

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.

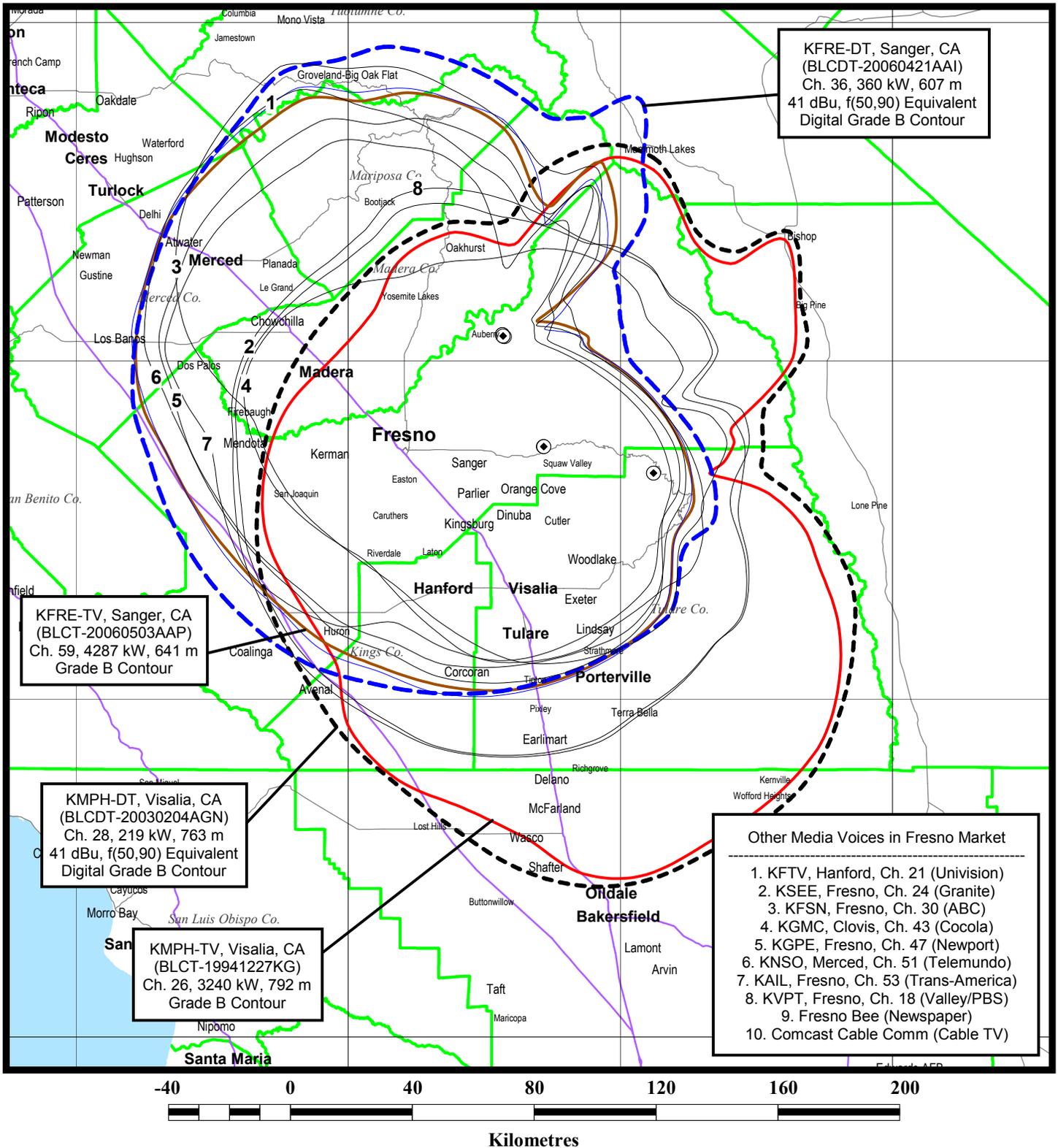
As seen above, ten (10) independently owned and operating commercial and noncommercial television stations will remain in the Fresno-Visalia DMA following the proposed assignment of the existing KMPH-TV/KFRE-TV combination. Attachment A

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



KFRE-DT, Sanger, CA
 (BLCDT-20060421AAI)
 Ch. 36, 360 kW, 607 m
 41 dBu, f(50,90) Equivalent
 Digital Grade B Contour

KFRE-TV, Sanger, CA
 (BLCT-20060503AAP)
 Ch. 59, 4287 kW, 641 m
 Grade B Contour

KMPH-DT, Visalia, CA
 (BLCDT-20030204AGN)
 Ch. 28, 219 kW, 763 m
 41 dBu, f(50,90) Equivalent
 Digital Grade B Contour

KMPH-TV, Visalia, CA
 (BLCT-19941227KG)
 Ch. 26, 3240 kW, 792 m
 Grade B Contour

- Other Media Voices in Fresno Market
1. KFTV, Hanford, Ch. 21 (Univision)
 2. KSEE, Fresno, Ch. 24 (Granite)
 3. KFSN, Fresno, Ch. 30 (ABC)
 4. KGMC, Clovis, Ch. 43 (Cocola)
 5. KGPE, Fresno, Ch. 47 (Newport)
 6. KNSO, Merced, Ch. 51 (Telemundo)
 7. KAIL, Fresno, Ch. 53 (Trans-America)
 8. KVPT, Fresno, Ch. 18 (Valley/PBS)
 9. Fresno Bee (Newspaper)
 10. Comcast Cable Comm (Cable TV)

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		
Timperiod:	M-Su/9a-12m		
Demo:	RP12+		
	Nov'08 Share	May'08 Share	Feb'08 Share
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