

**FCC Form 315**

**Transfer of Control of Benedek License Corporation  
from Station Holdings Company, Inc., Debtor in Possession  
to Gray Communications Systems, Inc.**

**EXHIBIT 17 (Supplement)  
Compliance with TV Duopoly Rule**

Exhibit 17 of the pending application demonstrates that Gray's proposed co-ownership of KAKE-TV (Wichita), KLBV (Colby) and KUPK-TV (Garden City) complies with Section 73.3555(b)(1) of the television duopoly rules because no Grade B contour overlap exists between any of the stations. Because ownership of the three stations is authorized under the revised duopoly rule, Assignee is not seeking a "satellite" exemption to the duopoly rule under Note 5 (nor is it seeking, at this time, a main studio waiver for any of the three stations).