

Exhibit 15
Multiple Ownership Compliance
Request for Continued Satellite Authorization

The instant application (the “Application”) seeks Commission consent to the assignment of the license of television station WOLF-TV, Hazelton, Pennsylvania, from WOLF License Corp. to New Age Media of Pennsylvania License, LLC (the “Assignee”). WOLF-TV is commonly owned with WQMY(TV), Williamsport, Pennsylvania, for which a separate application has been simultaneously filed that requests Commission consent to the assignment of the license of WQMY(TV) from Pegasus Broadcast Associates, L.P. to Assignee. Both WOLF-TV and WQMY(TV) are located in the Wilkes Barre-Scranton, Pennsylvania DMA. WQMY(TV) is a satellite station to WOLF-TV.

Continued authorization of satellite operations for WQMY(TV) is requested and justified pursuant to the three-prong test set forth in *Television Satellite Stations*, 6 FCC Rcd 4212, 4213-14 (1991). Under that test, an applicant requesting continued satellite status is entitled to a presumption that the proposed satellite operation serves the public interest if it satisfies the following three criteria: (1) there is no City Grade contour overlap between the parent and the satellite; (2) the proposed satellite would provide service to an unserved or underserved area; and (3) no alternative operator is ready and able to construct or to purchase and operate the satellite as a full-service station. *Id.* As demonstrated below, the Assignee respectfully submits that each of the criteria set forth in *Television Satellite Stations* is satisfied:

1. No City-Grade Contour Overlap. As demonstrated in the Technical Exhibit prepared by du Treil, Lundin & Rackley, Inc. (attached hereto as Exhibit A),

there is no overlap of the City Grade contours of WQMY(TV) and WOLF-TV.

Therefore, Assignee satisfies the first criterion.

2. Service to an Underserved Area. Service of an underserved area can be shown using the "transmission test," whereby the satellite station's community of license is considered underserved if there exists two or fewer full-service television stations already licensed to that community. As the Commission's records reflect, WQMY(TV) is the only full-service television station licensed to Williamsport, Pennsylvania, which renders Williamsport underserved using the transmission test. Therefore, Assignee satisfies the second criterion.

3. No Alternative Operator Proposing Full-Service Operation. The third criterion is that no alternative operator exists that is ready and able to purchase and operate the satellite as a full-service, stand-alone station. A statement from Brian E. Cobb, President of CobbCorp, a recognized media brokerage and merchant banking firm, is attached hereto as Exhibit B. The statement notes that Mr. Cobb has over 40 years experience in the broadcast industry, and in nearly two decades has been involved in the brokerage of more television stations than any other broker. In his statement, Mr. Cobb concludes that WQMY(TV) would not be financially viable as a stand alone station. Therefore, as demonstrated in Exhibit B, Assignee satisfies the third criterion.

For the reasons stated herein, Assignee respectfully submits that it has satisfied each of the presumptive criteria to support continued authorization of WQMY(TV) as a satellite station of WOLF-TV, and requests that the Commission continue to authorize the operation of WQMY(TV) as a satellite of WOLF-TV.

Exhibit A


TECHNICAL EXHIBIT
REQUEST FOR
CONTINUATION OF SATELLITE OPERATION
WQMY(TV)

Technical Narrative

The technical exhibit of which this narrative is a part was prepared on behalf of New Age Media of Pennsylvania License, LLC, and concerns the acquisition of TV stations WQMY, Ch. 53, at Williamsport, Pennsylvania and WOLF(TV), Ch. 56 at Hazleton, Pennsylvania, and the continued satellite operation of station WQMY. Currently, TV station WQMY is authorized to operate as a satellite station of TV station WOLF(TV) on channel 56 at Hazleton, Pennsylvania. This technical exhibit has been prepared to support the continued satellite operation of WQMY based on the presumption that the operation will continue to be in the public interest.

TV station WQMY is licensed (BLCT-19990203KE) to operate on channel 53 with a maximum directional effective radiated power (ERP) of 1320 kilowatts and an antenna radiation center height (HAAT) of 244 meters. In addition, TV station WOLF-TV (BLCT-19981202KG) is licensed to operate on channel 56 with a maximum directional ERP of 1580 kilowatts and an HAAT of 503 meters. The transmitter sites of these stations are located 105 kilometers apart. Figure 1 is a map showing the FCC Predicted 80 dBu F(50,50) City Grade contours for the two TV stations. As shown on Figure 1, there is no overlap of the City Grade contours.

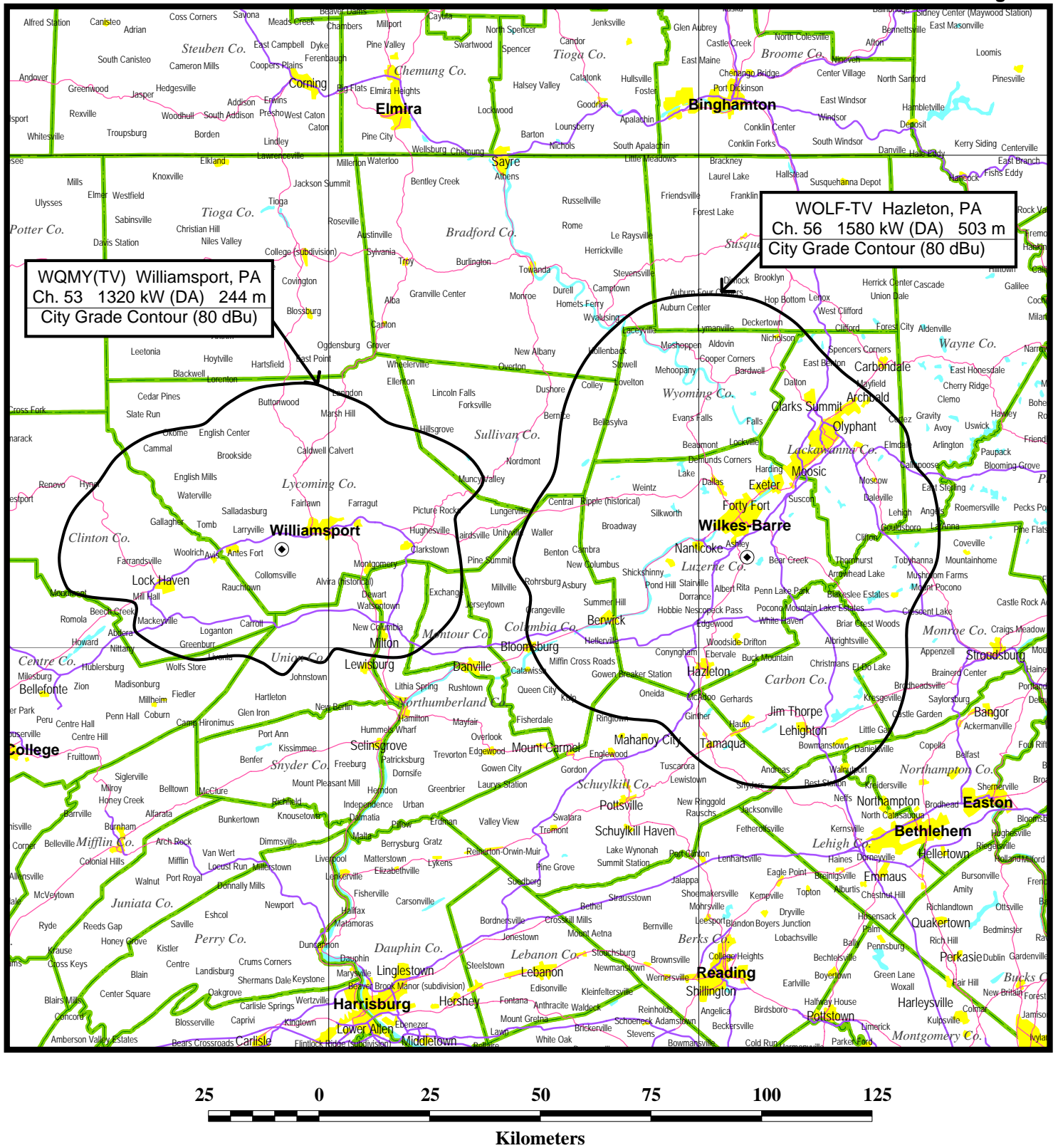
Based on the fact that WQMY is currently authorized to operate as a satellite operation of WOLF-TV, and that the licensed City Grade contours of the two stations do not overlap, it is believed it is in the public interest for WQMY to continue to operate as a satellite station of WOLF-TV after the acquisition.



Jerome J. Manarchuck

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August 24, 2006

Figure 1



FCC PREDICTED CITY GRADE COVERAGE CONTOURS

TV STATIONS WQMY(TV) & WOLF-TV
WILLIAMSPORT & HAZLETON, PA
CHS 53 & 56

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Exhibit B

August 28, 2006

Mr. Clay C. Pendarvis
Associate Division Chief, Video Division
Federal Communications Commission
Room 2-A662
445 12th Street S.W.
Washington, DC 20554

Re: Application for continuation of satellite status of WQMY-TV licensed to
Williamsport, Pennsylvania

Dear Mr. Pendarvis:

In regard to the transfer and assignment applications filed to transfer the ownership of WOLF-TV, Hazelton, Pennsylvania and WQMY-TV, Williamsport, Pennsylvania, I have been requested to comment on the continued operation of WQMY-TV as a satellite of WOLF. This letter addresses the feasibility of operating and marketing the satellite station as a full service stand alone operation versus continuing to employ WQMY as a satellite of WOLF.

By way of background, I have over forty years of experience in the broadcast industry as an owner, manager and broker of broadcast properties. I am President of CobbCorp, a media brokerage and merchant banking firm specializing in television station transactions. I was a founding partner of Media Venture Partners, a nationally recognized media brokerage firm, and I was responsible for the appraisal and brokerage of television stations for Media Venture Partners. Over the past nineteen years, I have been involved in the brokerage of more television stations than any other broker. I am a past president of the National Association of Media Brokers, in addition to belonging to NAPTE.

Based on my experience and after doing research on the market and the competitive environment, I believe I am qualified to opine on whether WQMY in Williamsport is capable of functioning as a full service independently operated station in the Wilkes Barre-Scranton DMA.

Although the Wilkes Barre-Scranton DMA is ranked fifty-fourth by Nielsen, the estimated television revenue rank is seventy-third according to BIA. WQMY fails to

cover either Wilkes Barre or Scranton, the most populated communities in the market, with a city grade signal. The remainder of the market's population is scattered among several small communities.

The market is composed of six full power commercial competitors. Without satellite status, WQMY would be unable to compete with the other stations. The four major competitors are affiliated with the main networks. WQMY will be broadcasting programming from My Network TV, the new start up network beginning next month. With no established ratings from the new network, WQMY would assuredly lose money having to shoulder the entire overhead of operating a full service facility.

Although WQMY offers independent programming from WOLF, it is my opinion that WQMY would not be financially viable without the ability to limit operating expenses by sharing services and personnel with the parent station. If the owners were forced to sell it, I doubt that there would be a viable purchaser for the station since the prospect that it would be financially successful would be dubious.

While WQMY as a satellite supplies much needed programming to the market's sparsely populated outlying areas, without a big four network affiliation or shared services with WOLF, it could not be expected to continue to offer independent programming. The two stations city grade analog signals do not overlap. WQMY provides free over the air service to outlying communities, which otherwise would be deprived of such service because they could not economically support and sustain a stand alone station.

If the new owners requested that I offer the station for sale on an independent basis, I would be reluctant to do so since I feel that a new owner's prospect for success would be doubtful.

Sincerely,



Brian E. Cobb
President