

Local Television Multiple Ownership

The instant FCC 314 application seeks the FCC's consent to the assignment of commercial television station KVOS-TV, Bellingham, Washington (FIN 35862) from Newport Television LLC ("Assignor") to OTA Broadcasting (SEA), LLC ("Assignee"). KVOS-TV is located in the Seattle-Tacoma, Washington DMA and the Assignee is already the licensee of commercial television station KFFV, Seattle, Washington (FIN 49264), which is also located in the Seattle-Tacoma, Washington DMA. The DTV noise-limited service contours of KVOS-TV and KFFV overlap. *See Figure 1*, Coverage Contour Study (attached).

Under Section 73.3555(b) of the Commission's rules, common ownership of two full-power television stations in the same DMA is permitted if eight independently owned and operating full-power commercial and noncommercial television stations will remain in the DMA post-transaction, 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 The Nielsen Company ("Nielsen").¹ As demonstrated below, the television duopoly proposed in this transaction will comply with the FCC's local television multiple ownership rule.²

Neither KVOS-TV nor KFFV is affiliated with one of the major television networks. KVOS-TV is affiliated with the MeTV network and KFFV is affiliated with Azteca America. Neither station is ranked among the top four stations in the Seattle-Tacoma, Washington DMA the most recent all-day (9:00 a.m.-midnight) audience share as measured by Nielsen. Furthermore, there will be eight or more independently owned and operating full-power commercial and noncommercial television stations remaining in the Seattle-Tacoma, Washington DMA following consummation of the proposed assignment of license. *See Table 1*, Coverage Contour Study Station Data (attached) and *Table 2*, Full-Power TV Stations in the Seattle-Tacoma, Washington DMA.

Accordingly, both parts of the two-part test of Section 73.3555(b) are satisfied, and the proposed assignment complies with the local television ownership rule.

¹ *See 2006 Quadrennial Regulatory Review -- Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, Report and Order and Order on Reconsideration, 23 FCC Rcd 2010 (2008); *see also* 47 C.F.R. §73.3555(b) (2008); *see also Review of the Commission's Regulations Governing Television Broadcasting*, 14 FCC Rcd 12903, 12935-40 (1999), *recon. granted in part*, 16 FCC Rcd 1067 (2001).

² 47 C.F.R. § 73.3555(b) (2008).

FIGURE 1
COVERAGE CONTOUR STUDY
STATIONS WITH CONTOURS OVERLAPPING
KFFV-DT AND KVOS-DT IN THE
SEATTLE-TACOMA DMA

prepared November 2011 for
OTA Broadcasting, LLC

Cavell, Mertz & Associates, Inc.
 Manassas, VA

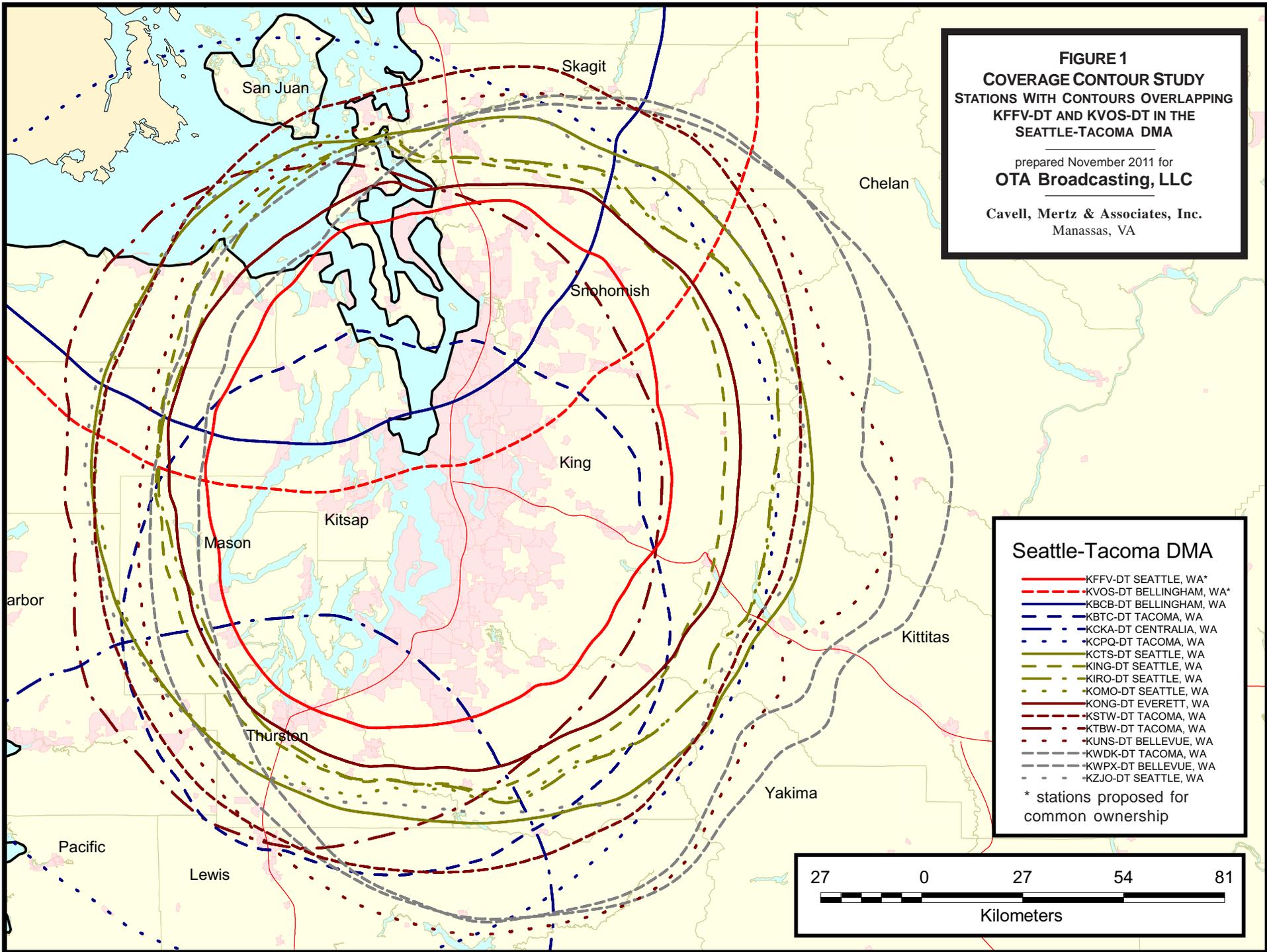


Table 1
COVERAGE CONTOUR STUDY STATION DATA
Nielsen® DMA – Seattle-Tacoma¹
 prepared for
OTA Broadcasting, LLC

<u>Call Sign</u>	<u>City</u>	<u>State</u>	<u>Owner</u>	<u>Network Affiliation</u>
KFFV(TV) ²	Seattle	WA	OTA Broadcasting (SEA), LLC	Azteca
KVOS-TV ²	Bellingham	WA	Newport Television, LLC	IND
KBTC-TV	Tacoma	WA	Bates Technical College	PBS
KCKA(TV)	Centralia	WA	Bates Technical College	PBS
KCPQ(TV)	Tacoma	WA	Tribune Television Holdings. Inc.	Fox
KZJO(TV)	Seattle	WA	Tribune Television Holdings, Inc.	MyTV
KOMO-TV	Seattle	WA	Fisher Broadcasting – Seattle TV, LLC	ABC
KUNS-TV	Bellevue	WA	Fisher Broadcasting – Bellevue TV, LLC	Univision
KING-TV	Seattle	WA	KING Broadcasting Co. (Belo Corp.)	NBC
KONG(TV)	Everett	WA	KONG-TV, Inc. (Belo Corp.)	IND
KBCB(TV)	Bellingham	WA	World Television of Washington, LLC (Venture Technologies Group)	IND
KCTS-TV	Seattle	WA	KCTS Television	ETV
KIRO-TV	Seattle	WA	KIRO-TV, Inc. (Cox Media Group)	CBS
KSTW(TV)	Tacoma	WA	The CW Television Stations, Inc.	CW
KTBW-TV	Tacoma	WA	Trinity Broadcasting of Washington	REL
KWDK(TV)	Tacoma	WA	Puget Sound Educational TV, Inc. (Daystar Television)	REL
KWPX-TV	Bellevue	WA	ION Media License Company, LLC	IND

Facilities selected for this study are all operating facilities. Authorized facilities that have yet to be constructed were not considered. Coverage contours shown in **Figure 1** are the digital service contours as defined in the Commission’s Rules for the individual stations with an adjustment for the “dipole factor” where appropriate. The contours for stations under consideration for common ownership are shown in red.

¹ As shown in the 2010 Broadcasting and Cable Yearbook. Call signs were updated as necessary.

² Stations under consideration for common ownership.

Table 2

Full-Power Television Stations in the Seattle-Tacoma, Washington DMA

Independent Operator No.	Station	Licensee	Group Owner
1.	KBTC-TV, Tacoma, WA	Bates Technical College	Bates Technical College
	KCKA, Centralia, WA	Bates Technical College	Bates Technical College
2.	KING-TV, Seattle, WA	King Broadcasting Co.	Belo Corp.
	KONG, Everett, WA	KONG-TV Inc.	Belo Corp.
3.	KSTW, Tacoma, WA	The CW Television Stations Inc.	CBS Corp.
4.	KIRO-TV, Seattle, WA	KIRO-TV Inc.	Cox Enterprises Inc.
5.	KOMO-TV, Seattle, WA	Fisher Broadcasting-Seattle TV LLC	Fisher Communications Inc.
	KUNS-TV, Bellevue, WA	Fisher Broadcasting-Bellevue TV LLC	Fisher Communications Inc.
6.	KBCB, Bellingham, WA	World Television of Washington LLC	Frank Washington Venture Technologies Group LLC
7.	KWPX-TV, Bellevue, WA	ION Media License Co. LLC	ION Media Networks Inc.
8.	KCTS-TV, Seattle, WA	KCTS Television	KCTS Television
PROPOSED COMBO	KVOS-TV, Bellingham, WA	OTA Broadcasting (SEA), LLC	OTA Broadcasting, LLC
	KFFV, Seattle, WA	OTA Broadcasting (SEA), LLC	OTA Broadcasting, LLC
9.	KWDC, Tacoma, WA	Puget Sound Educational TV, Inc.	Daystar Television
10.	KCPQ, Tacoma, WA	Tribune Television Northwest Inc., DIP	Tribune Broadcasting Co., DIP
	KMYQ, Seattle, WA	Tribune Television Holdings Inc., DIP	Tribune Broadcasting Co., DIP
11.	KTBW-TV, Tacoma, WA	Trinity Broadcasting Network Inc.	Trinity Broadcasting Network, Inc.