

HOLSTON VALLEY BROADCASTING CORPORATION
WVEK-FM FORM 314
EXHIBIT NO. 15

COMPLIANCE WITH 47 CFR §73.3555

Holston Valley Broadcasting Corporation currently has attributable interests in one full-power television station, 3 AM stations and 2 FM stations in the Arbitron defined “Johnson City-Kingsport-Bristol” radio metro market. These stations are:

- WKPT-TV, analog channel 19, Kingsport, Tennessee
- WKPT(AM), 1400 kHz, Kingsport, Tennessee
- WOPI(AM), 1490 kHz, Bristol, Tennessee-Virginia
- WKTP(AM), 1590 kHz, Jonesborough, Tennessee
- WTFM(FM), 98.5 MHz, Kingsport, Tennessee
- WRZK(FM), 95.9 MHz, Colonial Heights, Tennessee

Holston Valley is the licensee of all of these stations except for WRZK(FM), to which it provides programming pursuant to a Time Brokerage Agreement. There is attached hereto a map which depicts the city-grade contours of the radio stations listed above along with the city-grade contour of the station to be acquired, WVEK-FM. As a result of this acquisition, Holston Valley would have attributable interests in six commercial radio stations (three in each service) in the Johnson City-Kingsport-Bristol radio metro market.

There is also attached hereto a list of all commercial and non-commercial full power AM and FM broadcast stations either licensed to communities located in the counties (or Bristol City, VA) within the Arbitron-defined radio metro market, or which Arbitron has determined are “home to the market”. There are 41 such stations.

Section 73.3555(a)(1)(ii) states as follows:

In a radio market with between 30 and 44 (inclusive) full-power, commercial and noncommercial radio stations, not more than 7 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM);

Therefore, Holston Valley could have attributable interests in as many as 7 commercial radio stations in the Johnson City-Kingsport-Bristol market (4 in any one service); its proposed ownership of WVEK-FM complies with this rule section¹.

¹With respect to Holston Valley’s WMEV(AM) and WMEV-FM, Marion, Virginia, Marion is the county seat of Smyth County, Virginia, which is located outside the Arbitron-defined Johnson City-Kingsport-Bristol radio metro market. WMEV-FM is currently determined by Arbitron to be “home to” the Bluefield, West Virginia radio metro market.

With respect to the “cross-ownership” between WKPT-TV and WVEK-FM, the Commission’s rule, Section 73.3555(c), as reported on the Government Printing Office’s website² states as follows:

(c) Cross-media limits. **Cross-ownership of** a daily newspaper and commercial broadcast stations, or of **commercial broadcast radio and television stations, is permitted without limitation** except as follows:

(1) In Nielsen Designated Market Areas (DMAs) to which three or fewer full-power commercial and noncommercial educational television stations are assigned, no newspaper/broadcast or radio/television cross-ownership is permitted.

(2) In DMAs to which at least four but not more than eight full-power commercial and noncommercial educational television stations are assigned, an entity that directly or indirectly owns, operates or controls a daily newspaper may have a cognizable interest in either:

(i) One, but not more than one, commercial television station in combination with radio stations up to 50% of the applicable local radio limit for the market; or,

(ii) Radio stations up to 100% of the applicable local radio limit if it does not have a cognizable interest in a television station in the market.

(3) The foregoing limits on newspaper/broadcast cross-ownership do not apply to any new daily newspaper inaugurated by a broadcaster.

WKPT-TV operates in the so-called Tri-Cities TN/VA Nielsen Designated Market Area (DMA), which encompasses 8 counties and Bristol City in Virginia, 7 counties in Tennessee and 2 counties in Kentucky. The following full-power television stations have been determined by Nielsen to serve this market:

1. WCYB(TV), analog channel 5, Bristol, VA, NBC
2. WJHL(TV), analog channel 11, Johnson City, TN, CBS
3. WKPT-TV, analog channel 19, Kingsport, TN, ABC
4. WEMT(TV), analog channel 39, Greeneville, TN, FOX
5. WSBN(TV), analog channel 47, Norton, VA, PBS
6. WMSY(TV), analog channel 52, Marion, VA, PBS
7. WLFQ(TV), analog channel 68, Grundy, VA, Independent

Since the relevant DMA has more than three television stations, Holston Valley’s proposed cross-ownership of WKPT-TV and WVEK-FM is specifically permitted by Section 73.3555(c) of the Rules.

²http://a257.g.akamaitech.net/7/257/2422/16nov20071500/edocket.access.gpo.gov/cfr_2007/octqtr/47cfr73.3555.htm