

EXHIBIT 15
FCC Form 314
Section III, Paragraph 6(b)

Multiple Ownership

ION Media Networks, Inc. (“ION”) will hold a 49% equity interest in Urban, the proposed assignee of the new share-time stations. This application complies with the Commission’s multiple ownership rules¹ because Section 73.3555(b) of the rules permits common ownership of two television stations in the same DMA if, among other circumstances:

[a]t the time the application to acquire . . . 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 (9:00 a.m.-midnight) audience share as measured by Nielsen Media Research . . . and [a]t least 8 independently owned and operating full-power commercial and noncommercial stations would remain post-merger in the DMA in which the communities of license of the TV stations in question are located.

The current Nielsen ratings for each DMA reflect that the ION station is not among the top four stations in each market, and each market includes at least eight independently owned and operating full-power commercial and noncommercial stations.² Moreover, because this transaction proposes to *add* a new voice to each market and does

¹ Because the Commission’s 2003 revisions to its local television ownership rules were stayed by the Third Circuit, the pre-2003 version of Section 73.3555(b) remains in effect and all references are to that version. See Public Notice, *Media Bureau to Terminate Temporary Broadcast Station Application Freeze*, 18 FCC Rcd. 18631 (2003); *Prometheus Radio Project v. FCC*, 373 F.3d 372 (3d Cir. 2004), *cert. denied*, 125 S.Ct. 2902 (2005).

² These conclusions are supported by the attached Declaration of William L. Watson, who attests that none of the stations in markets impacted by this transaction and in which ION holds an attributable interest, are among the top four stations in their respective markets and that there are eight voices in each of these markets.

not propose to subtract a voice, the Commission's policy against *reducing* diversity of programming is not implicated.


The Commission's rules therefore allow ION to hold equity in Urban while continuing to hold attributable interests in its existing licenses in the same markets.

DECLARATION OF WILLIAM L. WATSON

I, William L. Watson, hereby declare:

1. I am employed as Vice President and Assistant General Counsel of ION Media Networks, Inc. ("ION"), the parent of the television station licensees identified in Exhibit 4-A to this application.
2. In my role as Vice President and Assistant General Counsel, one of my responsibilities is to ensure ION's compliance with the rules of the Federal Communications Commission, including its multiple ownership rules.
3. I have reviewed the list of television stations in Exhibit 4-A to this application and have determined that: (a) each of the stations listed in Exhibit 4-A is not ranked in the top four stations by Nielsen Media Research based on the most recent all-day (9:00 a.m.-midnight) audience share; and (b) there are at least eight independently owned and operating full-power commercial and noncommercial stations in each of the Nielsen Designated Market Areas where the stations listed in Exhibit 4-A are located.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 14, 2008.



WILLIAM L. WATSON