

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)	383,590	0.35%
	KCWI (UHF)		
Spokane	KREM (UHF)	382,690	
	KSKN (UHF)		
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**