

**Exhibit 15  
FCC Form 314  
Section III, Question 6(b)**

**Multiple Ownership**

KASA-TV is in the Nielsen-defined Albuquerque-Santa Fe, New Mexico Designated Market Area (DMA). LIN of New Mexico, LLC is also the licensee of stations KRQE, Albuquerque, and KBIM-TV, Roswell, New Mexico, which is in the Albuquerque-Santa Fe DMA. A related entity, LIN of Colorado, LLC, is the licensee of station KREZ-TV, Durango, Colorado, which is also in the Albuquerque-Santa Fe DMA. KBIM-TV and KREZ-TV operate as satellites of KRQE.

Section 73.3555(b) of the Commission's Rules<sup>1</sup> permits common ownership of television stations in the same DMA if (1) the Grade B contours of the stations do not overlap, or (2):

“[a]t the time the application to acquire . . . the station(s) is filed, at least one of the stations is not ranked among the top four stations in the DMA, based on the most recent all-day (9:00 a.m.-midnight) audience share as measured by Nielsen Media Research . . . and [a]t least 8 independently owned and operating full-power commercial and noncommercial stations would remain post-merger in the DMA in which the communities of license of the TV stations in question are located.”

As shown in the attached map (Attachment 1), the Grade B contour of KASA-TV does not overlap with the Grade B contours of KREZ-TV or KBIM-TV. Therefore, common

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<sup>1</sup> Because the Commission's 2003 revisions to its local television ownership rules were stayed by the Third Circuit, the pre-2003 version of Section 73.3555(b) remains in effect and all references are to that version. See Public Notice, *Media Bureau to Terminate Temporary Broadcast Station Application Freeze*, 18 FCC Rcd 18631 (2003); *Prometheus Radio Project v. FCC*, 373 F.3d 372 (3d Cir. 2004), *cert. denied*, 125 S. Ct. 2902 (2005).

ownership of KASA-TV with those stations is permitted under the Commission's rules. Further, satellite stations are exempted from the Commission's local ownership rules. Report and Order, *Review of the Commission's Regulations Governing Television Broadcasting*, 14 FCC Rcd 12903, 12943 (1999).

LIN of New Mexico may also own both KASA-TV and KRQE because KASA-TV, according to the current Nielsen ratings for the Albuquerque-Santa Fe DMA, is not among the top-four stations in the market. Attachment 2 is a Declaration of Tony Marinaro, Director of LIN Television Audience Research. Mr. Marinaro declares that, according to the Nielsen Media Research's May 2006 VIEWERS IN PROFILE REPORT for the Albuquerque-Santa Fe DMA, which contains the most up-to-date ratings information available for the market, KASA was ranked fifth in television household ratings from Monday to Sunday, 9:00 a.m. to midnight.

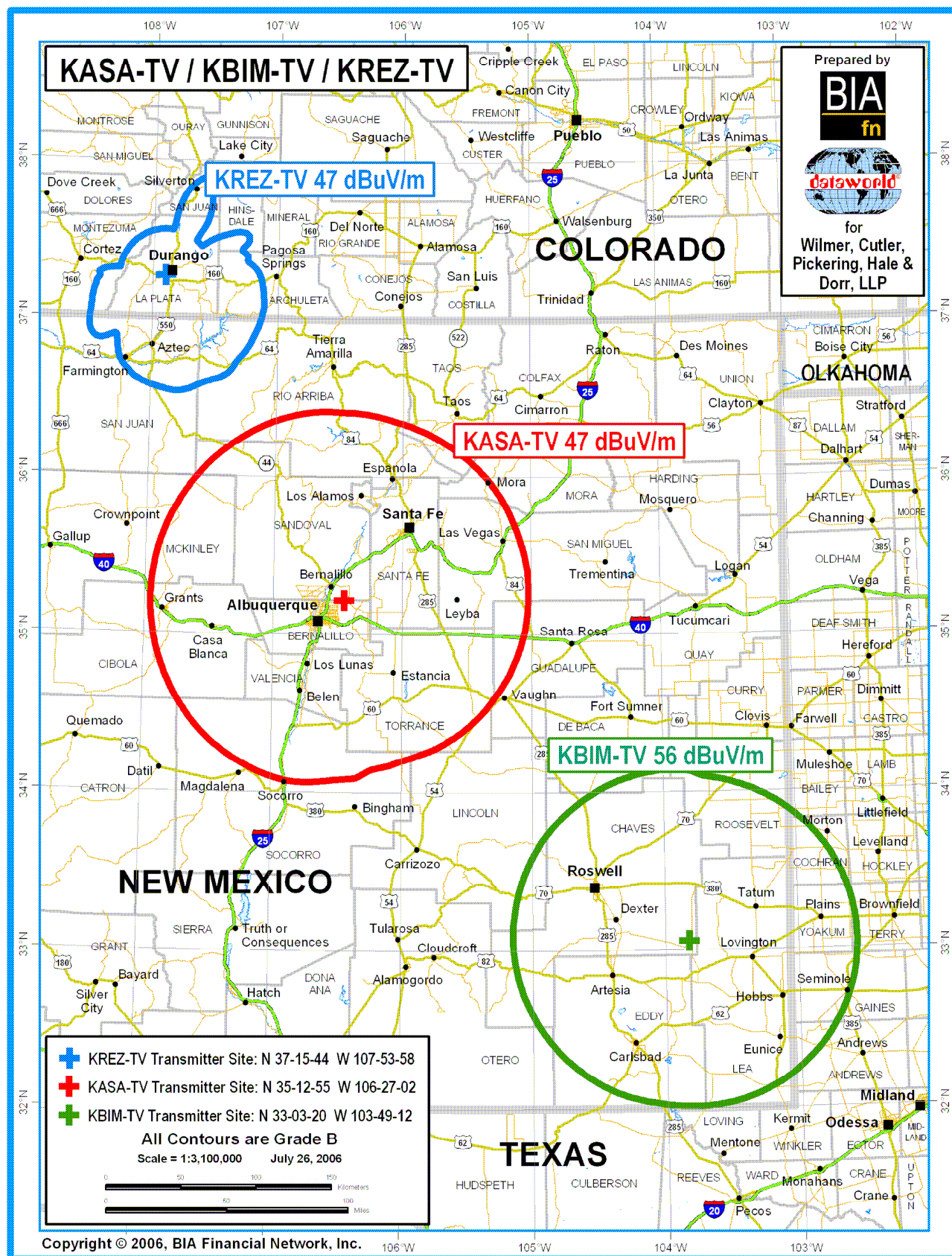
Further, after the consummation of this transaction, there will be ten remaining independently owned and operating commercial and noncommercial television stations whose Grade B contours overlap with the contours of KASA-TV or KRQE. Those stations are:

<b>Station(s)</b>	<b>Owner</b>
KASY-TV, KWBQ	ACME Television
KLUZ-TV	Entravision
KNAT-TV	Trinity Broadcasting
KOAT-TV	Hearst-Argyle Television
KOB-TV	Hubbard Broadcasting
KRQE, KASA-TV	LIN Television
KTFQ-TV	Univision
KCFH	Son Broadcasting

KAZQ	Alpha-Omega Broadcasting
KNME-TV	University of New Mexico

Common ownership of KRQE and KASA-TV is, therefore, permitted under the Commission's Rules because KASA-TV is not among the top-four rated stations in the market and, after consummation of this transaction, there will remain at least eight independent television "voices" in the Albuquerque-Santa Fe DMA. This transaction, therefore, fully complies with the Commission's ownership rules.

# **ATTACHMENT 1**



## **Attachment 2**

### **DECLARATION**

I, Tony Marinaro, am Director of LIN Television Audience Research. I do state and declare under penalty of perjury as follows:

I have analyzed the audience share data reported by Nielsen Media Research for the Albuquerque, New Mexico Designated Market Area (DMA) based on Nielsen's May 2006 VIEWERS IN PROFILE REPORT. That data is the most current ratings information for the Albuquerque DMA available as of this date.

Examining the viewing data from that publication for all television households in the DMA for viewing Monday to Sunday, from 9 a.m. to midnight, KASA-TV was the fifth ranked station in the Albuquerque DMA, ranking behind stations KRQE, KOAT-TV, KOB-TV and KLUZ-TV.



Tony Marinaro

July 26, 2006