

Exhibit 15
Section III, Item 6b
Statement in Support of Continued Satellite Status of
Stations KMOT(TV), KQCD-TV, and KUMV-TV

The Grade B contours of KMOT(TV), Minot, North Dakota (“KMOT”), KQCD-TV, Dickinson, North Dakota (“KQCD”), and KUMV-TV, Williston, North Dakota (“KUMV”), overlap the Grade B contour of KFYZ-TV, Bismarck, North Dakota (“KFYZ”) (collectively, the “Stations”). Stations KMOT, KQCD, and KUMV currently operate as satellite stations of KFYZ and thus the current joint ownership is compliant with the Federal Communications Commission’s (“Commission”) local television ownership rule. Hoak proposes to continue to operate stations KMOT, KQCD, and KUMV as satellite stations of KFYZ. The local television ownership rule does not apply to satellite stations.¹

The Commission requires that all applicants seeking to transfer or assign satellite stations justify continued satellite status by demonstrating compliance with the satellite exemption policy that is applicable to new satellite stations.² Pursuant to the Commission’s satellite exemption policy, an applicant is entitled to a presumption that its proposed satellite operation is in the public interest if it meets three criteria: (1) no city grade contour overlap exists between the parent and the satellite; (2) the proposed satellite station will provide service to an underserved area; and (3) no alternative operator is ready and able to either construct or to purchase and operate the satellite as a full-service station.³ An applicant seeking Commission consent to the assignment or transfer of a station that previously has been granted satellite status must demonstrate that these three criteria are applicable or, in the alternative, that compelling circumstances exist to warrant continued satellite status.⁴ If an applicant cannot qualify for the presumption, the Commission will evaluate the proposal on an ad hoc basis, and grant the application if there are compelling circumstances that warrant approval.⁵ Both of the Stations meet all three of the satellite waiver criteria and thus should continue to qualify as satellite stations following the consummation of the proposed assignment.

First, as the attached engineering exhibit demonstrates, no overlap exists between the city grade contours of KFYZ and its three satellite stations, KMOT, KQCD, and KUMV.⁶ Second, the proposed satellite stations provide service to “underserved” areas. Specifically, according to

¹ 47 CFR § 73.3555 Note 5. As such, operation of KMOT, KQCD, and KUMV as satellites of KFYZ will not violate the Commission’s local television ownership rule. See Review of the Commission’s Regulations Governing Television Broadcasting, MM Docket No. 91-221, Television Satellite Stations Review of Policy and Rules, *Report and Order*, MM Docket No. 87-8, FCC 99-209, 14 FCC Rcd. 12903 (1999).

² See Television Satellite Stations, 6 FCC Rcd. 4212, 4215 (1991) (“Satellite Order”).

³ Id.

⁴ Id.

⁵ Id.

⁶ See Attachment A, Engineering Exhibit.

the Commission's "reception" test, all three satellite stations serve underserved areas. The reception test states that an area is underserved if twenty-five (25) percent or more of the area located within the satellite's Grade B contour, but outside the parent's Grade B contour, receives four or fewer services excluding the service provided by the satellite.⁷ Utilizing the reception test, the attached engineering exhibit indicates that four or fewer services are received in 97.2% of the area located within station KMOT's Grade B contour, but located outside of the KFYZ Grade B contour.⁸ Therefore, station KMOT serves an underserved area. The engineering exhibit also shows that for stations KUMV and KQCD, four or fewer services are received in greater than 98% of the area within each of the two stations' Grade B contours, but located outside the KFYZ Grade B contour.⁹ Thus, the areas where satellite stations KUMV and KQCD are located are also underserved.

Third, as stated in the attached expert opinion it is clear that no alternative operator is ready and able to purchase and operate any of the satellite stations as a full-service station.¹⁰ Whereas satellite stations KMOT, KQCD, and KUMV cover only small outlying communities within the Minot-Bismarck-Dickinson DMA, none of these stations would be able to gain access to network or syndicated programming without operating as a satellite of another station in the market. Further, the four major broadcast networks already have affiliates in the Minot-Bismarck-Dickinson DMA and are likely to have DMA-wide exclusivity for such programming, as is typical in affiliation agreements. Given the small market and level of revenues available in these markets, none of these stations operating as a stand-alone station would be able to afford to purchase licensing rights for local programming such as college sports events. It also is unlikely that any of these stations operating as a stand-alone station could afford to produce and air local news such as that aired throughout the Minot-Bismarck-Dickinson DMA on KFYZ. The Commission most recently granted stations KMOT, KQCD, and KUMV continued satellite status on October 8, 2002.¹¹ Accordingly, for the reasons set forth above, the Media Bureau should grant continued satellite status for these stations. Assuming such status is granted, the stations will not be counted and considered for purposes of evaluating the assignee's compliance with the local television ownership rule.

⁷ See Satellite Order at 4214.

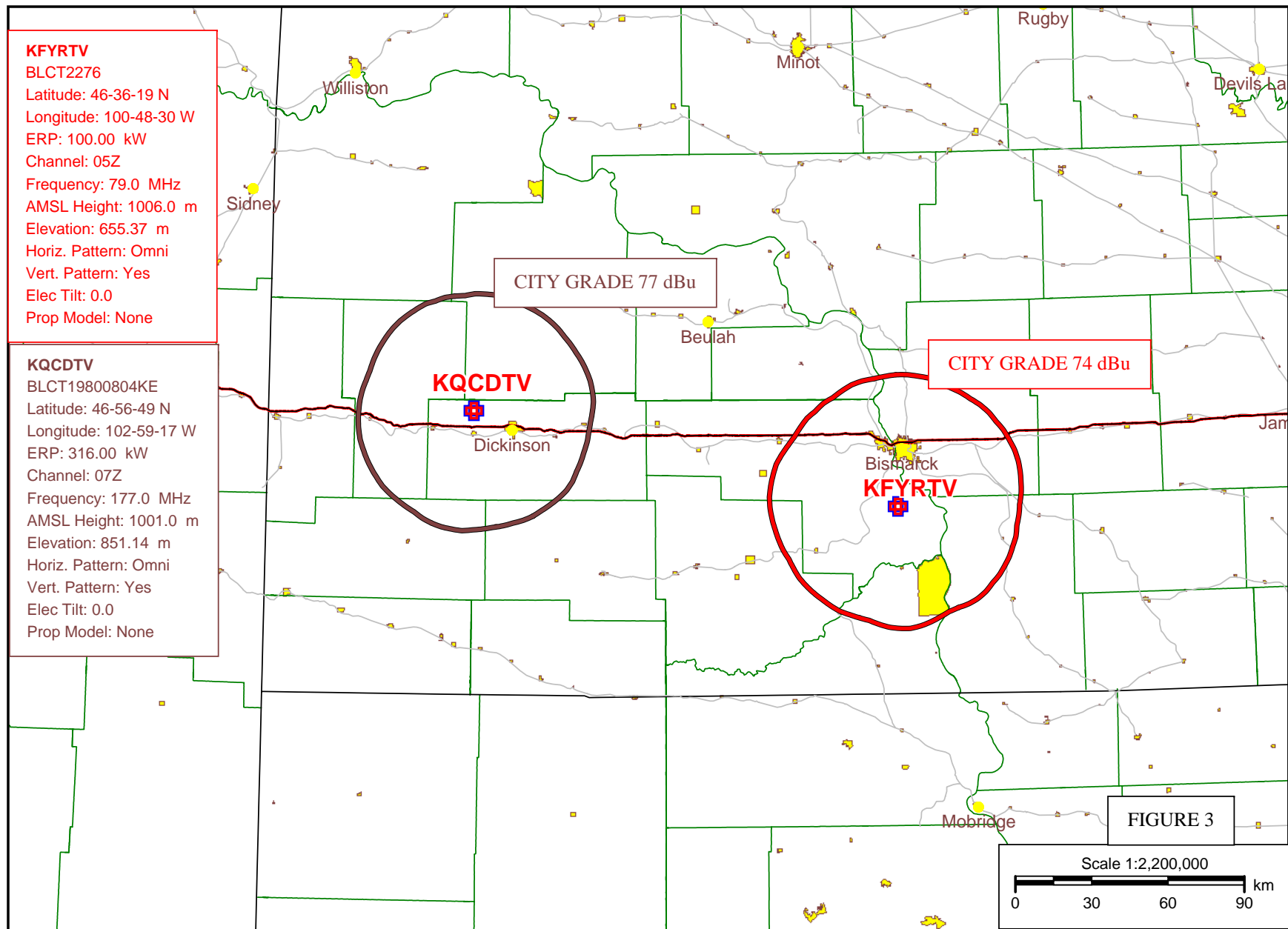
⁸ See Attachment B, Engineering Exhibit II

⁹ See id.

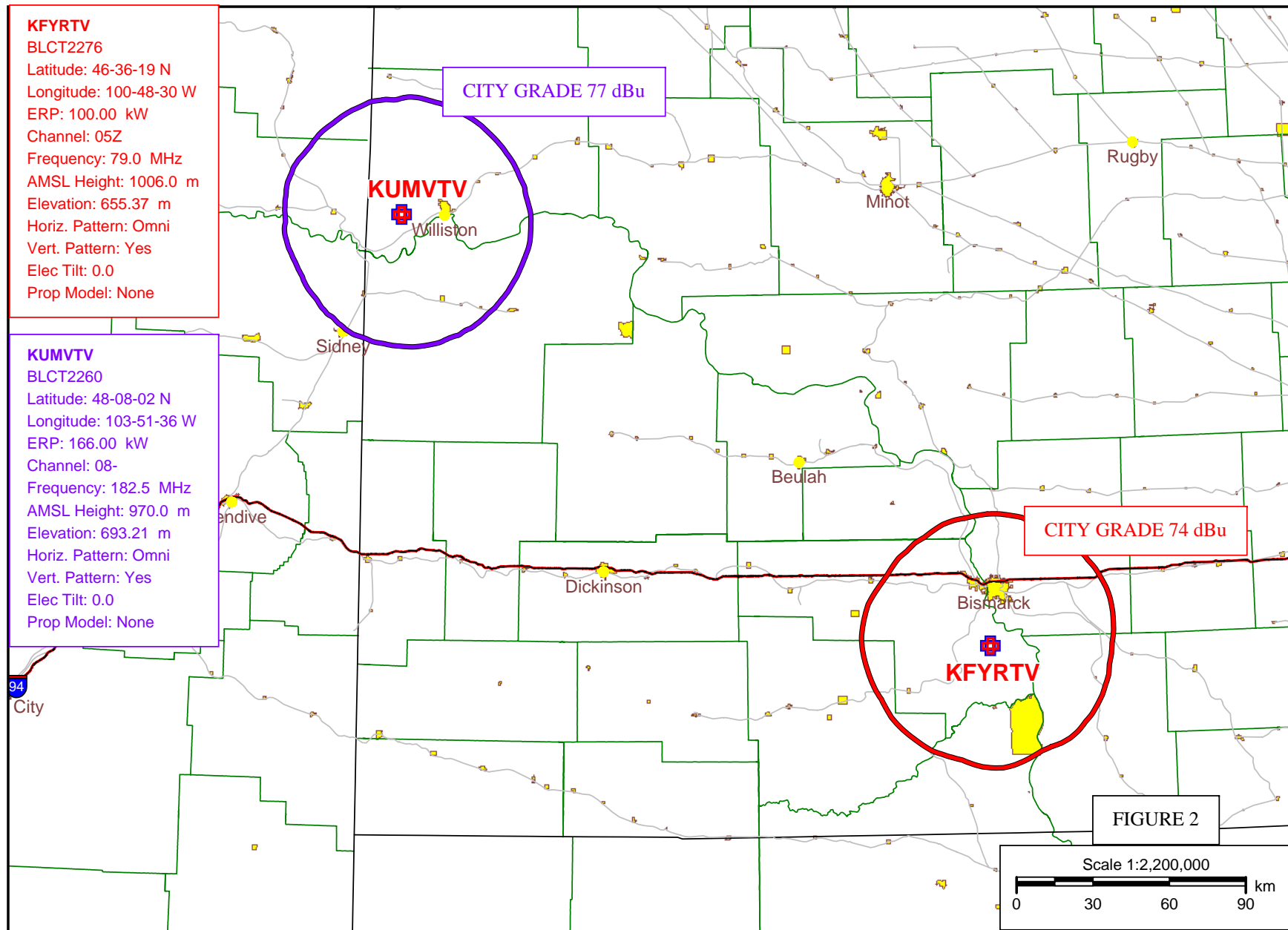
¹⁰ See Attachment C, Expert Opinion.

¹¹ See Letter from Barbara A. Krisman, Chief, Video Division, Media Bureau to North Dakota Television License Sub, LLC, File Nos. BALCT-20020807AAZ, BALCT-20020807ABB, BALCT-20020807ABA, BALCT-20020807ABC, BALCT-20020807AAY. (October 8, 2002).

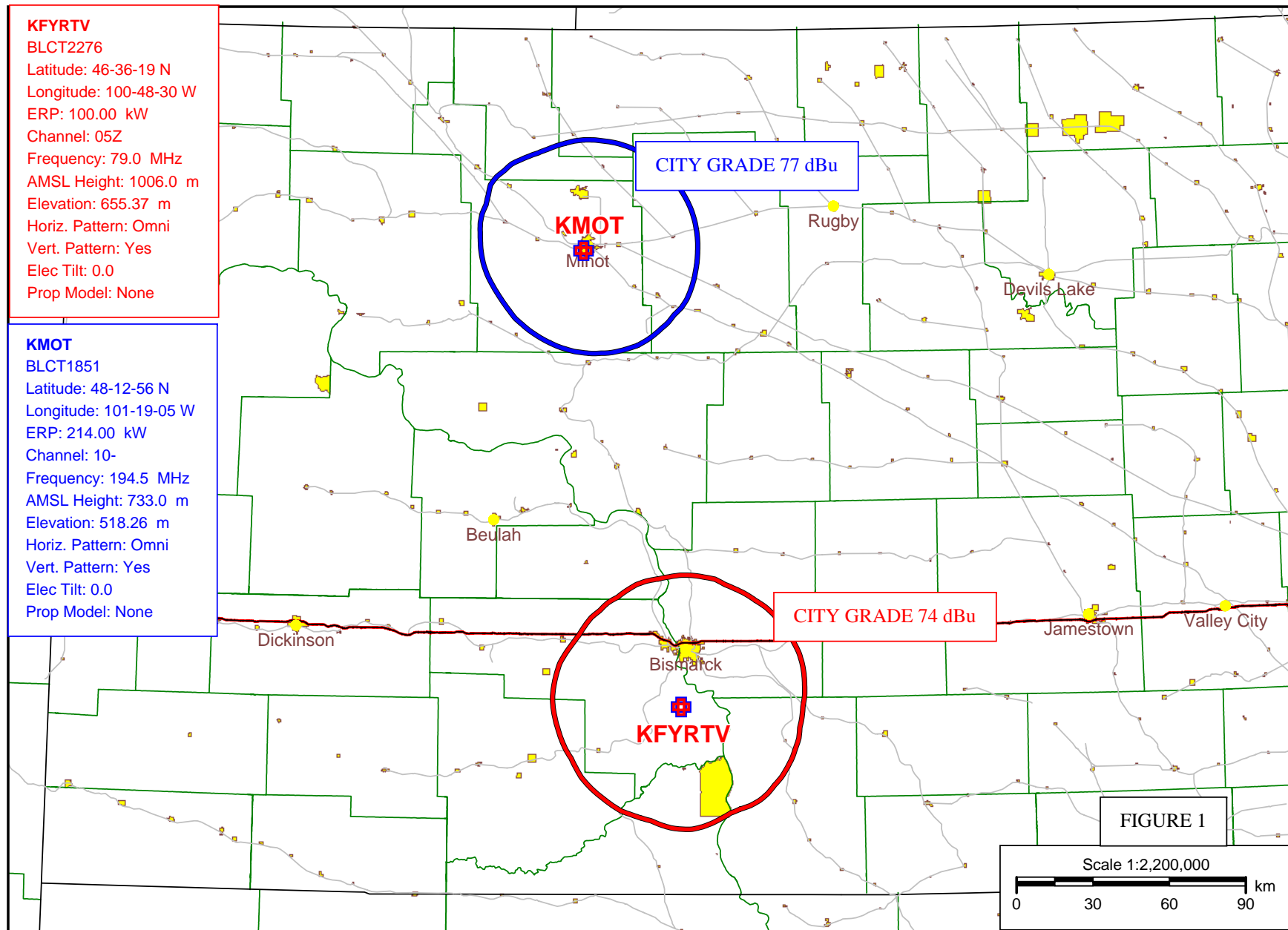
Attachment A
Engineering Exhibit



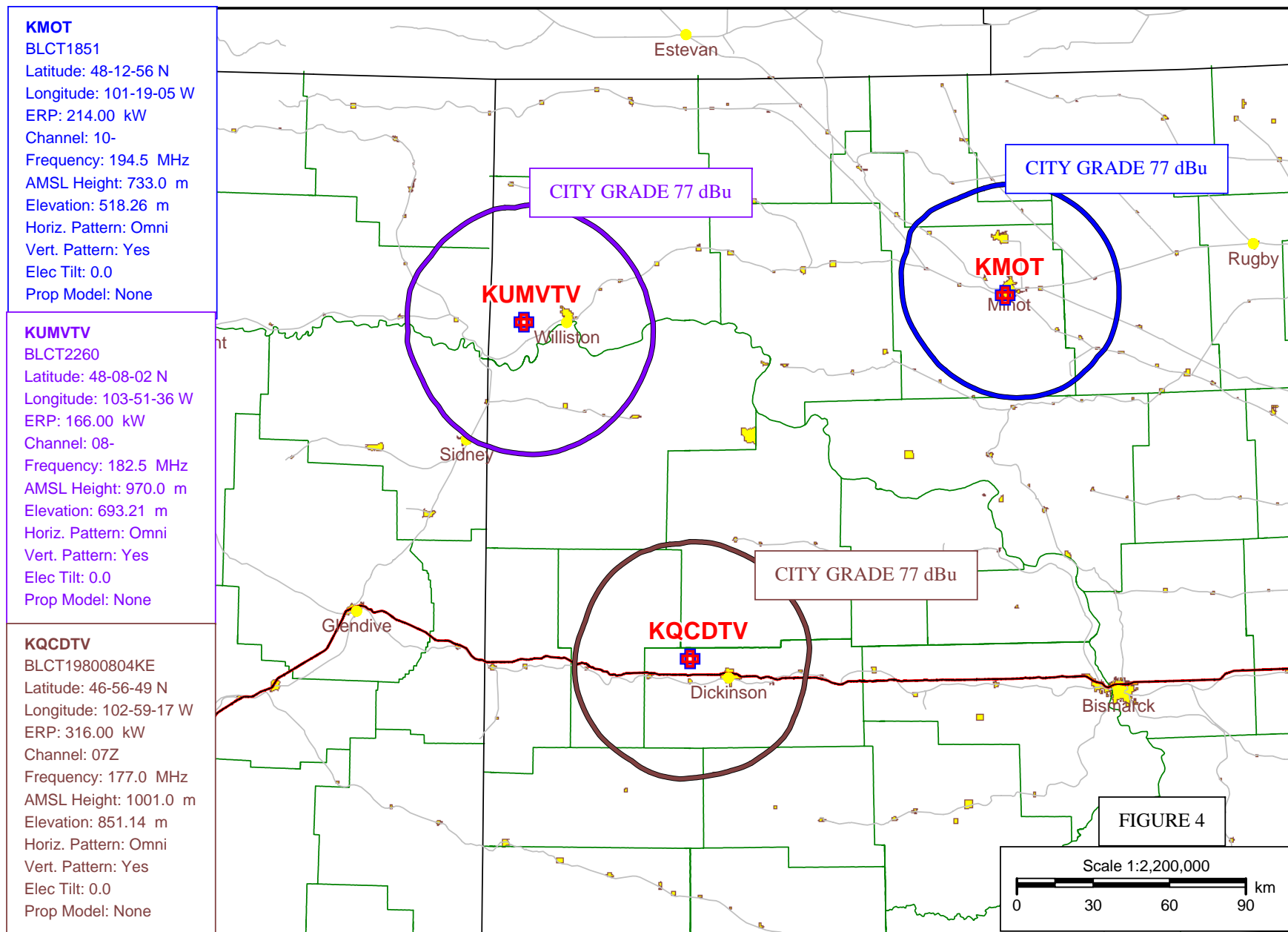
COMPUTED CITY GRADE CONTOURS FOR THE LICENSED OPERATIONS OF KFYR-TV AND SATELLITE TV STATION KQCD-TV



COMPUTED CITY GRADE CONTOURS FOR THE LICENSED OPERATIONS OF KQCD-TV AND SATELLITE TV STATION KUMV-TV

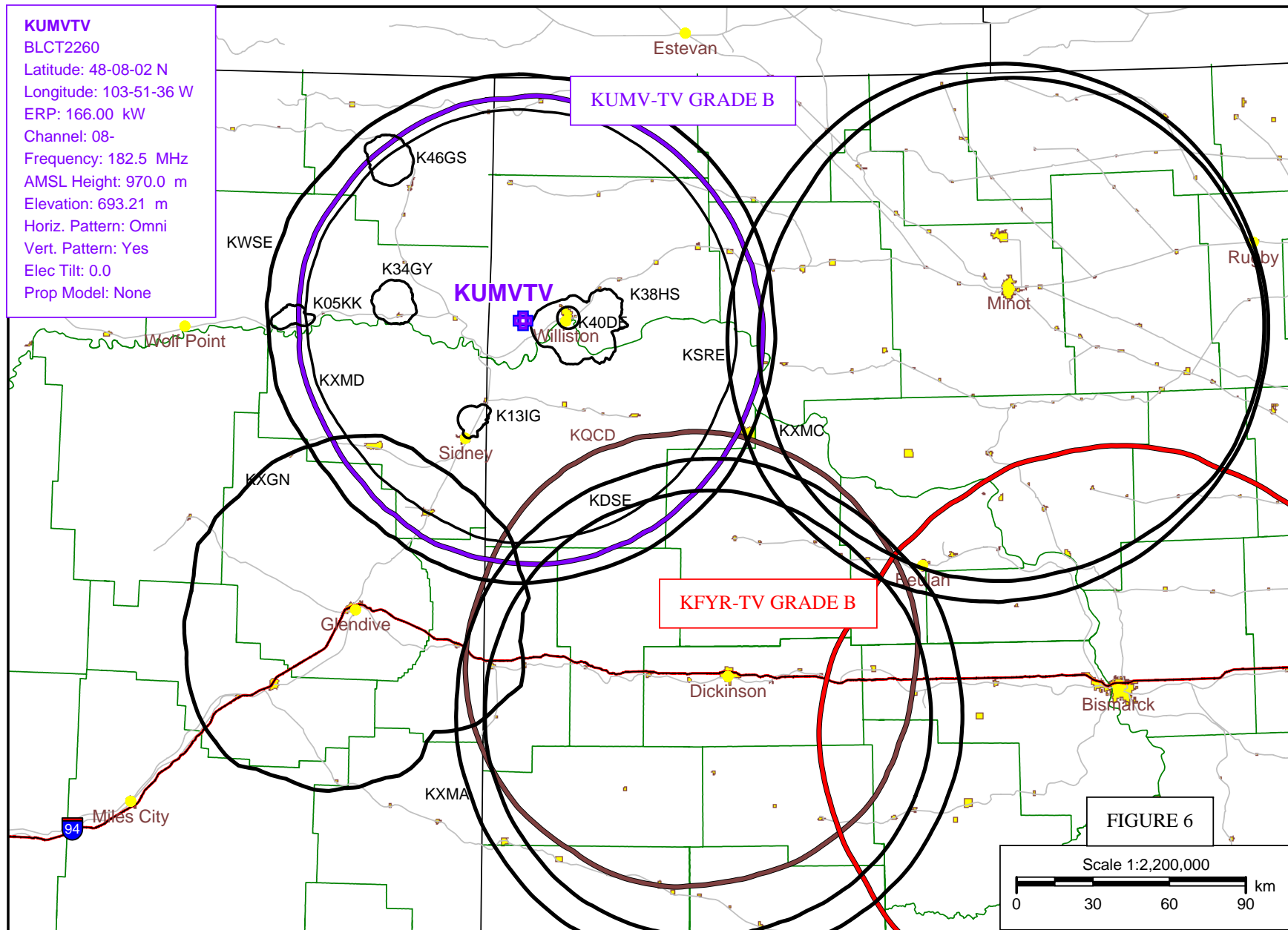


COMPUTED CITY GRADE CONTOURS FOR THE LICENSED OPERATIONS OF KFYR-TV AND SATELLITE TV STATION KMOT-TV

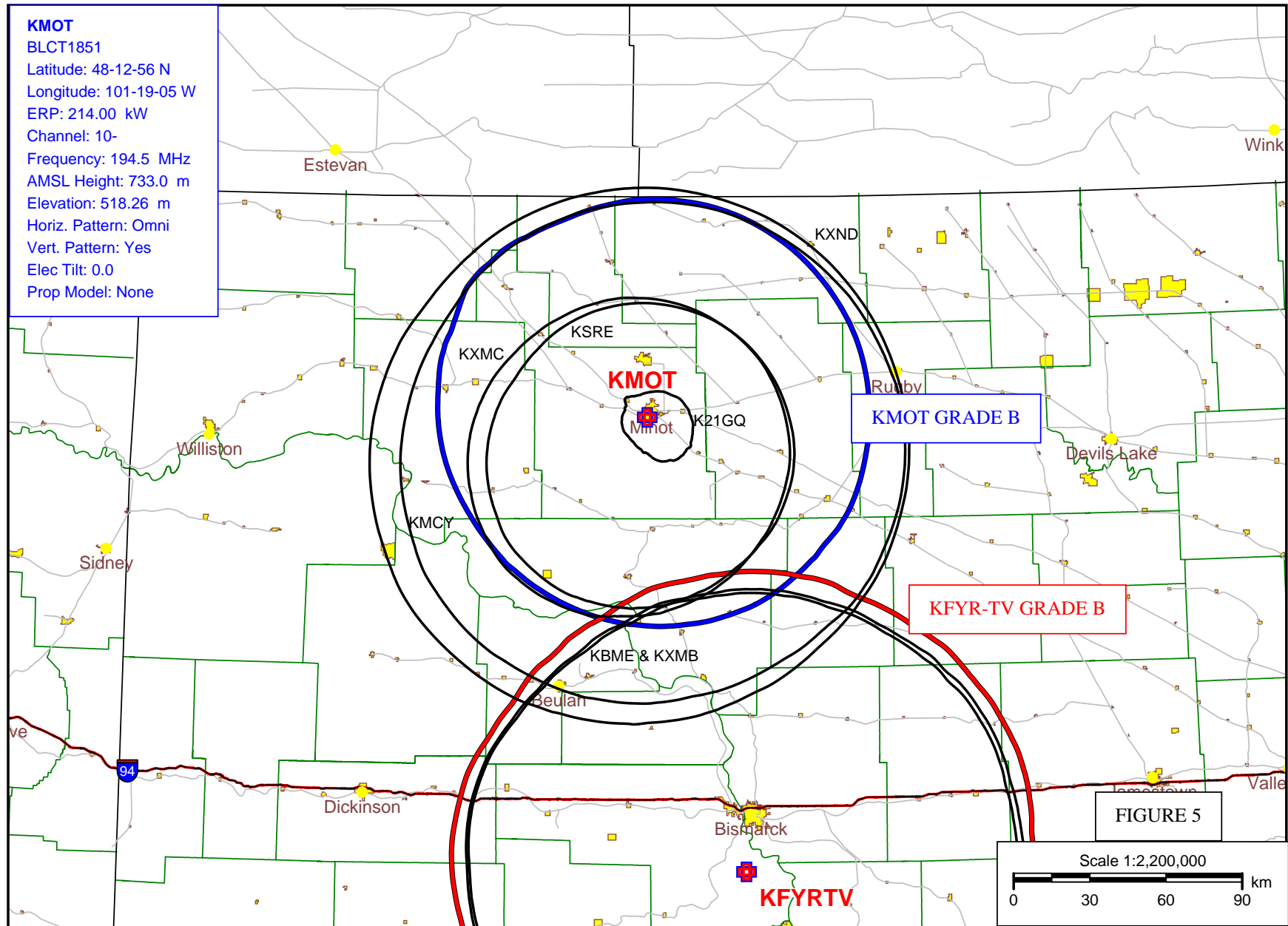


COMPUTED CITY GRADE CONTOURS FOR THE LICENSED SATELLITE TV OPERATIONS OF KMOT(TV), KUMV-TV AND KQCD-TV

Attachment B
Engineering Exhibit II



COMPUTED GRADE B CONTOURS FOR THE LICENSED SATELLITE TV STATION KUMV-TV AND OTHER TV STATIONS



COMPUTED GRADE B CONTOURS FOR THE LICENSED SATELLITE TV STATION KMOT(TV) AND OTHER TV STATIONS



Attachment C
Expert Opinion

**ECONOMIC VIABILITY STUDY REGARDING THE SATELLITE STATUS OF
KQCD-TV, DICKINSON, NORTH DAKOTA,
KMOT(TV), MINOT, NORTH DAKOTA, AND
KUMV-TV, WILLISTON, NORTH DAKOTA**

Introduction

This study was prepared by Kelly Callan, Vice President of Kalil & Co., Inc. ("Kalil"), in support of the application seeking Federal Communications Commission ("Commission") consent to the assignment of the licenses and assets of full-power commercial television station KFYZ-TV, Bismarck, North Dakota ("KFYZ"), and satellite television stations KMOT(TV), Minot, North Dakota ("KMOT"), KQCD-TV, Dickinson, North Dakota ("KQCD"), and KUMV-TV, Williston, North Dakota ("KUMV") (collectively, the "Stations") from North Dakota Television License Sub, L.L.C. ("NDTV") to Hoak Media of Dakota License, LLC ("Hoak"). Specifically, this study was prepared to support Hoak's request that the Commission grant continued satellite status to KMOT, KQCD, and KUMV.

Kalil & Co., Inc. is located in Tucson, Arizona and has been in the media brokerage business for over thirty five years. Kalil & Co., Inc. is involved in all phases of the broadcast brokerage business and represents some of the most prestigious broadcasters in the business. Kalil & Co., Inc. conducts transactions in all sections of the United States and are widely recognized as one of the top brokerage organizations in the country. Over the past three years, Kalil & Co., Inc. handled transactions totaling approximately one billion dollars. Kelly Callan is Vice President of Kalil & Co., Inc. and has been with the firm for over 20 years. The opinions expressed in this study are solely those of Kalil. Neither he nor his firm has any interest, direct or indirect, in NDTV or Hoak. The opinions expressed in this study also are not contingent on any fee paid to Kalil by Hoak for this analysis.

Analysis

KMOT, licensed to Minot, North Dakota, KQCD, licensed to Dickinson, North Dakota, and KUMV, licensed to Williston, North Dakota, all currently operate as satellite television stations of KFYZ, which is licensed to Bismarck, North Dakota. All of the Stations are assigned to the Minot-Bismarck-Dickinson Nielsen Designated Market Area ("DMA"). The Minot-Bismarck-Dickinson DMA currently is served by four (4) commercial television stations listed in Table 1 as "MAIN" facilities and eight (8) satellite commercial television stations, which are listed as "SAT" facilities. In addition to these commercial television stations, there also are six (6) public television stations operating in the Minot-Bismarck-Dickinson DMA. Because these public stations do not compete for television advertising revenue, they have been excluded from the economic analysis presented in this study.

**TABLE 1: Full-Power and Other Network-Affiliated Stations Serving
Minot-Bismarck-Dickinson DMA¹**

Station	Community of License	Channel	Affiliation	Type
KBMY	Bismarck	17	ABC	MAIN
KFYR-TV	Bismarck	5	NBC	MAIN
KNDX	Bismarck	26	FOX	MAIN
KXMC-TV	Minot	13	CBS	MAIN
KMCY	Minot	14	ABC	SAT
KMOT	Minot	10	NBC	SAT
KQCD-TV	Dickinson	7	NBC	SAT
KUMV-TV	Williston	8	NBC	SAT
KXMA-TV	Dickinson	2	CBS	SAT
KXMB-TV	Bismarck	12	CBS	SAT
KXMD-TV	Williston	11	CBS	SAT
KXND	Minot	24	FOX	SAT

The Minot-Bismarck-Dickinson DMA is a small market. Specifically, the Minot-Bismarck-Dickinson DMA is ranked number 160 and contains only 335,000 people and 134,000 television households.² It is the opinion of the principals of Kalil that, if converted to full service stations, KMOT, KQCD, and KUMV would not be financially successful in this market. Beyond the fact that the market itself is small, the terrain of the market is such that KMOT, KQCD, and KUMV are each able to cover only a small population area within the Minot-Bismarck-Dickinson DMA. As a general rule, significant coverage within a DMA is necessary for a television station to generate sufficient viewership and advertising revenues to be successful as a stand-alone station. In this case, KMOT, KQCD, and KUMV each have only minimal coverage in the DMA and therefore are unlikely to be successful. Specifically, because KMOT, KQCD, and KUMV each cover only small outlying communities within the Minot-Bismarck-Dickinson DMA, none of these stations would be able to gain access to network or syndicated programming without operating as a satellite of another station in the market. Even if it were possible for the satellites to serve a greater portion of the market, they would have no prospect of reaching affiliation agreements with any meaningful compensation, if at all, from any of the existing networks because the four major broadcast networks already have affiliates in the Minot-Bismarck-Dickinson DMA. These affiliates are likely to have DMA-wide exclusivity for such programming, as is typical in affiliation agreements. The total amount of television advertising revenues available in the small Minot-Bismarck-Dickinson DMA would prevent KMOT, KQCD, or KUMV from operating profitably as a stand-alone station and having sufficient revenue to purchase licensing rights for off-network, syndicated, and other attractive entertainment

¹ *BIA Media Access Pro* database (consulted July 18, 2006).

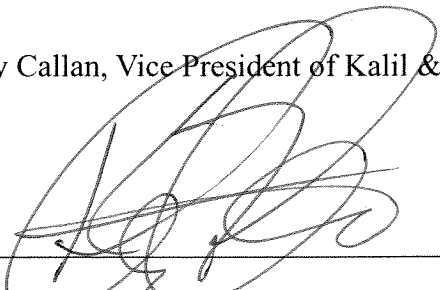
² *Id.*

programming such as college sports events and to produce and air local news. Without the ability to secure an affiliation agreement or air other attractive entertainment, sports, and local programming such as news, none of these stations can be economically viable as a stand-alone station. Further, forcing any or all of these stations to operate as a stand-alone station would prevent KFYZ from providing the service throughout the Minot-Bismarck-Dickinson DMA that it currently is able to provide via its satellite stations. There is very little contour and population overlap between KFYZ and each of its satellite stations, and KFYZ requires these three satellite stations to reach as many households as possible in the market, with the objective of generating sufficient revenues to make a profit. Based on the experience of the principals of Kalil, neither KMOT, KQCD, nor KUMV could survive as a stand-alone station in the Minot-Bismarck-Dickinson DMA, and loss of any of these satellite stations would compromise the service provided to the market by KFYZ.

Review of the statement of income for 2005 for the three satellite stations further supports the opinion of the principals of Kalil that neither KMOT, KQCD, nor KUMV could survive as a stand-alone station. Specifically, in 2005 KFYZ generated over seventy percent of the revenue from all four Stations combined. Furthermore, any entity wishing to purchase KMOT, KQCD or KUMV as full-power stations would be forced to hire numerous additional employees. Currently, KMOT, KQCD or KUMV are operated by small staffs as many of the satellite stations' basic functions are performed by employees of KFYZ. Accordingly, the financial materials reviewed by Kalil fully support continued satellite status for KMOT, KQCD, and KUMV in order for these stations to remain economically viable. Furthermore, KFYZ would also be damaged financially trying to compete with other strong affiliates in the DMA that have the advantage of having satellite stations.

Kalil, in its capacity as a media brokerage firm, was retained by NDTV in Kalil to list stations KFYZ, KMOT, KQCD, and KUMV for sale. All potential buyers of the stations expressed that their interest in the stations was as a package. There was no interest in a purchase of either KMOT, KQCD, or KUMV as a stand-alone station. In fact, had Kalil been asked to list just KMOT, KQCD, or KUMV for sale as a stand-alone station, the firm would have declined to do so. It is the opinion of the principals of Kalil that there would be no knowledgeable, qualified buyers of television stations who would be interested in KMOT, KQCD, or KUMV as stand-alone stations.

This study is submitted on July 20, 2006 by Kelly Callan, Vice President of Kalil & Co., Inc.



Kelly Callan
Vice President
Kalil & Co., Inc.