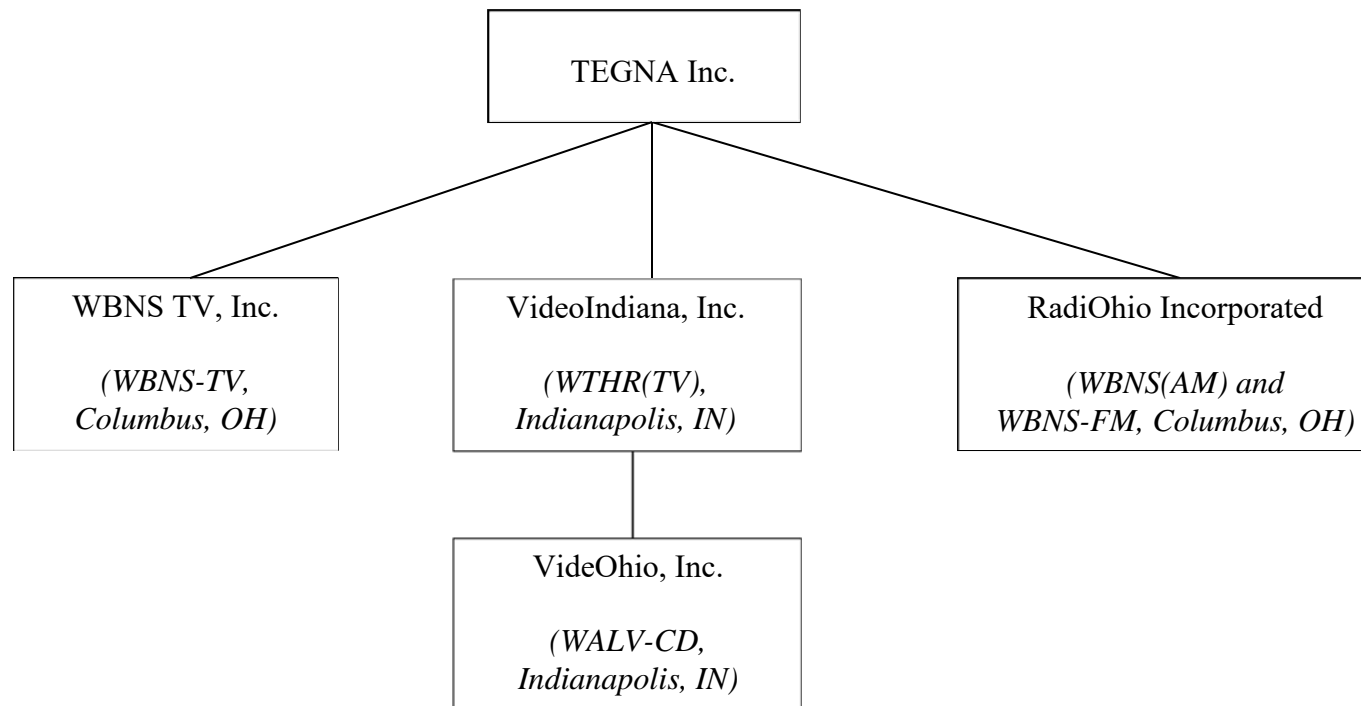
NOTE: All ownership is 100% unless otherwise indicated.



* Nearly all of the issued and outstanding voting stock (99.8 percent) of this entity is voted pursuant to the terms of The Dispatch Printing Company Voting Trust. Co-trustees: Michael J. Fiorile, Bradley L. Campbell, Sara W. Perrini, Ann I. Wolfe, and Katherine I. Wolfe.

After

NOTE: All ownership is
100% unless otherwise
indicated.



Attachment 2

TEGNA National Television Audience Reach

TEGNA Post-Transaction National Audience Reach

RANK	DMA NAME	CALL LETTERS	BAND	AFFIL	TV HOMES	% OF US
5	Dallas	WFAA	VHF	ABC	2,622,070	2.38%
6	Washington, DC	WUSA	VHF	CBS	2,482,480	2.25%
7	Houston	KHOU	VHF	CBS	2,423,360	2.20%
10	Atlanta	WXIA	VHF	NBC	2,341,390	2.12%
		WATL	UHF	MYN		
11	Tampa	WTSP	VHF	CBS	1,875,420	1.70%
12	Phoenix	KPNX	VHF	NBC	1,864,420	1.69%
		KNAZ	UHF	NBC		
13	Seattle	KING	UHF	NBC	1,854,810	1.68%
		KONG	UHF	IND		
15	Minneapolis	KARE	VHF	NBC	1,713,310	1.55%
17	Denver	KUSA	VHF	NBC	1,585,270	1.44%
		KTVB	UHF	MYN		
19	Cleveland	WKYC	UHF	NBC	1,399,470	1.27%
20	Sacramento	KXTV	VHF	ABC	1,357,690	1.23%
21	St. Louis	KSDK	UHF	NBC	1,164,400	1.06%
22	Portland, OR	KGW	VHF	NBC	1,141,770	1.04%
23	Charlotte	WCNC	UHF	NBC	1,129,900	1.02%
28	Indianapolis	WTHR	VHF	NBC	999,790	0.91%
29	San Diego	KFMB	VHF	CBS / CW	987,760	0.90%
31	San Antonio	KENS	UHF	CBS	923,990	0.84%
33	Hartford-New Haven, CT	WTIC	UHF	FOX	897,870	0.81%
		WCCT	UHF	CW		
34	Columbus, OH	WBNS-TV	UHF	CBS	889,600	0.81%
40	Austin	KVUE	UHF	ABC	751,650	0.68%
41	Harrisburg-Lancaster-Lebanon-York, PA	WPMT	UHF	FOX	705,190	0.64%
42	Jacksonville	WTLV	VHF	NBC	681,330	0.62%
		WJXX	VHF	ABC		
44	Norfolk	WVEC	VHF	ABC	678,210	0.62%
46	Greensboro	WFMY	UHF	CBS	675,130	0.61%
48	Louisville	WHAS	VHF	ABC	647,190	0.59%
49	Grand Rapids	WZZM	VHF	ABC	639,410	0.58%
50	New Orleans	WWL	UHF	CBS	624,020	0.57%
		WUPL	UHF	MYN		
51	Memphis, TN	WLMT	UHF	CW	623,390	0.57%
		WATN	UHF	ABC		

Transfer of Control Application
FCC Form 315
Exhibit 20, Attachment 2

		CALL				
RANK	DMA NAME	LETTERS	BAND	AFFIL	TV HOMES	% OF US
52	Buffalo	WGRZ	UHF	NBC	586,930	0.53%
57	Little Rock	KTHV	VHF	CBS	527,090	0.48%
60	Knoxville	WBIR	VHF	NBC	512,160	0.46%
62	Wilkes Barre-Scranton, PA	WNEP	UHF	ABC	481,390	0.44%
71	Toledo	WTOL	VHF	CBS	401,510	0.36%
73	Tucson	KMSB	UHF	FOX	392,920	0.36%
74	Columbia, SC	WLTX	UHF	CBS	389,590	0.35%
75	Des Moines-Ames, IA	WOI	VHF	ABC	383,590	0.35%
		KCWI	UHF	CW		
77	Spokane	KREM	UHF	CBS	382,690	0.35%
		KSKN	UHF	CW		
79	Huntsville-Decatur-Florence, AL	WZDX	UHF	FOX	372,770	0.34%
84	Portland, ME	WCSH	UHF	NBC	339,980	0.31%
89	Waco	KCEN	VHF	NBC	322,820	0.29%
98	Davenport, IA-Rock Island-Moline, IL	WQAD	UHF	ABC	280,420	0.25%
100	Boise	KTVB	VHF	NBC	273,500	0.25%
101	Ft. Smith-Fayetteville-Springdale-Rogers, AR	KFSM	UHF	CBS	272,240	0.25%
114	Tyler	KYTX	UHF	CBS / CW	232,180	0.21%
118	Macon	WMAZ	VHF	CBS / CW	224,180	0.20%
128	Corpus Christi	KIII	VHF	ABC	193,070	0.18%
140	Beaumont	KBMT	VHF	ABC / NBC	152,710	0.14%
142	Odessa-Midland	KWES	VHF	NBC	150,430	0.14%
155	Bangor	WLBZ	VHF	NBC	124,190	0.11%
165	Abilene	KXVA	UHF	FOX	104,440	0.09%
196	San Angelo	KIDY	UHF	FOX	52,790	0.05%
TEGNA TOTAL			Discounted		35,070,000	31.811%
(Post-Transaction)			Undiscounted		42,833,880	38.853%
TOTAL US HOUSEHOLDS					110,244,650	100.000%

Source: The Nielsen Company (US), LLC, Local Television Market Universe Estimates (Sept. 22, 2018)

 = Transfer of control proposed in instant applications

 = Assignment proposed in connection with Nexstar/Tribune transaction