

## COMPLIANCE WITH TELEVISION OWNERSHIP RULES

The instant application seeks consent to the transfer of control of KNTV License, Inc., licensee of television station KNTV, which is located in the San Francisco-Oakland-San Jose DMA, from Granite Broadcasting Corporation to National Broadcasting Company, Inc. ("NBC"). NBC does not currently own a television station in the San Francisco-Oakland-San Jose DMA. However, NBC has an application pending to acquire control of Telemundo Communications Group (FCC File Nos. BTCCT-20011101ABK, *et seq.*). One television station to be acquired in that transaction is KSTS in San Francisco. Common ownership of both KNTV and KSTS complies with the FCC's local ownership rules.

Section 73.355(b) of the Commission's rules permits the common ownership of two full-power television stations in the same DMA if eight independently owned and operating full-power commercial and noncommercial television stations will remain post-merger, and at least one of the two stations to be commonly owned is not ranked among the top four television stations in the DMA based on the most recent all-day (9:00 a.m.-midnight) audience share as measured by Nielsen Media Research.

Based on the Nielsen ratings for the July 2001 sweeps period, neither KNTV nor KSTS was ranked among the top four stations in the market. Specifically, KNTV was ranked number 9 in the market with a 1.8 share; KSTS was ranked number 10 with a 1.4 share.

As set forth in attached chart, after NBC's acquisition of KNTV and KSTS, there will be 18 remaining "independent" television voices in the San Francisco-Oakland-San Jose DMA. Accordingly, NBC's proposed ownership of a duopoly in San Francisco complies with Section 73.3555 (b) of the FCC's Rules.

<b>OWNERS QUALIFIED AS INDEPENDENT VOICE</b> (multiple station group owners qualify as 1 voice)				
<b>Voices</b>	<b>Owner</b>	<b>Affiliation</b>	<b>Call Sign</b>	<b>Channel</b>
1	ABC, Inc.	ABC	KGO	7
1	Ackerley Group	IND	KFTY	50
1	CBS Television	CBS	KPIX	5
0	CBS Television	UPN	KBHK	44
1	Christian Communications	IND	KTLN	68
1	Cox Broadcasting	FOX	KTVU	2
0	Cox Broadcasting	IND	KICU	36
1	Golden Link TV	HSN	KPST	66
0	Granite Broadcasting	WB*	KNTV	11
1	Granite Broadcasting	WB	KBWB	20
1	KQED Inc.	PBS	KQED	9
1	KTEH-TV Foundation	PBS	KTEH	54
1	Lincoln Broadcasting	IND	KTSF	26
1	Minority Television Project	PUB	KMTP	32
1	Pappas Telecasters	IND	KFWU	8
0	Pappas Telecasters	IND	KTNC	42
1	Paxson Communications	PAX	KKPX	65
1	Rural California Broadcasting	PBS	KRCB	22
1	San Mateo County Community College	PBS	KCSM	60
1	Shop At Home (SAH) Acquisition Corp.	IND	KCNS	38
0	Telemundo Group	TEL	KSTS	48
1	Univision Communications	UNI	KDTV	14
1	Young Broadcasting	NBC	KRON	4

\*Note: As of January 1, 2002, KNTV will become the NBC affiliate in this market.