

EXHIBIT 15
TELEVISION DUOPOLY COMPLIANCE

This application seeks the Commission's consent to the assignment of the licenses of KMPH-TV, Visalia, California and KFRE-TV, Sanger, California from their commonly-owned licensees, KMPH(TV) License, LLC and KFRE(TV) License, LLC, to entities commonly controlled by TTBG, LLC ("TTBG"). KMPH-TV and KFRE-TV are assigned by Nielsen Media Research to the Fresno-Visalia, CA Designated Market Area ("DMA").

As presently in effect, Section 73.3555(b) of the Commission's rules permits common ownership of two television stations in the same DMA if:

1. at least eight independently owned and operating commercial and/or noncommercial television stations, the Grade B contours¹ of which overlap with the Grade B contour of at least one station in the proposed combination, will remain post-merger in the DMA; and
2. at least one of the stations to be commonly owned is not among the top four stations in the market, ranked according to audience share by Nielsen or a comparable rating service at the time the application is filed.

According to the Media Bureau's CDBS DTV Station Search, the following television stations comprise the Fresno-Visalia DMA :

	Call Sign	Community	Licensee
1	KAIL(TV)	FRESNO, CA	TRANS AMERICA BROADCASTING CORP.
2	KFRE-TV	SANGER, CA	KFRE (TV) LICENSE, LLC (Pappas Subsidiary)
	KMPH-TV	VISALIA, CA	KMPH (TV) LICENSE, LLC (Pappas Subsidiary)
3	KFSN-TV	FRESNO, CA	KFSN TELEVISION, LLC
4	KFTV(TV)	HANFORD, CA	KFTV LICENSE PARTNERSHIP, G.P. (Univision Subsidiary)
	KTFF-TV	PORTERVILLE, CA	TELEFUTURA FRESNO LLC (Univision Subsidiary)
5	KGMC(TV)	CLOVIS, CA	COCOLA BROADCASTING COMPANIES LLC
6	KGPE(TV)	FRESNO, CA	HIGH PLAINS BROADCASTING LICENSE COMPANY LLC
7	KNSO(TV)	MERCED, CA	NBC TELEMUNDO LICENSE CO.
8	KNXT(TV)	VISALIA, CA	DIOCESE OF FRESNO EDUCATION CORP.
9	KSEE(TV)	FRESNO, CA	KSEE LICENSE, INC.
10	KVPT(TV)	FRESNO, CA	VALLEY PUBLIC TELEVISION, INC.

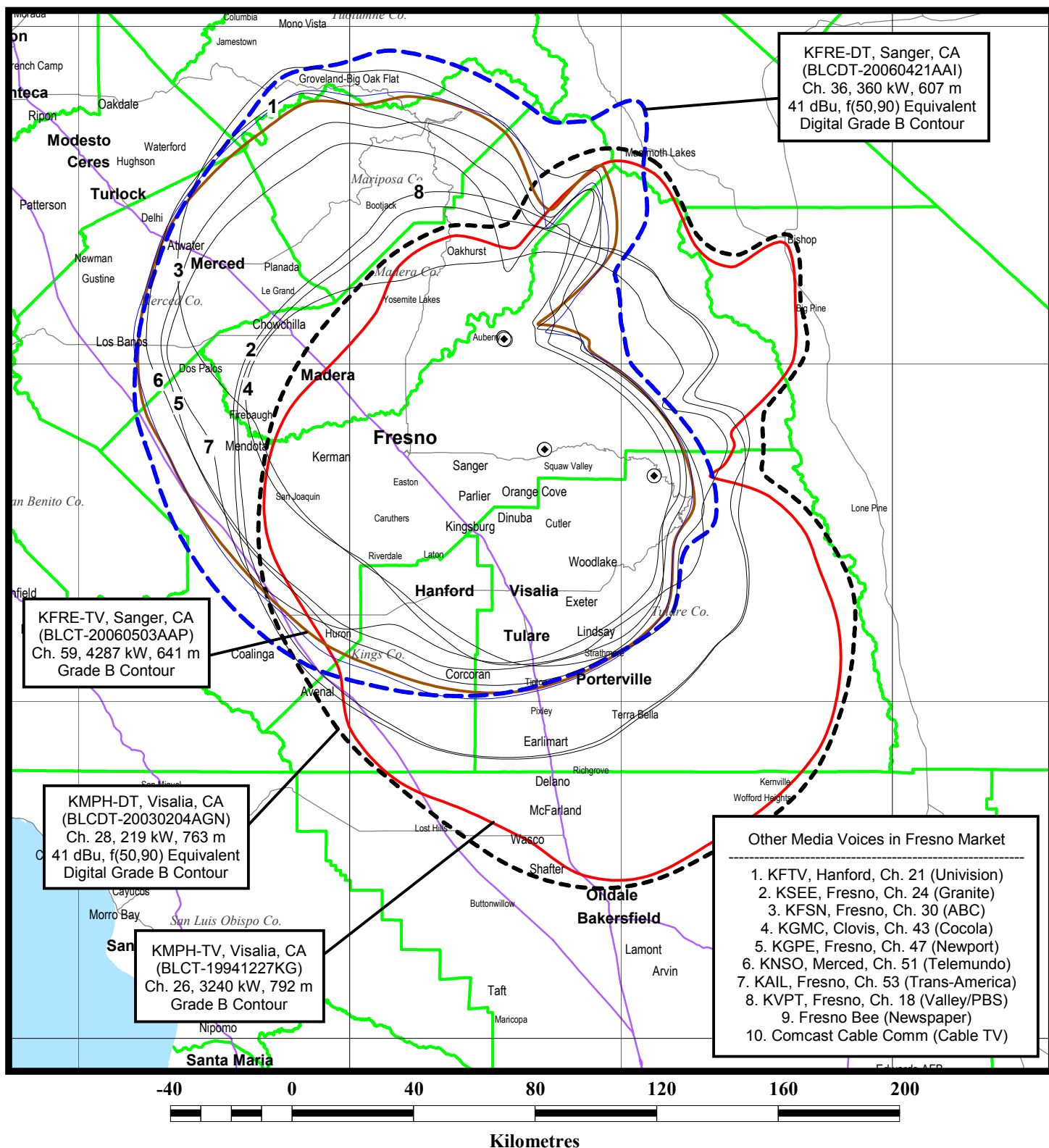
As seen above, ten (10) independently owned and operating commercial and noncommercial television stations will remain in the Fresno-Visalia DMA following the proposed assignment of the existing KMPH-TV/KFRE-TV combination. Attachment A

¹ Because the Commission has not yet established the appropriate digital contour for multiple ownership analysis, only the analog Grade B contours were considered in assessing the KMPH/KFRE-TV combination. For the Commission's reference, the digital noise-limited contours for KMPH and KFRE-TV are also depicted in Attachment A.

hereto shows that the Grade B contours of eight independently owned stations in the Fresno-Visalia DMA overlap the Grade B contours of either KMPH-TV and/or KFRE-TV.

Attachment B hereto is an excerpt from the November 2008 Nielsen Station Index showing Monday-Sunday, 9:00 am-12:00 midnight audience shares for stations in the top six stations in the Fresno DMA. As shown on this attachment, KMPH has the second largest audience share, and KFRE-TV has the sixth largest audience share in the DMA. Therefore, TTBG may own both stations under the Commission's television duopoly rule.

ATTACHMENT A



LOCAL TELEVISION MULTIPLE OWNERSHIP ANALYSIS MAP FOR KMPH-TV(DT) AND KFRE-TV(DT)

ATTACHMENT B

Extract from November 2008 Nielsen Station Index

Market:	Fresno		
Timeperiod:	M-Su/9a-12m		
Demo:	RP12+		
	<u>Nov'08 Share</u>	<u>May'08 Share</u>	<u>Feb'08 Share</u>
KFSN	12.5	12.8	11.3
KMPH	8.6	9.0	11.8
KGPE	7.8	6.9	5.4
KSEE	6.0	4.3	5.4
KAIL	1.7	1.1	1.0
KFRE	1.3	2.1	1.5
Levels	23.2	18.8	20.3