

Transferee Exhibit 20
Multiple Ownership

As described in more detail in Exhibit 15A, the instant application and a concurrently-filed companion application seek FCC consent to the transfer of control of the licenses of television stations WUPL, Slidell, Louisiana, and WWL-TV, New Orleans, LA, from the shareholders of Belo Corp. (“Belo”), to Gannett Co., Inc. (“Gannett”) (through the merger of a subsidiary of Gannett into Belo, with Belo as the surviving entity of that merger). Upon consummation of the proposed transaction, this existing duopoly in the New Orleans, LA, Designated Market Area (DMA) will continue to be compliant with the eight-voices/top-four-ranked stations requirements of Section 73.3555(b) of the Commission’s Rules.

Section 73.3555(b) permits common ownership of two television stations within the same DMA where (1) at least eight independently-owned and operating full-power commercial and noncommercial television stations will remain in the DMA in which the communities of license of the stations subject to the transaction are located and (2) at least one of the two commonly owned stations is not among the top-four ranked television stations in the DMA based on audience share. Rankings are based on the most recent all-day audience share at the time the application is filed, as measured by a professional rating service, such as Nielsen Media Research. *See* 47 C.F.R. § 73.3555(b).

Based on audience share data compiled by Nielson Media Research, as of the most recent (May) sweeps audience measurement period, only WWL-TV is ranked among the top-4 stations in the New Orleans, LA DMA. In addition, as shown below, at least eight independently-owned and operating full-power commercial and noncommercial television stations will remain in the New Orleans, LA DMA following consummation of the transaction.

Full-Power, Operational and Independently-Owned
TV Stations Licensed to Communities in the New Orleans, LA DMA
(Sources: Television and Cable Factbook 2013 and FCC CDBS Database)

	Station	Channel	Community of License	Licensee (Owner)
1	WWL-TV (74192)	36 (CBS)	NEW ORLEANS, LA	WWL-TV, INC. (BELO CORP.)
	WUPL (13938)	24 (MNT)	SLIDELL, LA	BELO TV, INC (BELO CORP.)
2	WDSU (71357)	43 (NBC)	NEW ORLEANS, LA	NEW ORLEANS HEARST TELEVISION, INC. (THE HEARST CORPORATION)
3	WVUE (4149)	29 (FOX)	NEW ORLEANS, LA	LOUISIANA MEDIA COMPANY, LLC (THOMAS BENSON, JR.)
4	WYES-TV* (25090)	11 (ETV)	NEW ORLEANS, LA	GREATER NEW ORLEANS EDUCATIONAL TELEVISION FOUNDATION
5	WHNO (37106)	20/14 (IND)	NEW ORLEANS, LA	LESEA BROADCASTING OF NEW ORLEANS, INC. (LESEA BROADCASTING CORPORATION)
6	WGNO (72119)	26 (ABC)	NEW ORLEANS, LA	TRIBUNE TELEVISION NEW ORLEANS, INC. (TRIBUNE BROADCASTING CO.)
	WNOL-TV (54280)	15 (CW)	NEW ORLEANS, LA	TRIBUNE TELEVISION NEW ORLEANS, INC. (TRIBUNE BROADCASTING CO.)
7	WLAE-TV* (18819)	31 (ETV)	NEW ORLEANS, LA	EDUCATIONAL BROADCASTING FOUNDATION, INC. (LOUISIANA EDUCATIONAL TELEVISION AUTHORITY AND WILL WOODS COMMUNITY)
8	KGLA-DT (83945)	42 (TMO)	HAMMOND, LA	MAYAVISION, INC. (ERNESTO SCHWEIKERT, III)
9	WPXL-TV (21729)	50 (IND)	NEW ORLEANS, LA	ION MEDIA NEW ORLEANS LICENSE, INC. (ION MEDIA NETWORKS INC.)

*Education Television Stations