

**EXHIBIT 16
FCC Form 314
Section III, Paragraph 6**

Multiple Ownership Compliance

Assignee Indiana Broadcasting, LLC, a subsidiary of LIN Television Corporation ("LIN TV"), is the licensee of station WISH-TV, Ch. 8 (CBS), Indianapolis, Indiana, which is located in the Indianapolis, Indiana, Designated Market Area (the 25th ranked DMA) (the "Indianapolis DMA").¹ The station subject to the instant application, WNDY-TV, Ch. 23 (UPN) (28462), Marion, Indiana, also is licensed to a community in the Indianapolis DMA. Co-ownership of the two same-market TV stations by Assignee fully complies with the FCC's local ownership duopoly rules. See Section 73.3555(b).

The television duopoly rule permits co-ownership of two stations within the same DMA where at least eight independently-owned and operating full-power commercial and noncommercial TV stations will remain in the DMA in which the communities of license of the TV stations in question are located² and at least one of the two co-owned stations is not among the top-four ranked TV

¹ Neither Applicant nor any party to this application has an attributable interest in another full-power television station in the Indianapolis DMA. An affiliate of Applicant is the licensee of WLFI-TV in the adjacent, separate Lafayette, Indiana, DMA. Exhibit 13 contains a full listing of the full-power television stations of group owner LIN TV.

² The FCC counts only those stations whose Grade B contours overlap the Grade B contour of at least one of the stations in the proposed combination.

stations in the DMA based on audience share. Under the eight-voices standard, rankings are based on the most recent all-day (9 a.m.-midnight) audience share, as measured by a professional rating service such as Nielsen Media Research, at the time the application is filed.

Assignee's proposed co-ownership of WISH-TV and WNDY-TV complies with both components of the eight-voices duopoly standard. First, as shown in the attached Declaration of Mr. Scott Blumenthal, Regional Vice President of LIN TV and General Manager of WISH-TV, and Annex A thereto, at least eight independently-owned and operating full-power commercial and noncommercial TV stations will remain in the Indianapolis DMA following the proposed acquisition of WNDY-TV by Indiana Broadcasting, LLC.

Second, as shown in paragraph 2 of the attached Declaration, WNDY-TV is not a top four ranked TV station in the Indianapolis DMA, based on Nielsen's most recent all-day (9 a.m.-midnight) audience share rankings. According to the most recent Nielsen rankings available at the time of filing this application, WNDY-TV is ranked tied for 5th among stations in the DMA.

Thus, the proposed acquisition of television station WNDY-TV by Indiana Broadcasting, LLC meets both components of the eight-voices duopoly standard of Section 73.3555(b).

DECLARATION OF SCOTT BLUMENTHAL

1. I, Scott Blumenthal, am Regional Vice President of LIN Television Corporation ("LIN TV"), the sole member of Indiana Broadcasting, LLC, licensee of WISH-TV, Ch. 8 (CBS), Indianapolis, Indiana, and serve as General Manager of WISH-TV. Indiana Broadcasting, LLC proposes to acquire Station WNDY-TV, Ch. 23 (UPN), Marion, Indiana. Both WISH-TV and WNDY-TV are licensed to communities in the Indianapolis, Indiana, Nielsen Designated Market Area (the 25th ranked DMA) ("Indianapolis DMA").

2. In my capacity as General Manager of WISH-TV, I am personally familiar with the Nielsen Media Research audience surveys for the Indianapolis DMA. The most recent Nielsen survey report for the Indianapolis DMA is the November 2004 Nielsen Station Index ("NSI") covering the survey period from November 4, 2004, through December 1, 2004. In that survey period, WISH-TV was ranked 2nd and WNDY-TV was ranked tied for 5th among the stations in the market based on Nielsen's all-day (9 a.m.-midnight) household audience ratings.

3. Annex A hereto is a tabulation of full-power, operational and independently-owned television stations licensed to communities in the Indianapolis DMA, as compiled by our company's communications counsel. The information in Annex A is based on Warren Publication's *Television & Cable Factbook*, Stations Volume No. 72 (2004 Edition), as supplemented by a recent review of the FCC's on-line database and available files in the FCC's public reference room (although those files may not have been complete). Moreover, I have reviewed the information in the

tabulation based on my own personal knowledge of the Indianapolis DMA and the stations that operate in it. The tabulation shows that at least eight independently-owned, full-power and operational television stations (commercial and noncommercial) will remain in the Indianapolis DMA following the proposed acquisition of WNDY-TV.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.


Scott Blumenthal

January 18, 2005

ANNEX A

**Full-Power, Operational And Independently-Owned Commercial And Noncommercial
TV Stations Licensed To Communities In The Indianapolis IN DMA**
(Source: TV & Cable Factbook 2004 and FCC CDBS Database)

Station Count	Station Call Sign (FCC Facility ID)	Channel/DTV (Network)	Community of License	Licensee (Owner)
1	WISH-TV (39269)	8/9 (CBS)	Indianapolis, IN	Indiana Broadcasting, LLC (LIN TV Corp.)
2	WNDY-TV (28462)	23/32 (UPN)	Marion, IN	UPN Stations Group, Inc. (Viacom, Inc.)
3	WTHR (70162) (ISA w/ WIPX (PAX), Bloomington)	13/46 (NBC)	Indianapolis, IN	VideoIndiana Inc. (The Dispatch Printing Company)
4	WIPX (10253)	63/27 (PAX)	Bloomington, IN	Paxson Indianapolis License, Inc. (Paxson Communications Corporation)
5	WXIN (146)	59/45 (FOX)	Indianapolis, IN	Tribune Television Co. (Tribune Broadcasting Co.)
	WTTV (56523) (also operates WTTK, Kokomo, IN as a Satellite)	4/53 (WBN)	Bloomington, IN	Tribune Broadcast Holdings, Inc. (Tribune Broadcasting Co.)
	WTTK (56526) (Satellite of WTTV)	29/54 (WBN)	Kokomo, IN	Tribune Broadcast Holdings, Inc. (Tribune Broadcasting Co.)
6	WRTV (40877)	6/25 (ABC)	Indianapolis, IN	McGraw-Hill Broadcasting Co., Inc. (McGraw-Hill Broadcasting Co.)

7	WCLJ (68007)	42/56 (TBN)	Bloomington, IN	Trinity Broadcasting of Indiana, Inc. (Same)
8	WHMB-TV (37102)	40/16 (IND)	Indianapolis, IN	LeSea Broadcasting of Indianapolis, Inc. (LeSea Broadcasting Co.)
9	WTIU (66536)	30/14 (PBS)	Bloomington, IN	Trustees of Indiana University (Same)
10	WFYI (41397)	20/21 (PBS)	Indianapolis, IN	Metro Indianapolis Public Broadcasting Inc. (Same)
11	WDTI (7908)	69/44 (ETV)	Indianapolis, IN	Indianapolis Community Television, Inc. (Same)
12	WIPB (3646)	49/52 (PBS)	Muncie, IN	Ball State University (Same)