

Multiple Ownership Study

The proposed transaction involves the assignment of Station KBSI(TV), Cape Girardeau, Missouri, and Station WDKA(TV), Paducah, Kentucky (the “Stations”), from subsidiaries of Sinclair Television Group, Inc., to Paducah Television License LLC. The Stations are licensed to communities assigned to the Paducah-Cape Girardeau-Harrisburg-Mt. Vernon Designated Market Area (the “DMA”).

Pursuant to Section 73.3555(b) of the FCC’s Rules, an entity may directly or indirectly own, operate, or control two television stations licensed in the same DMA if:

(1) The digital noise limited service contours of the stations (computed in accordance with §73.622(e)) do not overlap; or

(i) At the time the application to acquire or construct 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 a.m.-midnight) audience share, as measured by Nielsen Media Research or by any comparable professional, accepted audience ratings service;

and

(ii) At least 8 independently owned and operating, full-power commercial and noncommercial TV stations would remain post-merger in the DMA in which the communities of license of the TV stations in question are located.

The Stations’ digital noise limited service contours overlap. As such, the continued common ownership of the Stations by the proposed assignee is permissible if it can be demonstrated that one of the two Stations is not ranked among the top four stations in the DMA, and that there will remain at least 8 independently owned and operating full-power commercial and noncommercial TV stations in the DMA.

Station WDKA(TV) is a My Network affiliated station, and does not rank in the top four stations in the DMA. As demonstrated below, the continued common ownership of the Stations by the proposed assignee will result in the DMA continuing to have at least 8 independently owned and operating full-power commercial and noncommercial TV stations after the proposed transaction is consummated.

Based on this showing, the proposed transaction complies with Section 73.3555(b) of the FCC’s Rules.

Paducah-Cape Girardeau-Harrisburg-Mt Vernon DMA (Ranked #84)
POST CONSUMMATION
Television Voices Chart

	Call Sign	FAC ID	Net	Community of License	Licensee
1.	KPOB-TV	73998	ABC	Poplar Bluff, Missouri	WSIL-TV, Inc.
	WSIL-TV	73999	ABC	Harrisburg, Illinois	WSIL-TV, Inc.
2.	WDKA*	39561	MYTV	Paducah, Kentucky	WDKA Licensee, LLC (Parent: Sinclair Television Group, Inc.)
	KBSI*	19593	FOX	Cape Girardeau, Missouri	KBSI Licensee, L.P. (Parent: Sinclair Television Group, Inc.)
3.	WPSD-TV	51991	NBC	Paducah, Kentucky	WPSD-TV, LLC
4.	KFVS-TV	592	CBS	Cape Girardeau, Illinois	Gray Television Licensee, LLC
5.	WKMU	34174	PBS	Murray, Kentucky	Kentucky Authority for Educational TV
	WKPD	65758	PBS	Paducah, Kentucky	Kentucky Authority for Educational TV
6.	WSIU-TV	4297	PBS	Carbondale, Illinois	Southern Illinois University
7.	WTCT	67786	REL	Marion, Illinois	Radiant Life Ministries, Inc.
8.	WPXS ¹	40861	IND	Mount Vernon, Illinois	WPXS, Inc.

* Stations subject to the proposed transaction.

¹ The post-merger 8-voice minimum threshold is based on independently owned television stations remaining “in the DMA in which the communities of license of the TV stations in question are located.” See 47 C.F.R. 73.3555(b)(1)(ii). The community of license of WPXS(TV) is Mt. Vernon, IL, which is located in Jefferson County, IL, one of the counties located in the Paducah-Cape Girardeau-Harrisburg-Mt. Vernon DMA. While WPXS(TV) is, at the request of the former licensee of WPXS(TV), reported in the Nielsen Market Data Report for the St. Louis, MO DMA, it is actually located in the Paducah-Cape Girardeau-Harrisburg-Mt Vernon DMA. See *Charter Communications Entertainment I, L.P.*, 12 FCC Rcd 12173 (1997). The common ownership of Station KBSI and Station WDKA was approved by the FCC in 2017. See *Broadcast Actions*, Public Notice, June 5, 2017 (Rpt. 48999) (BALCDT - 20160302ADZ).