

### **Multiple Ownership Compliance**

By this application, Meredith Corporation (“Meredith”) seeks consent of the Commission to the transfer of control of KPLR, Inc., licensee of full power television broadcast station KPLR-TV, St. Louis, Missouri (FCC Id. No. 35417) (“KPLR-TV”), from Sinclair Television Group, Inc., to Meredith immediately following consummation of the pending merger (the “Merger Transaction”) of Sinclair Broadcast Group, Inc. and Tribune Media Company.

KPLR-TV, an affiliate of the CW Network, operates in the St. Louis, Missouri Designated Market Area (“DMA”). Meredith is the licensee of KMOV(TV), St. Louis, Missouri, also a full power television station operating in the St. Louis DMA. Grant of this application would create common television station ownership in the St. Louis DMA that complies with the Commission’s current multiple ownership rules, as amended.<sup>1</sup>

In the *Reconsideration Order*, the Commission amended its multiple ownership rules to eliminate the so-called “Eight-Voices Test” and permit *per se* common ownership and control of two television stations in the same DMA so long as one of those two stations is not a “Top-Four” ranked station in the DMA, measured by audience share. See *Reconsideration Order* at ¶¶ 73-82.

The common ownership of KPLR-TV and KMOV(TV) proposed herein complies with the new standard adopted in the *Reconsideration Order*. Attached hereto is a report setting forth audience ratings and share data from The Nielsen Company for the St. Louis DMA from the most recently available monthly ratings (for March 2018), measuring household viewing, Monday-through-Sunday, all-day (9 a.m. to 12 a.m.), in accordance with Section 73.3555(b)(1)(ii) of the Commission’s Rules.<sup>2</sup> These data show that KPLR-TV ranks below the market’s “Top-Four” rated stations. Given these facts, the KPLR-TV/KMOV(TV) combination proposed herein is fully compliant with current Commission multiple ownership rules.

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<sup>1</sup> See 2014 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, FCC 17-156, Order on Reconsideration and Notice of Proposed Rulemaking, rel. Nov. 20, 2017 (“*Reconsideration Order*”). Notice of the FCC’s adoption of the *Reconsideration Order* appeared in the *Federal Register* on January 8, 2018, making February 7, 2018 the effective date of the rule changes adopted therein. See <https://www.federalregister.gov/documents/2018/01/08/2017-28329/2014-quadrennialregulatory-review>

<sup>2</sup> A request for confidentiality is being submitted with respect to the proprietary and confidential business data in the Nielsen report.