

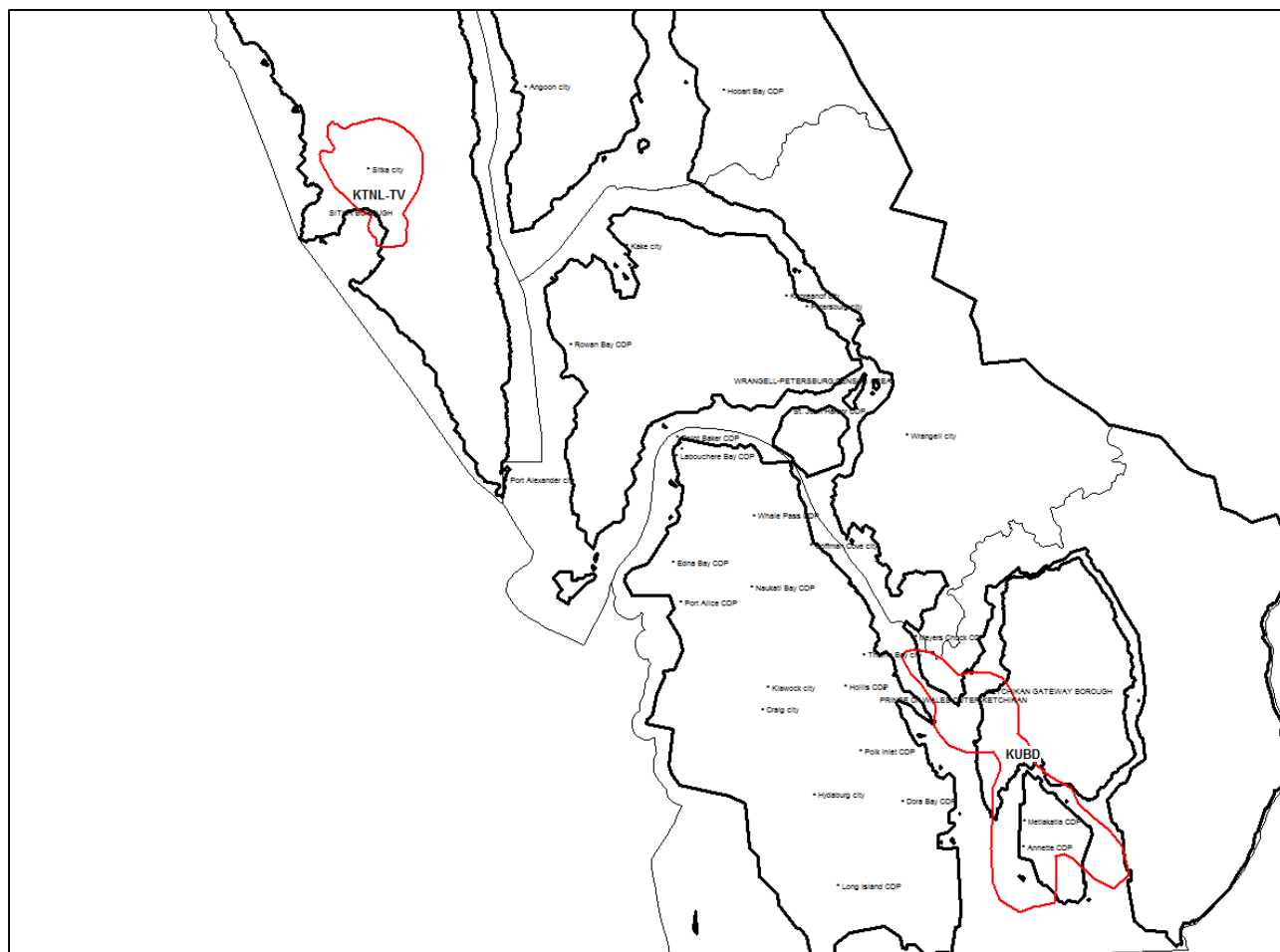
Multiple Ownership

The licenses for two full-power television stations are proposed to be assigned in this transaction: KUBD(TV), Ketchikan, Alaska and KTNL-TV, Sitka, Alaska. Both stations are located in the Juneau, Alaska Designated Market Area (“DMA”). Pursuant to Section 73.3555(b) of the Commission’s rules, it is permissible for an entity to own two television stations in the same DMA if the Grade B contours of the stations do not overlap.¹ In this instance, as shown below, the digital noise-limited contours of KUBD(TV) and KTNL-TV do not overlap.² Further, the proposed assignee, Denali Media Juneau, Corp. (“Denali Media Juneau”), does not currently own any full-power television stations in the Juneau DMA. Accordingly, this transaction complies with the Commission’s multiple ownership rules.³

¹ 47 C.F.R. § 73.3555(b) (the “Duopoly Rule”).

² Although the Duopoly Rule refers to television stations’ Grade B contours, following the transition to digital broadcasting, the FCC has treated digital noise-limited contours as the “functional equivalent” of Grade B contours for purposes of this rule. *See, e.g., Riverside Media, LLC*, 26 FCC Rcd 16038 16060 n.2 (2011) (citation omitted).

³ While Denali Media Juneau understands that none of the other assignee “parties to the application” have any other broadcast or newspaper interests in the market, several such parties did not submit updated responses to Denali Media Juneau’s ownership questionnaire by the deadline to file the instant application pursuant to Section 73.3613 of the Commission’s rules, 47 C.F.R. § 73.3613. Denali Media Juneau intends to promptly amend this exhibit as appropriate once the outstanding questionnaire responses are obtained.



Source: Warren Publications, *Cable and TV Station Coverage Atlas Map* (2013).