

AMENDMENT TO SCRIPPS FAMILY AGREEMENT

The E. W. Scripps Company, an Ohio corporation (the "Company"), and the undersigned (the "Family Shareholders") are parties to the Scripps Family Agreement, dated October 15, 1992, as amended (the "Family Agreement").

WHEREAS, the Company believes it would be in the best interests of its shareholders to acquire the television and radio broadcast properties (the "Journal Broadcast Properties") of Journal Communications, Inc., a Wisconsin corporation ("Journal");

WHEREAS, among the Journal Broadcast Properties, Journal owns a television station and an AM/FM radio station in Milwaukee, Wisconsin (the "Milwaukee Broadcast Properties");

WHEREAS, in addition to the Milwaukee Broadcast Properties, Journal owns, pursuant to an exemption from the television/radio and newspaper cross-ownership prohibition under the rules of the Federal Communications Commission (the "FCC"), a daily newspaper in Milwaukee, Wisconsin, published under the masthead *Milwaukee Journal Sentinel*, as well as several community newspapers in Wisconsin (collectively, with the *Milwaukee Journal Sentinel*, the "Journal Newspapers");

WHEREAS, Journal's television/radio and newspaper cross-ownership exemption is not transferable to a new owner of the Journal Broadcast Properties and the Journal Newspapers, and thus the Company cannot own both the *Milwaukee Journal Sentinel* and the Journal Broadcast Properties;

WHEREAS, to facilitate the Company's acquisition of the Journal Broadcast Properties, the Company and certain of its subsidiaries, and Journal and certain of its subsidiaries, have entered into a Master Transaction Agreement, dated July 31, 2014 (the "Transaction Agreement") that is designed to address the aforesaid cross-ownership issue in a way that will enable the Company to own the Journal Broadcast Properties, including the Milwaukee Broadcast Properties, but not the Journal Newspapers;

WHEREAS, the Transaction Agreement contemplates the following transactions (the "Transactions"): (i) the spin-off by Journal to its shareholders (the "Journal Shareholders") of the stock of a company owning, directly or indirectly, the Journal Newspapers ("Journal Spinco"); (ii) the spin-off by the Company to its shareholders (the "Scripps Shareholders") of the stock of a company ("Scripps Spinco") owning, directly or indirectly, all of the newspaper properties in which the Company or its subsidiaries own interests; (iii) the mergers of Journal Spinco and Scripps Spinco with separate subsidiaries of Boat NP Newco, Inc., Wisconsin corporation, currently owned by the Company and Journal, to form a new publicly traded newspaper company ("Journal Newspaper Newco"); and (iv) following consummation of Transactions (i), (ii) and (iii), the merger of Journal into a wholly owned subsidiary of the Company pursuant to which the Company will acquire the Journal Broadcast Properties;

WHEREAS, in consummation of Transactions (i), (ii), and (iii), Journal Newspaper Newco will issue the same class of common shares to the Journal Shareholders as it does to the Scripps Shareholders (including the Family Shareholders, who will thus not control Journal Newspaper Newco), to facilitate compliance with the rules of the FCC, including the television/radio and newspaper cross-ownership rules;

WHEREAS, in consummation of Transaction (iv), the Company will issue Class A Common Shares to the Journal Shareholders pursuant to the merger of Journal into a wholly owned subsidiary of the Company, and following such merger, the Family Shareholders will continue to control the Company as the owners of the currently outstanding Common Voting Shares of the Company;

WHEREAS, to assist in demonstrating to the FCC that the Family Shareholders do not control Journal Newspaper Newco and to thereby facilitate the consummation of the Transactions, the Company and the Family Shareholders believe it to be in their mutual best interests to amend the Family Agreement to provide that any and all shares of Journal Newspaper Newco to be owned by the Family Shareholders will not be subject to the Family Agreement;

NOW, THEREFORE, in consideration of the mutual agreements set forth hereinabove, and intending to be legally bound hereby, each Family Shareholder hereby agrees as follows:


1. Section 17(a)(ii) of the Family Agreement is hereby amended by adding at the end thereof the following sentence: "Notwithstanding anything to the contrary set forth in this Section 17(a)(ii), the Family Agreement shall not apply to any shares of capital stock of any entity (or successor entity) owning the newspapers published by the Company or its subsidiaries and the newspapers published by Journal Communications, Inc. or its subsidiaries, including the *Milwaukee Journal Sentinel*, that become owned by any Family Shareholder at any time hereafter, and such entity (or successor entity) shall not be considered a successor or spun-off subsidiary as such terms are used in this Section 17(a)(ii)."

2. Except as amended hereby, the Family Agreement remains in full force and effect.

3. If the Transactions are not consummated on or before December 31, 2015, this 2014 Amendment shall be null and void.

Executed on July 31, 2014.

THE E. W. SCRIPPS COMPANY

By: 
William Appleton
Senior Vice President and General Counsel

FAMILY SHAREHOLDERS:

Adam R. Scripps
Edward W. Scripps, Jr.
Jimmy R. Scripps
Margaret E. Scripps (Klenzing)
Marilyn J. Scripps (Wade)
William A. Scripps
Rebecca Scripps Brickner
Corina S. Granado
Mary Ann S. Sanchez

FAMILY SHAREHOLDERS (cont'd)

Scripps Family 1992 Revocable Trust, Dated 06-09-92 - William H. Scripps
Virginia S. Vasquez
Charles E. Scripps, Jr.
Peter M. Scripps
Barbara Victoria Scripps Evans
Paul K. Scripps
Peter R. La Dow
John P. Scripps Trust under agreement dated 2/10/77 FBO Barbara Scripps Evans
John P. Scripps Trust FBO Paul K. Scripps under agreement dated 2/10/77
John P. Scripps Trust under agreement dated 2/10/77 FBO Peter M. Scripps
John P. Scripps Trust Exempt Trust under agreement dated 2/10/77
Douglas A. Evans 1983 Trust
John Peter Scripps 1983 Trust
Ellen McRae Scripps 1983 Trust
John P. Scripps Trust FBO Douglas A. Evans under agreement dated 12/28/84
John P. Scripps Trust FBO Ellen McRae Scripps under agreement dated 12/28/84
John P. Scripps Trust FBO John Peter Scripps under agreement dated 12/28/84
The Marital Trust of the La Dow Family Trust (subtrust of La Dow Family Trust)
Victoria S. Evans Trust under agreement dated 5/19/2004
Anne M. La Dow Trust under Agreement dated 10/27/2011
Douglas A. Evans
Thomas S. Evans
Julia Scripps Heidt
Charles Kyne McCabe
J. Sebastian Scripps
Wendy E. Scripps
Cynthia J. Scripps
Mary Peirce
Eaton M. Scripps
Anne La Dow
Molly E. McCabe
Elizabeth A. Logan
Nackey E. Scagliotti
Eli W. Scripps
Gerald J. Scripps
Jonathan L. Scripps
John P. Scripps
Megan Scripps Tagliaferri
Estate of Edith L. Tomasko

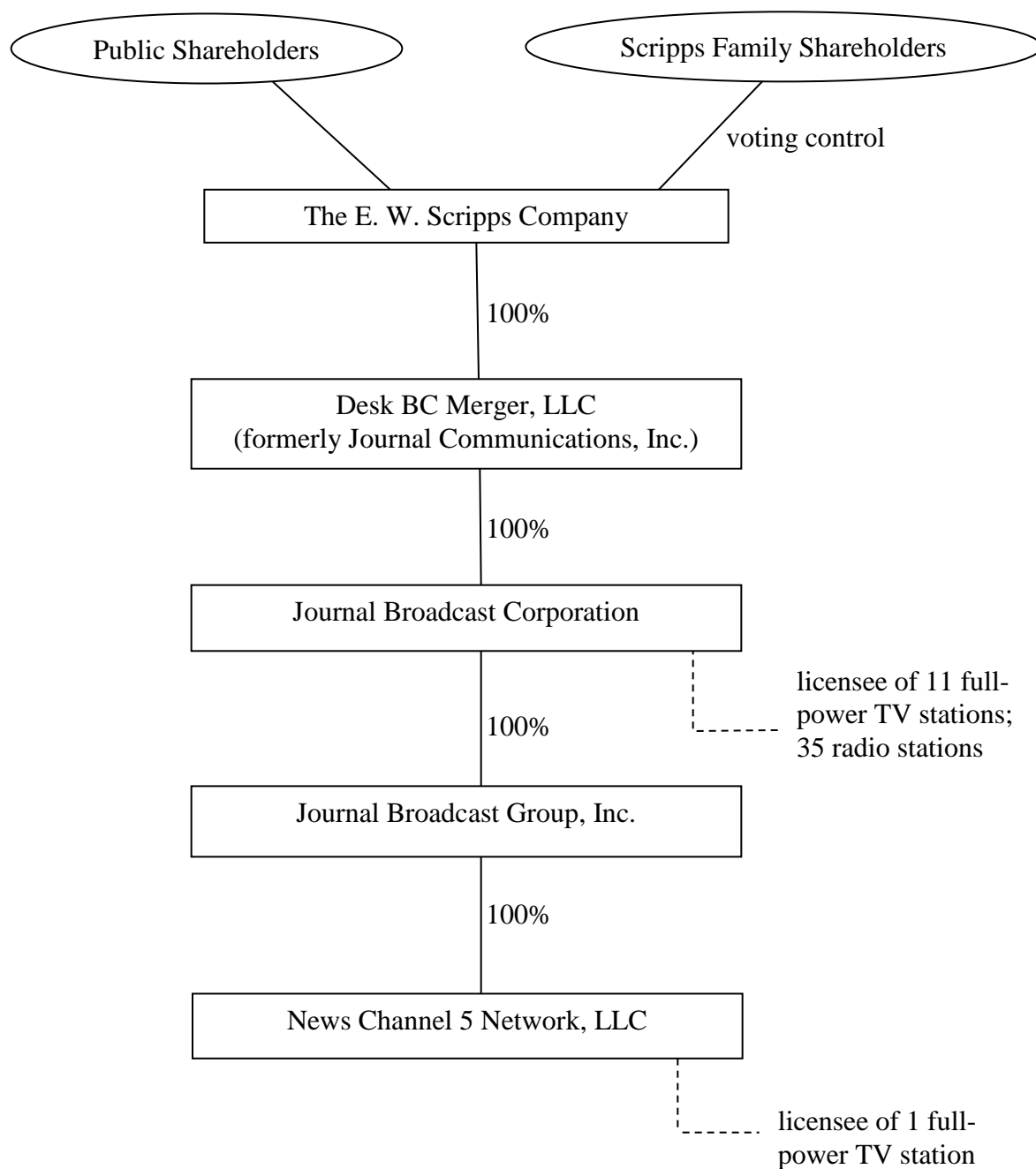
FAMILY SHAREHOLDERS (cont'd)

Estate of Robert P. Scripps, Jr.
Ellen McRae Scripps Kaheny
Thomas S. Evans Irrevocable Trust under agreement dated 11/13/12
La Dow Family Trust under agreement dated 6/29/2004
The Peter M. Scripps Trust under agreement dated 11/13/2002
The Paul K. Scripps Family Revocable Trust
Careen Cardin
Cody Dubuc
Kathy Scripps
Samuel D.F. Scripps
Welland Scripps
Wesley Scripps
William A. Scripps Jr
John Peter Scripps 2013 Revocable Trust
R. Michael Scagliotti
Charles L. Barmonde
Anthony S. Granado
Ellen Granado
Geraldine Scripps Granado
Manuel E. Granado
Raymundo H. Granado Jr.

By: **Eaton Scripps**
Eaton M. Scripps, Attorney-in-Fact for the
Family Shareholders listed above on pages 2, 3, and 4 hereof

Digitally signed by Eaton Scripps
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Date: 2014.07.29 12:49:44 -06'00'

**POST-CLOSING OWNERSHIP STRUCTURE
OF JOURNAL'S BROADCAST STATIONS**



Tulsa, OK Radio-Television Cross-Ownership Showing

Journal owns five radio stations in the Tulsa, OK market: KXBL(FM), KHTT(FM), KBEZ(FM), KVOO(FM), and KFAQ(AM). Scripps owns station KRJH-TV, Tulsa, OK.

The radio-television cross-ownership rule is triggered because the noise limited service contour (“NLSC”) of station KRJH-TV encompasses the communities of license of each of Journal’s five radio stations.⁸

Once the radio-television cross-ownership rule is triggered by contour encompassment, the Commission determines compliance with the rule on a Nielsen Audio Metro basis. All of Journal’s radio stations are located in the Tulsa, Oklahoma Nielsen Audio Metro.

Section 73.3555 (c)(2)(i)(B) of the Commission’s rules provides that in a market where at least 20 independent voices will remain following the proposed combination, to the extent permitted by the local radio ownership rule, an entity may hold attributable interests in one television station and seven radio stations. As shown on the attached charts, following the combination there will be at least 24 independent voices in the market. Therefore, the 20 voice test is satisfied, and the ownership by Scripps of five radio stations and one television station is permitted under the radio-television cross-ownership rule.

⁸ Although Section 73.3555 (c) of the Commission’s rules references the Grade A contour of a television station, the Commission has determined that the digital NLSC may be used in lieu of the former analog Grade A contour in analyzing the applicability of the radio-television cross ownership rule. *See Application for Transfer of Control of Nassau Broadcasting II, LLC*, 25 FCC Rcd 1851(MB 2010); *New Rushmore Radio, Inc.*, 29 FCC Rcd 3265, 3266 n.6 (MB 2014).

Tulsa, Oklahoma Radio Voices

Voice Count	CALLS	AM, FM or FX	City of License	State of License	Parent	AM Frequency	FM Frequency	Power-Day/FM	Power-Night	HAAT	Class
1	KCXR	FM	Taft	OK	ABS Communications Inc	0	100.3	3.9	0	410	A
1	KEMX	FM	Locust Grove	OK	ABS Communications Inc	0	94.5	2.3	0	367	A
1	KTFR	FM	Chelsea	OK	ABS Communications Inc	0	100.5	6	0	328	A
2	KJMU	AM	Sand Springs	OK	Birach Broadcasting Corporation	1340	0	0.5	1	0	C
3	KAKC	AM	Tulsa	OK	CC Media Holdings Inc	1300	0	5	1	0	B
3	KIZS	FM	Collinsville	OK	CC Media Holdings Inc	0	101.5	6.2	0	656	C3
3	KMOD	FM	Tulsa	OK	CC Media Holdings Inc	0	97.5	100	0	1486	C
3	KTBT	FM	Broken Arrow	OK	CC Media Holdings Inc	0	92.1	27	0	656	C2
3	KTBZ	AM	Tulsa	OK	CC Media Holdings Inc	1430	0	25	5	0	B
3	KTGX	FM	Owasso	OK	CC Media Holdings Inc	0	106.1	100	0	1322	C
4	KJSR	FM	Tulsa	OK	Cox Media Group	0	103.3	100	0	1296	C
4	KRAV	FM	Tulsa	OK	Cox Media Group	0	96.5	100	0	1486	C
4	KRMG	AM	Tulsa	OK	Cox Media Group	740	0	50	25	0	B
4	KRMG	FM	Sand Springs	OK	Cox Media Group	0	102.3	50	0	492	C2
4	KWEN	FM	Tulsa	OK	Cox Media Group	0	95.5	100	0	1486	C
5	KDIM	FM	Coweta	OK	Creative Educational Media Corp Inc	0	88.1	100	0	551	C1
5	KNYD	FM	Broken Arrow	OK	Creative Educational Media Corp Inc	0	90.5	100	0	1483	C
6	KREK	FM	Bristow	OK	Family Worship Center Church Inc.	0	104.9	5	0	351	A
7	KCFO	AM	Tulsa	OK	Friendship Broadcasting LP	970	0	2.5	1	0	B
8	KXTD	AM	Wagoner	OK	Gaytan-Galvan LLC	1530	0	5	0	0	D
9	KBEZ	FM	Tulsa	OK	Journal Communications Inc	0	92.9	100	0	1319	C0
9	KFAQ	AM	Tulsa	OK	Journal Communications Inc	1170	0	50	50	0	A
9	KHTT	FM	Muskogee	OK	Journal Communications Inc	0	106.9	100	0	1011	C0
9	KVOO	FM	Tulsa	OK	Journal Communications Inc	0	98.5	100	0	1227	C
9	KXBL	FM	Henryetta	OK	Journal Communications Inc	0	99.5	100	0	981	C1
10	KEOR	AM	Catoosa	OK	La Zeta 95.7 Inc	1120	0	10	0	0	D
11	KMUS	AM	Sperry	OK	Perez, Antonio	1380	0	7	0.25	0	B
12	KGTO	AM	Tulsa	OK	Perry Publishing & Broadcasting Company	1050	0	1	0.022	0	D
12	KJMM	FM	Bixby	OK	Perry Publishing & Broadcasting Company	0	105.3	10	0	879	C2
13	KPGM	AM	Pawhuska	OK	Potter, Kevin & Dorea	1500	0	0.5	0	0	D
14	KMYZ	FM	Pryor	OK	Stephens Family Limited Partnership	0	104.5	70	0	1129	C1
14	KTSO	FM	Glenpool	OK	Stephens Family Limited Partnership	0	94.1	100	0	691	C1
14	KXOJ	FM	Sapulpa	OK	Stephens Family Limited Partnership	0	100.9	15	0	423	C3
14	KYAL	FM	Muskogee	OK	Stephens Family Limited Partnership	0	97.1	100	0	1969	C
14	KYAL	AM	Sapulpa	OK	Stephens Family Limited Partnership	1550	0	2.5	0.04	0	D
14	KBIX	AM	Muskogee	OK	Stephens Family Limited Partnership	1490	0	0.45	0.45	0	C
15	KOSG	FM	Pawhuska	OK	Tallgrass Broadcasting LLC	0	103.9	6	0	328	A
16	KTUZ	AM	Claremore	OK	Tyler Media Group	1270	0	5	1	0	B
16	KZLI	AM	Catoosa	OK	Tyler Media Group	1570	0	1	0	0	D
17	KRSC	FM	Claremore	OK	University of Oklahoma Board of Regents/Rogers St	0	91.3	2.2	0	364	A
18	KWGS	FM	Tulsa	OK	University of Tulsa	0	89.5	50	0	1066	C1
18	KWTU	FM	Tulsa	OK	University of Tulsa	0	88.7	5	0	1066	C2

Tulsa, Oklahoma TV Voices

Voice Count	CALLS	Channel	DTV Channel	Lic. City of License	Lic. County	Lic. State of License	Parent	Lic. Power	Lic. HAAT	Type Service
1	KTPX-TV	44	28	Okmulgee	Okmulgee	OK	CIG Media LLC	5000	909	MAIN
N/A	KMYT-TV	41	42	Tulsa	Tulsa	OK	Cox Media Group	1350	1509	MAIN
N/A	KOKI-TV	23	22	Tulsa	Tulsa	OK	Cox Media Group	3160	1312	MAIN
N/A	KJRH-TV	2	8	Tulsa	Tulsa	OK	EW Scripps Co	100	1831	MAIN
2	KOTV-DT	6	45	Tulsa	Tulsa	OK	Griffin Communications	100	1880	MAIN
2	KQCW-DT	19	20	Muskogee	Muskogee	OK	Griffin Communications	5000	827	MAIN
3	KWHB	47	47	Tulsa	Tulsa	OK	LeSEA Broadcasting Corp	835	1509	MAIN
4	KOED-TV	11	11	Tulsa	Tulsa	OK	Oklahoma Educational Television Authority	316	1709	PUB
4	KOET	3	31	Eufaula	Mc Intosh	OK	Oklahoma Educational Television Authority	100	1309	PUB
5	KTUL	8	10	Tulsa	Tulsa	OK	Sinclair Broadcast Group Inc	316	1896	MAIN
6	KDOR-TV	17	17	Bartlesville	Washington	OK	Trinity Broadcasting Network Inc	3980	1037	MAIN
7	KGEB	53	49	Tulsa	Tulsa	OK	University Broadcasting Inc	1780	597	MAIN
N/A	KRSU-TV	35	36	Claremore	Rogers	OK	University of Oklahoma Board of Regents/Rogers St	2550	837	PUB

7 Independent TV Voices

Milwaukee, WI Radio-Television Cross-Ownership Showing

Journal owns two radio stations – WTMJ(AM) and WLWK(FM) – and one television station – WTMJ-TV – in the Milwaukee, Wisconsin market. The radio-television cross-ownership rule is triggered because the noise limited service contour (“NLSC”) of station WTMJ-TV encompasses Milwaukee, the community of license of the radio stations.⁹

Once the radio-television cross-ownership rule is triggered by contour encompassment, the Commission determines compliance with the rule on a Nielsen Audio Metro basis. Both of Journal’s radio stations are located in the Milwaukee Nielsen Audio Metro.

Section 73.3555(c)(2)(ii) of the Commission’s rules provides that in a market where at least 10 independent voices will remain following the proposed combination, to the extent permitted by the local radio ownership rule, an entity may hold attributable interests in two television stations and four radio stations. As shown on the attached chart, following the consummation of the proposed transfer of control there will be at least 31 independent voices (23 independent radio voices and 8 independent TV voices) in the market. Therefore, the 10 voice test is satisfied, and the ownership by Scripps of one television station and two radio stations is permitted under the radio-television cross-ownership rule.

⁹ Although Section 73.3555 (c) of the Commission’s rules references the Grade A contour of a television station, the Commission has determined that the digital NLSC may be used in lieu of the former analog Grade A contour in analyzing the applicability of the radio-television cross ownership rule. *See Application for Transfer of Control of Nassau Broadcasting II, LLC*, 25 FCC Rcd 1851(MB 2010); *New Rushmore Radio, Inc.*, 29 FCC Rcd 3265, 3266 n.6 (MB 2014).

Milwaukee, Wisconsin Radio Voices

Voices	CALLS	AM, FM or FX	City of License	State of License	Parent	AM Frequency	FM Frequency	Power-Day/FM	Power-Night	HAAT	Class
1	WBKV	AM	West Bend	WI	Bliss Communications Inc	1470	0	2.5	2.5	0	B
1	WBWI	FM	West Bend	WI	Bliss Communications Inc	0	92.5	17.5	0	538	B
1	WEZY	FM	Racine	WI	Bliss Communications Inc	0	92.1	2.7	0	492	A
1	WRJN	AM	Racine	WI	Bliss Communications Inc	1400	0	1	1	0	C
2	WBSD	FM	Burlington	WI	Burlington Area School District	0	89.1	0.21	0	92	A
3	WCCX	FM	Waukesha	WI	Carroll University	0	104.5	0.013	0	49	D
4	WISN	AM	Milwaukee	WI	CC Media Holdings Inc	1130	0	50	10	0	B
4	WKKV	FM	Racine	WI	CC Media Holdings Inc	0	100.7	50	0	499	B
4	WMIL	FM	Waukesha	WI	CC Media Holdings Inc	0	106.1	12	0	997	B
4	WOKY	AM	Milwaukee	WI	CC Media Holdings Inc	920	0	5	1	0	B
4	WRIT	FM	Milwaukee	WI	CC Media Holdings Inc	0	95.7	34	0	610	B
4	WRNW	FM	Milwaukee	WI	CC Media Holdings Inc	0	97.3	15.5	0	912	B
5	WIL	FM	Union Grove	WI	Digity LLC	0	95.1	50	0	384	B
6	WLVE	FM	Mukwonago	WI	Educational Media Foundation	0	105.3	1.65	0	633	A
7	WJTI	AM	West Allis	WI	El Sol Broadcasting LLC	1460	0	1	0.24	0	B
8	WMYX	FM	Milwaukee	WI	Entercom	0	99.1	50	0	449	B
8	WSSP	AM	Milwaukee	WI	Entercom	1250	0	5	5	0	B
8	WXSS	FM	Wauwatosa	WI	Entercom	0	103.7	19.5	0	843	B
9	WMWK	FM	Milwaukee	WI	Family Stations Inc	0	88.1	1.1	0	906	B1
10	WAUK	AM	Jackson	WI	Good Karma Broadcasting LLC	540	0	0.4	0.4	0	B
10	WRRD	AM	Waukesha	WI	Good Karma Broadcasting LLC	1510	0	23	0	0	D
10	WZTI	AM	Greenfield	WI	Good Karma Broadcasting LLC	1290	0	5	5	0	B
11	WLVK	FM	Milwaukee	WI	Journal Communications Inc	0	94.5	14	0	955	B
11	WTMJ	AM	Milwaukee	WI	Journal Communications Inc	620	0	50	10	0	B
12	WGLB	AM	Elm Grove	WI	Kinlow, Joel J.	1560	0	0.185	0.25	0	B
13	WYMS	FM	Milwaukee	WI	Milwaukee Board of School Directors	0	88.9	1.45	0	948	B1
14	WLDB	FM	Milwaukee	WI	Milwaukee Radio Alliance LLC	0	93.3	16	0	886	B
14	WLUM	FM	Milwaukee	WI	Milwaukee Radio Alliance LLC	0	102.1	8.8	0	843	B
15	WMSE	FM	Milwaukee	WI	Milwaukee School of Engineering	0	91.7	3.2	0	131	A
16	WNOV	AM	Milwaukee	WI	Moore, Ivan Rene	860	0	0.25	0.005	0	D
17	WDDW	FM	Sturtevant	WI	NAP Broadcast Holdings LLC	0	104.7	4.2	0	338	A
18	WHQG	FM	Milwaukee	WI	Saga Communications Inc	0	102.9	50	0	427	B
18	WJMR	FM	Menomonee Falls	WI	Saga Communications Inc	0	98.3	4.9	0	364	A
18	WJYI	AM	Milwaukee	WI	Saga Communications Inc	1340	0	1	1	0	C
18	WKLH	FM	Milwaukee	WI	Saga Communications Inc	0	96.5	20	0	810	B
18	WNRG	FM	Brookfield	WI	Saga Communications Inc	0	106.9	4.4	0	381	A
19	WSJP	FM	Port Washington	WI	Starboard Media Foundation Inc D/B/A Relevant Radio	0	100.1	6	0	318	A
19	WSJP	AM	Sussex	WI	Starboard Media Foundation Inc D/B/A Relevant Radio	1640	0	10	1	0	B
20	WTKM	AM	Hartford	WI	Tomsun Media LLC	1540	0	0.5	0	0	D
20	WTKM	FM	Hartford	WI	Tomsun Media LLC	0	104.9	5.8	0	299	A
21	WUWM	FM	Milwaukee	WI	University of Wisconsin	0	89.7	13.5	0	948	B
22	WVCY	FM	Milwaukee	WI	VCY America Inc	0	107.7	43	0	528	B
23	WHAD	FM	Delafield	WI	Wisconsin Public Radio	0	90.7	72	0	682	B

Milwaukee, Wisconsin TV Voices

Voices	CALLS	Channel	DTV Channel	City of License	County	State of License	Parent	Lic. Power	Lic. HAAT	Type Service
1	WPXE-TV	55	40	Kenosha	Kenosha	WI	CIG Media LLC	5000	472	MAIN
2	WISN-TV	12	34	Milwaukee	Milwaukee	WI	Hearst Corporation, The	316	994	MAIN
N/A	WTMJ-TV	4	28	Milwaukee	Milwaukee	WI	Journal Communications Inc	100	1001	MAIN
3	WMVS	10	8	Milwaukee	Milwaukee	WI	Milwaukee Area Technical College District Board	223	1111	PUB
3	WMVT	36	35	Milwaukee	Milwaukee	WI	Milwaukee Area Technical College District Board	4790	1115	PUB
4	WIWN	68	5	Fond du Lac	Fond du Lac	WI	Pappas Telecasting Companies	4986	640	MAIN
5	WCGV-TV	24	25	Milwaukee	Milwaukee	WI	Sinclair Broadcast Group Inc	3020	1027	MAIN
5	WVTV	18	18	Milwaukee	Milwaukee	WI	Sinclair Broadcast Group Inc	5000	1007	MAIN
6	WITI	6	33	Milwaukee	Milwaukee	WI	Tribune Company	100	1001	MAIN
7	WWRS-TV	52	43	Mayville	Dodge	WI	Trinity Broadcasting Network Inc	5000	663	MAIN
N/A	WVCY-TV	30	22	Milwaukee	Milwaukee	WI	VCY America Inc	1070	961	MAIN
8	WDJT-TV	58	46	Milwaukee	Milwaukee	WI	Weigel Broadcasting Company	5000	1112	MAIN
8	WMLW-TV	49	48	Racine	Racine	WI	Weigel Broadcasting Company	2570	489	MAIN

8 Independent TV Voices

Tucson, AZ Radio-Television Cross-Ownership Showing

Journal owns four radio stations – KFFN(AM), KMXZ(FM), KQTH(FM) and KTGv(FM) – and two television stations – KGUN(TV) and KWBA(TV) – in the Tucson market. Three of the radio stations are licensed to Tucson, and station KTGv(FM) is licensed to Oracle, AZ. KGUN-TV is licensed to Tucson, and KWBA-TV is licensed to Sierra Vista.

The radio-television cross-ownership rule is triggered because the noise limited service contours (“NLSC”) of station KGUN-TV and station KWBA-TV encompass Tucson and Oracle.¹⁰

Once the radio-television cross-ownership rule is triggered by contour encompassment, the Commission determines compliance with the rule on a Nielsen Audio Metro basis. Three of Journal’s radio stations are located in the Tucson Nielsen Audio Metro. The fourth, KTGv(FM), Oracle, is located outside the Tucson Metro and indeed outside the Tucson DMA. KTGv’s 1 mV/m contour, however, encompasses all of the city of Tucson, KGUN-TV’s city of license. It does not encompass the city of Sierra Vista, KWBA-TV’s city of license, which is also located outside of the Tucson Nielsen Audio Metro. Nevertheless, for purposes of this application only, the applicants are treating the two television stations and four radio stations as being in the same Metro.

Section 73.3555(c)(2)(ii) of the Commission’s rules provides that in a market where at least 10 independent voices will remain following the proposed combination an entity may hold attributable interests in two television stations (to the extent permitted under the local television ownership rule) and four radio stations (to the extent permitted under the local radio ownership rule) in a market. As shown on the attached chart, following the combination there will be at least 23 independent voices (17 independent radio voices and 6 independent TV voices). Therefore, the 10 voice test is satisfied, and the ownership by Scripps of two television stations and four radio stations is permitted under the radio-television cross-ownership rule.

¹⁰ Although Section 73.3555 (c) of the Commission’s rules references the Grade A contour of a television station, the Commission has determined that the digital NLSC may be used in lieu of the former analog Grade A contour in analyzing the applicability of the radio-television cross ownership rule. *See Application for Transfer of Control of Nassau Broadcasting II, LLC*, 25 FCC Rcd 1851(MB 2010); *New Rushmore Radio, Inc.*, 29 FCC Rcd 3265, 3266 n.6 (MB 2014).

Tucson, Arizona Radio Voices

Voices	Call Signs	AM, FM or FX	City of License	State of License	Parent	AM Frequency	FM Frequency	Power-Day/FM	Power-Night	HAAT	Class
1	KAIC	FM	Tucson	AZ	Calvary Chapel of Tucson Inc	0	88.9	1.8	0	26	A
2	KMIY	FM	Tucson	AZ	CC Media Holdings Inc	0	92.9	93	0	2038	C
2	KNST	AM	Tucson	AZ	CC Media Holdings Inc	790	0	5	0.5	0	B
2	KOHT	FM	Marana	AZ	CC Media Holdings Inc	0	98.3	6	0	184	A
2	KRQQ	FM	Tucson	AZ	CC Media Holdings Inc	0	93.7	93	0	2011	C
2	KTZR	AM	Tucson	AZ	CC Media Holdings Inc	1450	0	1	1	0	C
2	KXEW	AM	South Tucson	AZ	CC Media Holdings Inc	1600	0	1	1	0	B
2	KYWD	FM	Green Valley	AZ	CC Media Holdings Inc	0	97.1	1.75	0	614	A
3	KKYZ	FM	Tanque Verde	AZ	Cochise Broadcasting LLC	0	101.1	24	0	161	C3
3	KXZK	FM	Vail	AZ	Cochise Broadcasting LLC	0	104.5	6	0	69	A
4	KCUB	AM	Tucson	AZ	Cumulus Media Inc	1290	0	1	1	0	B
4	KHYT	FM	Tucson	AZ	Cumulus Media Inc	0	107.5	92	0	2034	C
4	KIIM	FM	Tucson	AZ	Cumulus Media Inc	0	99.5	93	0	2038	C
4	KSZR	FM	Oro Valley	AZ	Cumulus Media Inc	0	97.5	6	0	305	A
4	KTUC	AM	Tucson	AZ	Cumulus Media Inc	1400	0	1	1	0	C
5	KRDX	FM	Vail	AZ	Desert West Air Ranchers Corp	0	98.5	3.9	0	410	A
6	KFLT	AM	Tucson	AZ	Family Life Communications Inc	830	0	50	1	0	B
6	KFLT	FM	Tucson	AZ	Family Life Communications Inc	0	88.5	1.5	0	377	A
7	KXCI	FM	Tucson	AZ	Foundation for Creative Broadcasting Inc	0	91.3	0.58	0	3527	C2
8	KCEE	AM	Tucson	AZ	Good News Radio Broadcasting Inc	690	0	0.25	0.003	0	D
8	KGMS	AM	Tucson	AZ	Good News Radio Broadcasting Inc	940	0	1	0.25	0	B
8	KVOI	AM	Cortaro	AZ	Good News Radio Broadcasting Inc	1030	0	10	1	0	B
9	KWFM	AM	South Tucson	AZ	Hudson Communications Incorporated	1330	0	2	5	0	B
10	KFFN	AM	Tucson	AZ	Journal Communications Inc	1490	0	1	1	0	C
10	KMXZ	FM	Tucson	AZ	Journal Communications Inc	0	94.9	100	0	1952	C
10	KQTH	FM	Tucson	AZ	Journal Communications Inc	0	104.1	3	0	328	A
10	KTGV	FM	Oracle	AZ	Journal Communications Inc	0	106.3	0.44	0	4173	C2
11	KSAZ	AM	Marana	AZ	KASA Radio Hogar Inc	580	0	5	0.39	0	B
12	KGvy	AM	Green Valley	AZ	KGvy LLC	1080	0	1	0	0	D
13	KWCX	FM	Tanque Verde	AZ	KZLZ LLC	0	104.9	3	0	-230	A
13	KZLZ	FM	Casas Adobes	AZ	KZLZ LLC	0	105.3	0.58	0	1906	C3
14	KCMT	FM	Green Valley	AZ	Lotus Communications Corp	0	92.1	50	0	492	C2
14	KFMA	FM	Oro Valley	AZ	Lotus Communications Corp	0	102.1	100	0	266	C1
14	KLPX	FM	Tucson	AZ	Lotus Communications Corp	0	96.1	100	0	1952	C
14	KTKT	AM	Tucson	AZ	Lotus Communications Corp	990	0	10	0.49	0	B
15	KEVT	AM	Sahuarita	AZ	One Mart Corp	1210	0	10	1	0	B
16	KOHN	FM	Sells	AZ	Tohono O'odham Nation	0	91.9	10	0	1657	C1
17	KUAT	FM	Tucson	AZ	University of Arizona Board of Regents	0	90.5	12	0	3652	C
17	KUAZ	AM	Tucson	AZ	University of Arizona Board of Regents	1550	0	50	0	0	D
17	KUAZ	FM	Tucson	AZ	University of Arizona Board of Regents	0	89.1	1.6	0	614	A

Tucson, Arizona TV Voices

Voices	Call Signs	Channel	DTV Channel	Lic. City of License	Lic. County	Lic. State of License	Parent	Lic. Power	Lic. HAAT	Type Service
1	KFTU-DT	3	36	Douglas	Cochise	AZ	Broadcasting Media Partners Inc	100	30	MAIN
1	KUVE-DT	46	46	Green Valley	Pima	AZ	Broadcasting Media Partners Inc	1679	3593	MAIN
2	KHRR	40	40	Tucson	Pima	AZ	Comcast/NBC	1550	2031	MAIN
3	KVOA	4	23	Tucson	Pima	AZ	Evening Post Publishing Co	35	3583	MAIN
N/A	KGUN-TV	9	9	Tucson	Pima	AZ	Journal Communications Inc	110	3740	MAIN
N/A	KWBA-TV	58	44	Sierra Vista	Cochise	AZ	Journal Communications Inc	5000	1099	MAIN
4	KOLD-TV	13	32	Tucson	Pima	AZ	Raycom Media Incorporated	302	2041	MAIN
5	KMSB	11	25	Tucson	Pima	AZ	Sander Media LLC	316	1663	MAIN
6	KTTU-TV	18	19	Tucson	Pima	AZ	Tucker Broadcasting	2510	1969	MAIN
N/A	KUAS-TV	27	28	Tucson	Pima	AZ	University of Arizona Board of Regents	30.2	584	PUB
N/A	KUAT-TV	6	30	Tucson	Pima	AZ	University of Arizona Board of Regents	33.9	3612	PUB

6 Independent TV Voices

Omaha, NE Radio-Television Cross-Ownership Showing

Journal owns five radio stations – KEZO(FM), KKCD(FM), KQCH(FM), KSRZ(FM), and KXSP(AM) – and one television station – KMTV(TV) – in the Omaha-Council Bluffs, NE-IA market. All of the radio stations are licensed to Omaha, as is KMTV.

The radio-television cross-ownership rule is triggered because the noise limited service contour (“NLSC”) of station KMTV encompasses Omaha.¹¹

Once the radio-television cross-ownership rule is triggered by contour encompassment, the Commission determines compliance with the rule on a Nielsen Audio Metro basis. All of the stations are located in the Omaha Metro.

Section 73.3555(c)(2)(i)(B) of the Commission’s rules provides that in a market where at least 20 independent voices will remain following the proposed combination, an entity may hold attributable interests in one television station and seven radio stations (to the extent permitted under the local radio ownership rule) in a market. As shown on the attached chart, following the consummation of the proposed transfer of control there will be at least 21 independent voices (15 independent radio voices, 5 independent TV voices and one independent newspaper voice). Therefore, the 20 voice test is satisfied, and the ownership by Scripps of one television station and five radio stations is permitted under the radio-television cross-ownership rule.

¹¹ Although Section 73.3555 (c) of the Commission’s rules references the Grade A contour of a television station, the Commission has determined that the digital NLSC may be used in lieu of the former analog Grade A contour in analyzing the applicability of the radio-television cross ownership rule. *See Application for Transfer of Control of Nassau Broadcasting II, LLC*, 25 FCC Rcd 1851(MB 2010); *New Rushmore Radio, Inc.*, 29 FCC Rcd 3265, 3266 n.6 (MB 2014).

Omaha, Nebraska Radio Voices

Voices	Call Signs	AM, FM or FX	Market Name	City of License	State of License	Parent	AM Frequency	FM Frequency	Power-Day/FM	Power-Night	HAAT	Class
1	KYFG	FM	Omaha-Council Bluffs, NE-IA	Omaha	NE	Bible Broadcasting Network Inc		88.9	1.5	0	482	A
2	KZLW	FM	Omaha-Council Bluffs, NE-IA	Gretna	NE	Calvary Chapel Of Omaha		90.1	100	0	69	C1
3	KFAB	AM	Omaha-Council Bluffs, NE-IA	Omaha	NE	CC Media Holdings Inc	1110	0	50	50	0	A
3	KFFF	FM	Omaha-Council Bluffs, NE-IA	Bennington	NE	CC Media Holdings Inc		93.3	8.5	0	558	C3
3	KGOR	FM	Omaha-Council Bluffs, NE-IA	Omaha	NE	CC Media Holdings Inc		99.9	115	0	1214	C0
3	KISO	FM	Omaha-Council Bluffs, NE-IA	Omaha	NE	CC Media Holdings Inc		96.1	82	0	1086	C0
3	KXKT	FM	Omaha-Council Bluffs, NE-IA	Glenwood	IA	CC Media Holdings Inc		103.7	100	0	1086	C0
4	KOMJ	AM	Omaha-Council Bluffs, NE-IA	Omaha	NE	Cochise Broadcasting LLC	1490	0	1	1	0	C
5	KBBX	FM	Omaha-Council Bluffs, NE-IA	Nebraska City	NE	Connoisseur Media LLC		97.7	100	0	978	C1
6	KIOS	FM	Omaha-Council Bluffs, NE-IA	Omaha	NE	Douglas County School District 001		91.5	55	0	554	C1
7	KMLV	FM	Omaha-Council Bluffs, NE-IA	Ralston	NE	Educational Media Foundation		88.1	59	0	1280	C0
8	KIWR	FM	Omaha-Council Bluffs, NE-IA	Council Bluffs	IA	Iowa Western Community College		89.7	100	0	1070	C
9	KEZO	FM	Omaha-Council Bluffs, NE-IA	Omaha	NE	Journal Communications Inc		92.3	100	0	1184	C0
9	KKCD	FM	Omaha-Council Bluffs, NE-IA	Omaha	NE	Journal Communications Inc		105.9	50	0	479	C2
9	KQCH	FM	Omaha-Council Bluffs, NE-IA	Omaha	NE	Journal Communications Inc		94.1	100	0	1184	C
9	KSRZ	FM	Omaha-Council Bluffs, NE-IA	Omaha	NE	Journal Communications Inc		104.5	100	0	1088	C0
9	KXSP	AM	Omaha-Council Bluffs, NE-IA	Omaha	NE	Journal Communications Inc	590	0	5	5	0	B
10	KMMQ	AM	Omaha-Council Bluffs, NE-IA	Plattsmouth	NE	NRG Media LLC	1020	0	50	1.4	0	B
10	KOIL	AM	Omaha-Council Bluffs, NE-IA	Omaha	NE	NRG Media LLC	1290	0	5	5	0	B
10	KOOO	FM	Omaha-Council Bluffs, NE-IA	La Vista	NE	NRG Media LLC		101.9	100	0	1198	C0
10	KOPW	FM	Omaha-Council Bluffs, NE-IA	Plattsmouth	NE	NRG Media LLC		106.9	25	0	328	C3
10	KOZN	AM	Omaha-Council Bluffs, NE-IA	Bellevue	NE	NRG Media LLC	1620	0	10	1	0	B
10	KQKQ	FM	Omaha-Council Bluffs, NE-IA	Council Bluffs	IA	NRG Media LLC		98.5	100	0	1102	C
10	KZOT	AM	Omaha-Council Bluffs, NE-IA	Bellevue	NE	NRG Media LLC	1180	0	25	1	0	B
11	KCRO	AM	Omaha-Council Bluffs, NE-IA	Omaha	NE	Salem Communications Corporation	660	0	1	0.054	0	D
11	KGBI	FM	Omaha-Council Bluffs, NE-IA	Omaha	NE	Salem Communications Corporation		100.7	100	0	1014	C0
11	KOTK	AM	Omaha-Council Bluffs, NE-IA	Omaha	NE	Salem Communications Corporation	1420	0	1	0.33	0	B
12	KVNO	FM	Omaha-Council Bluffs, NE-IA	Omaha	NE	University of Nebraska		90.7	8.9	0	646	C2
13	KVSS	FM	Omaha-Council Bluffs, NE-IA	Papillion	NE	VSS Catholic Communications Inc		102.7	46.1	0	1343	C1
14	KBLR	FM	Omaha-Council Bluffs, NE-IA	Blair	NE	Walnut Radio LLC		97.3	25	0	302	C3
15	KLNG	AM	Omaha-Council Bluffs, NE-IA	Council Bluffs	IA	Wilkins Communications Network Inc	1560	0	10	0	0	D

15 Independent Radio Voices

Omaha, Nebraska TV Voices

Voices	CALLS	Channel	DTV Channel	City of License	County	State of License	Parent	Lic. Power	Lic. HAAT	Type Service
1	WOWT-TV	6	22	Omaha	Sarpy	NE	Gray Television Inc	100	1371	MAIN
2	KETV	7	20	Omaha	Sarpy	NE	Hearst Corporation, The	316	1373	MAIN
3	KBIN-TV	32	33	Council Bluffs	Pottawattamie	IA	Iowa Public Broadcasting Board	575	322	PUB
3	KHIN	36	35	Red Oak	Montgomery	IA	Iowa Public Broadcasting Board	2040	1558	PUB
N/A	KMTV-TV	3	45	Omaha	Sarpy	NE	Journal Communications Inc	100	1371	MAIN
4	KYNE-TV	26	17	Omaha	Sarpy	NE	Nebraska Educational Telecomm Commission	525	427	PUB
5	KPTM	42	43	Omaha	Sarpy	NE	Sinclair Broadcast Group Inc	4800	1558	MAIN
5	KXVO	15	38	Omaha	Sarpy	NE	Sinclair Broadcast Group Inc	5000	1486	MAIN

5 Independent TV Voices

Omaha, Nebraska Newspaper Voice

Voice	Newspaper	County of Publication	Owner	Daily Circulation	DMA TV Population (Sept. 2013)	Percentage of DMA Population
1	Omaha World-Herald	Douglas County, NE	Berkshire Hathaway Inc.	125,470	421,960	29.74%

1 Independent Newspaper Voice

Boise, ID Radio-Television Cross-Ownership Showing

Journal owns four radio stations – KJOT(FM), KQXR(FM), KRVB(FM) and KTHI(FM) – and two television stations – KIVI-TV and KNIN-TV – in the Boise, ID market. The radio stations are licensed to Boise, Payette, Nampa and Caldwell, respectively. The two television stations are licensed to Nampa and Caldwell. As discussed in Section VI.D.1 of the Comprehensive Exhibit, however, Journal will divest one of the two television stations prior to completion of the transaction. Therefore, this attachment analyzes a one TV/four radio combination.

The radio-television cross-ownership rule is triggered because the noise limited service contours (“NLSC”) of KIVI-TV and KNIN-TV encompass the communities of license of each of the radio stations.¹²

Once the radio-television cross-ownership rule is triggered by contour encompassment, the Commission determines compliance with the rule on a Nielsen Audio Metro basis. All of Journal’s radio and television stations are located in the Boise, ID Nielsen Audio Metro, except KQXR(FM), Payette, which is located outside of the Metro. Nevertheless, for purposes of this application only, the applicants are treating all stations as located in the Boise Metro.

Section 73.3555(c)(2)(ii) of the Commission’s rules provides that in a market where at least 10 independent voices will remain following the proposed combination an entity may hold attributable interests in two television stations (to the extent permitted under the local television ownership rule) and four radio stations (to the extent permitted under the local radio ownership rule) in a market. As shown on the attached chart, following the consummation of the proposed transfer of control there will be at least 21 independent voices (16 independent radio voices, 4 independent TV voices and one independent newspaper voice). Therefore, the 10 voice test is satisfied, and the ownership by Scripps of one television station and four radio stations is permitted under the radio-television cross-ownership rule.

¹² Although Section 73.3555 (c) of the Commission’s rules references the Grade A contour of a television station, the Commission has determined that the digital NLSC may be used in lieu of the former analog Grade A contour in analyzing the applicability of the radio-television cross ownership rule. *See Application for Transfer of Control of Nassau Broadcasting II, LLC*, 25 FCC Rcd 1851(MB 2010); *New Rushmore Radio, Inc.*, 29 FCC Rcd 3265, 3266 n.6 (MB 2014).

Boise, Idaho Radio Voices

Voices	CALLS	AM, FM or FX	City of License	State of License	Parent	AM Frequency	FM Frequency	Power-Day/FM	Power-Night	HAAT	Class
1	KRBX	FM	Caldwell	ID	Boise Community Radio Project Inc	0	89.9	7.9	0	935	C2
2	KTRP	AM	Notus	ID	Centro Familiar Cristiano	1450	0	1	1	0	C
3	KBOI	AM	Boise	ID	Cumulus Media Inc	670	0	50	50	0	B
3	KIZN	FM	Boise	ID	Cumulus Media Inc	0	92.3	48	0	2717	C
3	KKGL	FM	Nampa	ID	Cumulus Media Inc	0	96.9	48	0	2717	C
3	KQFC	FM	Boise	ID	Cumulus Media Inc	0	97.9	48	0	2717	C
3	KTIK	FM	New Plymouth	ID	Cumulus Media Inc	0	93.1	48	0	2717	C
3	KTIK	AM	Nampa	ID	Cumulus Media Inc	1350	0	5	0.6	0	B
4	KARJ	FM	Kuna	ID	Educational Media Foundation	0	88.3	23	0	2162	C0
4	KARO	FM	Nyssa	OR	Educational Media Foundation	0	98.7	11.5	0	2635	C0
5	KMHR	AM	Boise	ID	First Western Inc	950	0	3.5	0.035	0	D
6	KNFL	AM	Boise	ID	FM Idaho Co LLC	730	0	15	0.5	0	B
6	KQBL	FM	Mountain Home	ID	FM Idaho Co LLC	0	100.7	70	0	2333	C
6	KSRV	FM	Ontario	OR	FM Idaho Co LLC	0	96.1	49	0	2674	C
6	KWYD	FM	Parma	ID	FM Idaho Co LLC	0	101.1	100	0	1480	C
6	KZMG	FM	Melba	ID	FM Idaho Co LLC	0	102.7	50	0	2635	C
7	KOAY	FM	Middleton	ID	Idaho Conference of Seventh-Day Adventists Inc	0	88.7	6	0	2595	C1
7	KTSY	FM	Caldwell	ID	Idaho Conference of Seventh-Day Adventists Inc	0	89.5	8.3	0	2595	C1
8	KBSU	FM	Boise	ID	Idaho State Board of Education	0	90.3	17.5	0	2713	C
8	KBSX	FM	Boise	ID	Idaho State Board of Education	0	91.5	3.8	0	2713	C1
9	KYVN	AM	Meridian	ID	Impacto Network Inc	890	0	50	0.125	0	D
10	KJOT	FM	Boise	ID	Journal Communications Inc	0	105.1	53	0	2589	C
10	KQXR	FM	Payette	ID	Journal Communications Inc	0	100.3	100	0	709	C1
10	KRVB	FM	Nampa	ID	Journal Communications Inc	0	94.9	49	0	2694	C
10	KTHI	FM	Caldwell	ID	Journal Communications Inc	0	107.1	52	0	2579	C
11	KBXL	FM	Caldwell	ID	KSPD Inc	0	94.1	40	0	2635	C
11	KSPD	AM	Boise	ID	KSPD Inc	790	0	1	0.061	0	D
11	KDZY	FM	McCall	ID	KSPD Inc	0	98.3	0.5	0	1923	C3
12	KDBI	FM	Emmett	ID	NAP Broadcast Holdings LLC	0	101.9	57	0	2533	C
12	KQTA	FM	Homedale	ID	NAP Broadcast Holdings LLC	0	106.3	100	0	1028	C
13	KCID	AM	Caldwell	ID	Salt & Light Radio Inc	1490	0	1	1	0	C
13	KGEM	AM	Boise	ID	Salt & Light Radio Inc	1140	0	10	10	0	B
14	KAWO	FM	Boise	ID	Townsquare Media LLC	0	104.3	52	0	2579	C
14	KCIX	FM	Garden City	ID	Townsquare Media LLC	0	105.9	49	0	2700	C
14	KFXD	AM	Boise	ID	Townsquare Media LLC	630	0	5	5	0	B
14	KIDO	AM	Nampa	ID	Townsquare Media LLC	580	0	5	5	0	B
14	KSAS	FM	Caldwell	ID	Townsquare Media LLC	0	103.5	54	0	2579	C
14	KXLT	FM	Eagle	ID	Townsquare Media LLC	0	107.9	45	0	2684	C
15	KKOO	FM	Fruitland	ID	Treasure Valley Broadcasting	0	99.5	22	0	2635	C0
16	KBGN	AM	Caldwell	ID	Wilson, Nelson & Karen	1060	0	10	0	0	D

16 Independent Radio Voices

Boise, Idaho TV Voices

Voices	CALLS	Channel	DTV Channel	City of License	County	State of License	Parent	Power	HAAT	Type Service
1	KTRV-TV	12	13	Nampa	Canyon	ID	Block Communications Inc	178	2720	MAIN
2	KTVB	7	7	Boise	Ada	ID	Gannett Company Inc	195	2651	MAIN
3	KKJB	39	39	Boise	Ada	ID	IAM Broadcasting LLC	1295	1752	MAIN
N/A	KAID	4	21	Boise	Elmore	ID	Idaho State Board of Education	57.5	2474	PUB
N/A	KIVI-TV	6	24	Nampa	Canyon	ID	Journal Communications Inc	56	2811	MAIN
N/A	KNIN-TV	9	10	Caldwell	Canyon	ID	Journal Communications Inc	162	2690	MAIN
4	KBOI-TV	2	9	Boise	Ada	ID	Sinclair Broadcast Group Inc	64.6	2549	MAIN

4 Independent TV Voices

Boise, Idaho Newspaper Voice

Voice	Newspaper	County of Publication	Owner	Daily Circulation	DMA TV Population (Sept. 2013)	Percentage of DMA Population
1	The Idaho Statesman	Ada County, ID	The McClatchy Company	47,855	267,470	17.89%

1 Independent Newspaper Voice

Green Bay Radio-Television Cross-Ownership Showing

Journal owns two television stations that are part of the Green Bay-Appleton, WI DMA – WGBA-TV, Green Bay, and WACY-TV, Appleton. Journal does not own any radio stations located in the Green Bay DMA. However, Journal's WTMJ(AM), Milwaukee, has a 2 mV/m daytime contour that encompasses both Green Bay and Appleton. Therefore, the radio-television cross-ownership rule is triggered.

Once the radio-television cross-ownership rule is triggered by contour encompassment, the Commission determines compliance with the rule on a Nielsen Audio Metro basis. WACY-TV is located in the Appleton-Oshkosh Nielsen Audio Metro, and WGBA-TV is located in the adjacent Green Bay Nielsen Audio Metro.

The FCC's radio-television cross-ownership rule permits the ownership of one radio and two television stations in the same market, regardless of the number of independent voices remaining in the market. Following the proposed transfer of control, Scripps will own one television station and one radio station in the Appleton-Oshkosh Metro and one television station and one radio station in the Green Bay Nielsen Audio Metro. The combination therefore complies with the radio-television cross-ownership rule. *See also Ace TV, Inc.*, 27 FCC Rcd 10864 at n.2 (finding that combination complied with the radio-television cross-ownership rule).