

Exhibit 14

Multiple Ownership

The instant application proposes acquisition of WBPG(TV), Gulf Shores, AL, which is in the Mobile (AL)-Pensacola (FL) Nielsen DMA. Because the station will be under common ownership with WALA-TV, Mobile, AL, which is also in the Mobile-Pensacola DMA, and because the predicted Grade B contours of the stations overlap, the transaction implicates Section 73.3555(b), the Local Television Multiple Ownership Rule. As shown below, common ownership of the two stations is fully consistent with that rule.

Section 73.3555 provides in substance that two television stations located in the same market and having overlapping contours may be commonly owned if (i) at least one of the two is not ranked among the top four stations in the DMA and (ii) at least eight independently owned and operating full-power commercial and noncommercial stations, the Grade B signal contours of which overlap the contours of one of the stations in the proposed combination, will remain in the DMA post-transaction.

The first prong of this test is easily met: Although WALA-TV is among the top-4 rated stations in the market, based on the most recent Nielsen survey, WBPG(TV) is not.¹

The second portion of the test is also met. Attachment A hereto shows that, in addition to WALA-TV and WBPG(TV), there are at least eleven (11) operating full-service commercial and noncommercial television stations in the Mobile-Pensacola market.² Of those, two stations (WJTC(TV) and WPMI(TV)) are already under common ownership, and one station (WFGX(TV)) is subject to a time brokerage agreement (or "LMA"). Subtracting one of the commonly-owned stations, the station subject to an LMA, and WBPG(TV) from the total of 13, ten (10) independently owned and operated stations will remain post-transaction—two more than the eight-station minimum imposed by Section 73.3555(b).

¹ See Nielsen Station Index, May 2002, which lists the top 4 ranked stations in the Mobile-Pensacola DMA, 9:00 AM to midnight, as WKRG, WPMI, WEAR and WALA.

² Attachment A was prepared from trade publications and the Commission's records. As shown in the Engineering Exhibit set forth in Attachment B, all of the stations shown overlap the predicted Grade B contour of WALA-TV and/or WBPG(TV).

ATTACHMENT A

PENSACOLA-MOBILE MARKET TELEVISION VOICE-COUNT

CALL SIGN	CH	AFFIL	COMMUN OF LICENSE	OWNER	LMA	ON AIR	CONTOUR OVERLAP
WALA-TV	10	FOX	Mobile, AL	Emmis Communications Corp.	No	Yes	N/A
WAWD(TV)	58	IND	Fort Walton Beach, FL	Beach TV Properties Inc.	No	Yes	Yes
WBPG(TV)	55	WB	Gulf Shores, AL	Pegasus Communications Corp.	No	Yes	N/A
WEAR-TV	3	ABC	Pensacola, FL	Sinclair Broadcast Group Inc.	No	Yes	Yes
WEIQ(TV)	42	ETV	Mobile, AL	Alabama Educational Television Commission	No	Yes	Yes
WFGX(TV)	35	IND	Fort Walton Beach, FL	Carl Scarlata, Jr.	Yes	Yes	Yes
WHBR(TV)	33	IND	Pensacola, FL	Christian Television Corp. Inc.	No	Yes	Yes
WJTC(TV)	44	UPN	Pensacola, FL	Clear Channel Communications Inc.	No	Yes	Yes
WPMI(TV)	15	NBC	Mobile, AL	Clear Channel Communications Inc.	No	Yes	Yes
WKRG-TV	5	CBS	Mobile, AL	Media General Inc.	No	Yes	Yes
WMPV-TV	21	TBN	Mobile, AL	Trinity Broadcasting Network Inc.	No	Yes	Yes
WPAN(TV)	53	IND	Fort Walton Beach, FL	Franklin Media Inc.	No	Yes	Yes
WSRE(TV)	23	ETV	Pensacola, FL	Pensacola Jr. College District Board of Trustees	No	Yes	Yes

ENGINEERING EXHIBIT

This statement was prepared on behalf of Emmis Television License Corporation ("Emmis"). Emmis is the licensee of television broadcast station WALA-TV Mobile, AL and seeks to acquire the license of television broadcast station WBPG Gulf Shores, AL. Since there is substantial overlap of the Grade B contours of WALA-TV and WBPG a demonstration of compliance with the multiple ownership rules is required.

Attached to this statement is a map showing the Grade B contours of WALA-TV and WBPG along with the transmitter location of several other stations in the area. There are additional television stations located just outside of the WALA-TV Grade B contour that obviously have Grade B contour overlap with WALA-TV and WBPG. As demonstrated on the map of Figure 1 there are more than the required eight additional independent Grade B signals overlapping the composite WALA-TV/WBPG Grade B service area.

The stations identified on the map are tabulated with their licensed facilities on the tabulation attached as Figure 2.

Respectfully submitted,
LOHNES AND CULVER



By D. Scott Turpie

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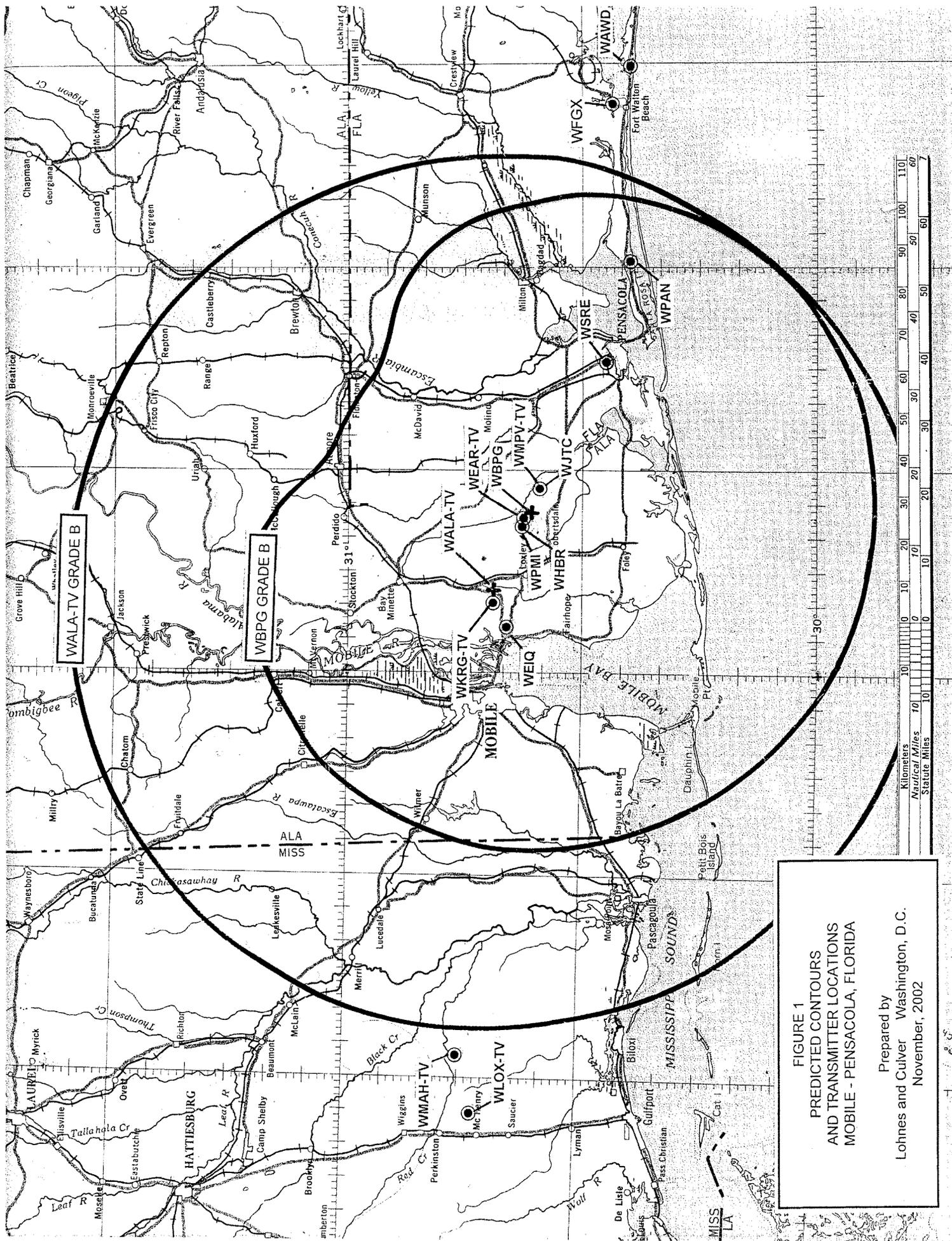


FIGURE 1
PREDICTED CONTOURS
AND TRANSMITTER LOCATIONS
MOBILE - PENSACOLA, FLORIDA

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**FIGURE 2
STATIONS WITH GRADE B
CONTOURS OVERLAPPING WALA-TV/WBPG
COMPOSITE GRADE B SERVICE AREA**

CALL	LOCATION	CHANNEL	ERP (KW)	HAAT(FT)
WALA-TV	MOBILE, AL.	10	316	1362
WBPG	GULF SHORES, AL.	55	3750	1115
WKRQ-TV	MOBILE, AL.	5	100	1906
WEIQ	MOBILE, AL.	42	1170	600
WPMI	MOBILE, AL.	15	5000	1709
WHBR	PENSACOLA, FL.	33	3470	1362
WEAR-TV	PENSACOLA, FL.	3	100	1886
WMPV-TV	MOBILE, AL.	21	4370	1430
WJTC	PENSACOLA, FL.	44	3310	1490
WSRE	PENSACOLA, FL.	23	3020	489
WPAN	FORT WALTON BEACH, FL.	53	3090	719
WAWD	FORT WALTON BEACH, FL.	58	138	177
WFGX	FORT WALTON BEACH, FL.	35	631	197

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