

Multiple Ownership

The instant application is one in a series of applications seeking the Commission’s consent to the assignment of the licenses of 11 full-power television stations in eight markets, along with associated low-power television and non-broadcast licenses, to subsidiaries of TEGNA Inc. (“TEGNA,” and such assignments, the “Transaction”). The full-power television licenses proposed to be assigned are as follows:

| Station | Market | Assignor | Assignee |
|---------|--|---|----------------------------------|
| WTIC-TV | Hartford-New Haven, CT | Tribune Broadcasting Hartford, LLC | TEGNA Broadcast Holdings, LLC |
| WCCT-TV | | | |
| WPMT | Harrisburg-Lancaster-Lebanon-York, PA | WPMT, LLC | TEGNA Broadcast Holdings, LLC |
| WATN-TV | Memphis, TN | Nexstar Broadcasting, Inc. | TEGNA Memphis Broadcasting, Inc. |
| WLMT | | | |
| WNEP-TV | Wilkes Barre-Scranton, PA | Local TV Pennsylvania License, LLC ¹ | TEGNA Broadcast Holdings, LLC |
| WOI-DT | Des Moines-Ames, IA | Nexstar Broadcasting, Inc. | TEGNA Broadcast Holdings, LLC |
| KCWI-TV | | | |
| WZDX | Huntsville-Decatur-Florence, AL | Nexstar Broadcasting, Inc. | TEGNA Broadcast Holdings, LLC |
| WQAD-TV | Davenport, IA / Rock Island-Moline, IL | WQAD License, LLC | TEGNA Broadcast Holdings, LLC |
| KFSM-TV | Ft. Smith-Fayetteville-Springdale-Rogers, AR | Tribune Broadcasting Fort Smith License, LLC | Cape Publications, Inc. |

The proposed assignments of the above-referenced stations’ licenses to TEGNA comply with the Commission’s local and national television multiple ownership rules.

¹ Station licensed to Local TV Pennsylvania License, LLC (“WNEP Licensee”), a subsidiary of Dreamcatcher Broadcasting, LLC (“Dreamcatcher”), to which subsidiaries of Tribune Media Company currently provide services pursuant to contractual arrangements. Tribune intends to exercise its option to acquire WNEP Licensee from Dreamcatcher and, under the terms of the option, direct Dreamcatcher to assign the station’s licenses and related assets to the proposed TEGNA assignee as part of the consummation of the Transaction, to occur concurrently with consummation of the Nexstar-Tribune transaction. Appropriate applications seeking Commission consent to the assignment of WNEP’s licenses will be filed shortly.

With respect to the Commission's 39 percent cap on national television audience reach,² Attachment 1 attached hereto shows that, with the proposed assignments, TEGNA's national audience reach would be about 30.35 percent as calculated under the Commission's existing rules and 37.14 percent without including the UHF discount in the calculation. Both figures are below the 39 percent cap.

With respect to the Commission's local television multiple ownership rule,³ TEGNA holds no existing attributable interests in any television stations in any of the above-referenced markets. Thus, in the five markets where TEGNA proposes to acquire only one station, the local television multiple ownership rule is not implicated. In the three markets where TEGNA proposes to acquire two in-market stations – Hartford, Memphis, and Des Moines – these station combinations are permissible because at least one station in each market is ranked below the top four stations in the market, based on the most recent all-day audience share measured by professional, accepted audience ratings services.⁴ Specifically:

- In Hartford, Nielsen's February 2019 survey shows that WCCT-TV placed fifth in all-day household share by a significant margin.
- In Memphis, Comscore's February 2019 survey shows that WATN consistently placed fifth in all-day household share, except on Saturday, when WATN placed fourth by a narrow margin over WLMT.
- In Des Moines, Comscore's February 2019 survey shows that KCWI consistently placed fifth in all-day household share by a significant margin.

Accordingly, grant of the instant license assignment applications would comply with the Commission's national and local television multiple ownership rules.

² 47 C.F.R. § 73.3555(e).

³ 47 C.F.R. § 73.3555(b).

⁴ § 73.3555(b)(1)(ii). Ratings data for the Hartford, Memphis and Des Moines markets are provided in Attachment 2, which is being filed with the relevant applications under a request for confidential treatment pursuant to Section 0.459 of the Commission's rules. 47 C.F.R. § 0.459.

Attachment 1

TEGNA National Television Audience Reach

TEGNA Post-Transaction National Audience Reach


| DMA NAME | CALL LETTERS (BAND) | TV HOMES | % OF US* |
|---------------------------------------|------------------------|-----------|----------|
| Dallas | WFAA (VHF) | 2,622,070 | 2.38% |
| Washington, DC | WUSA (VHF) | 2,482,480 | 2.25% |
| Houston | KHOU (VHF) | 2,423,360 | 2.20% |
| Atlanta | WXIA (VHF) | 2,341,390 | 2.12% |
| | WATL (VHF) | | |
| Tampa | WTSP (VHF) | 1,875,420 | 1.70% |
| Phoenix | KPNX (VHF) | 1,864,420 | 1.69% |
| | KNAZ (VHF) | | |
| Seattle | KING (UHF) | 1,854,810 | 1.68% |
| | KONG (UHF) | | |
| Minneapolis | KARE (VHF) | 1,713,310 | 1.55% |
| Denver | KUSA (VHF) | 1,585,270 | 1.44% |
| | KTVD (VHF) | | |
| Cleveland | WKYC (UHF) | 1,399,470 | 1.27% |
| Sacramento | KXTV (VHF) | 1,357,690 | 1.23% |
| St. Louis | KSDK (UHF) | 1,164,400 | 1.06% |
| Portland, OR | KGW (VHF) | 1,141,770 | 1.04% |
| Charlotte | WCNC (UHF) | 1,129,900 | 1.02% |
| San Diego | KFMB (VHF) | 987,760 | 0.90% |
| San Antonio | KENS (UHF) | 923,990 | 0.84% |
| Hartford-New Haven, CT | WTIC (UHF) | 897,870 | 0.81% |
| | WCCT (UHF) | | |
| Austin | KVUE (UHF) | 751,650 | 0.68% |
| Harrisburg-Lancaster-Lebanon-York, PA | WPMT (UHF) | 705,190 | 0.64% |
| Jacksonville | WTLV (VHF) | 681,330 | 0.62% |
| | WJXX (VHF) | | |
| Norfolk | WVEC (VHF) | 678,210 | 0.62% |
| Greensboro | WFMY (UHF) | 675,130 | 0.61% |
| Louisville | WHAS (VHF) | 647,190 | 0.59% |
| Grand Rapids | WZZM (VHF) | 639,410 | 0.58% |
| New Orleans | WWL (UHF) | 624,020 | 0.57% |
| | WUPL (UHF) | | |
| Memphis, TN | WLMT (UHF) | 623,390 | 0.57% |
| | WATN (UHF) | | |
| Buffalo | WGRZ (UHF) | 586,930 | 0.53% |

* DMA percentages rounded to two decimal places. Total reach calculated based on aggregate households.

Assignment Application
FCC Form 314
Exhibit 18, Attachment 1

| DMA NAME | CALL LETTERS (BAND) | TV HOMES | % OF US* |
|--|--------------------------|--------------------|-----------------|
| Little Rock | KTHV (VHF) | 527,090 | 0.48% |
| Knoxville | WBIR (VHF) | 512,160 | 0.46% |
| Wilkes Barre-Scranton, PA | WNEP (UHF) | 481,390 | 0.44% |
| Toledo | WTOL (VHF) | 401,510 | 0.36% |
| Tucson | KMSB (UHF) | 392,920 | 0.36% |
| Columbia, SC | WLTX (UHF) | 389,590 | 0.35% |
| Des Moines-Ames, IA | WOI (UHF) KCWI (UHF) | 383,590 | 0.35% |
| Spokane | KREM (UHF) KSKN (UHF) | 382,690 | |
| Huntsville-Decatur-Florence, AL | WZDX (UHF) | 372,770 | 0.34% |
| Portland, ME | WCSH (UHF) | 339,980 | 0.31% |
| Waco | KCEN (VHF) | 322,820 | 0.29% |
| Davenport, IA-Rock Island-Moline, IL | WQAD (UHF) | 280,420 | 0.25% |
| Boise | KTVB (VHF) | 273,500 | 0.25% |
| Ft. Smith-Fayetteville-Springdale-Rogers, AR | KFSM (UHF) | 272,240 | 0.25% |
| Tyler | KYTX (UHF) | 232,180 | 0.21% |
| Macon | WMAZ (VHF) | 224,180 | 0.20% |
| Corpus Christi | KIII (VHF) | 193,070 | 0.18% |
| Beaumont | KBMT (VHF) | 152,710 | 0.14% |
| Odessa-Midland | KWES (VHF) | 150,430 | 0.14% |
| Bangor | WLBZ (VHF) | 124,190 | 0.11% |
| Abilene | KXVA (UHF) | 104,440 | 0.09% |
| San Angelo | KIDY (VHF) | 52,790 | 0.05% |
| TEGNA TOTAL | Discounted | 33,460,010 | 30.351% |
| (Post-Transaction) | Undiscounted | 40,944,490 | 37.140% |
| TOTAL US HOUSEHOLDS | | 110,244,650 | 100.000% |

Source: The Nielsen Company (US), LLC, Local Television Market Universe Estimates (Sept. 22, 2018)

 = Proposed assignment

Attachment 2

Audience Share Data

**CONFIDENTIAL TREATMENT REQUESTED
PURSUANT TO 47 C.F.R. § 0.459**