

**Exhibit 17**  
**Multiple Ownership**

As identified in Exhibit 15, certain attributable parties of the Assignee are also attributable parties of the licensee of television station WBXX-TV, Crossville, Tennessee. Both WBXX-TV and WMAK(TV) are located in the Knoxville Designated Market Area (DMA).

The FCC's local ownership rules currently in effect allow an entity, directly or indirectly, to own, operate, or control two television stations licensed in the same DMA under the following conditions:

1. The digital noise limited service contours of the stations do not overlap;<sup>1</sup> or
2. (a) At the time the application to acquire or construct 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 audience share data, and (b) at least eight independently owned and operated, full-power commercial and non-commercial TV stations would remain post-merger in the DMA in which the communities of license of the TV stations in question are located.<sup>2</sup>

The digital noise limited service contours of WMAK(TV) and WBXX-TV overlap. Therefore, common attribution of the stations requires compliance with the top four stations/eight independent voices test described above. For the following reasons, the proposed combination meets these requirements.

As set forth in the following chart,<sup>3</sup> there are currently ten (10) independently owned and operated full-power television voices in the Knoxville DMA:

---

<sup>1</sup> See 47 C.F.R. § 73.3555(b)(1). Rule 73.3555(b)(1) at this time still speaks in terms of overlap in analog Grade B contours, but, post-digital transition, the equivalent of the analog Grade B service contour is the noise limited service contour. See *Borger Broadcasting, Inc., Debtor in Possession Midessa Broadcasting, L.P.*, Letter, 25 FCC Rcd 1204, 1204-05 & n.3 (MB 2010) (citing *Report To Congress: The Satellite Home Viewer Extension And Reauthorization Act of 2004; Study of Digital Television Field Strength Standards and Testing Procedures*, 20 FCC Rcd 19504, 19507, ¶3 (2005)).

<sup>2</sup> See 47 C.F.R. § 73.3555(b)(1)(i)-(ii).

<sup>3</sup> Source: Television & Cable Factbook 2012 (TV Volume); BIA/Kelsey Knoxville, TN Market Overview (Aug. 22, 2012).

<b>Voice</b>	<b>Owner</b>	<b>Call Sign(s)</b>	<b>Affiliation</b>	<b>Average Weekly/Daily Circulation</b>	<b>Rank<sup>4</sup></b>
1	Living Faith Ministries, Inc.	WAGV	Independent	2,516/446	8/9
2	Young Broadcasting, Inc.	WATE-TV	ABC	330,280/154,812	3
3	Gannett Co. Inc.	WBIR-TV	NBC	379,268/217,426	1
4	Assignee	WBXX-TV	CW	99,311/34,542	5
5	Word of God Fellowship	WMAK	Independent	12,565/1,764	7
6	ION Media Networks, Inc.	WPXK-TV	ION	36,299/10,112	6
7	Raycom Media Inc.	WTNZ	FOX	266,100/96,885	4
8	Volunteer Christian Television	WVLR	IND	1,399/466	9/8
9	Gray Television Inc.	WVLT-TV	CBS/MNT	345,902/157,240	2
10	East Tennessee Public Communications Co.	WKOP-TV WETP-TV	Noncommercial Noncommercial	n/a	n/a

After common attribution of WMAK(TV) and WBXX-TV, there will be nine (9) independently owned and operated television voices in the market—more than the required eight (8).

Moreover, neither WMAK(TV) nor WBXX-TV are among the top four ranked stations, in terms of audience share, in the DMA. *See* Affidavit of Marcus D. Lamb (attached as Attachment A); Affidavit of David A. Hanna (attached as Attachment B). Neither station has been among the top four ranked stations in the market under current ownership. *See id.* While the Commission's rules generally require television duopoly applicants to demonstrate that the station rank requirement of the television duopoly rule is met by presenting the most recent all day (9 a.m. to midnight) Nielsen audience share data, *see* 47 C.F.R. § 73.3555(b)(1)(i), the Assignee respectfully requests waiver of the requirement in this case. The Assignor and Assignee are not subscribers to Nielsen, and Nielsen has quoted a six-figure estimated cost to obtain the audience share data contemplated by the rule. Accordingly, under the circumstances where, as here, the proposed combination involves a religious independent station and a CW affiliated station, the Assignee respectfully requests waiver of the requirement to present such Nielsen data in the instant application. The Assignee has access to the average weekly and average daily circulation data listed above through publicly available sources.<sup>5</sup> According to the Television & Cable Factbook 2012, the data are drawn from 2011 Nielsen measurements among cable and non-cable television households in the Knoxville DMA. The Assignee respectfully requests that the Commission accept the available data above and the attached affidavits in

---

<sup>4</sup> Rank is based on the average weekly circulation and average daily circulation data presented herein.

<sup>5</sup> Source: Television & Cable Factbook 2012 (TV Volume-Tennessee/Kentucky).

support of the Assignee's showing that the proposed combination complies with the station ranking portion of the television duopoly rule.

Because there will be nine (9) independently owned and operated television voices in the Knoxville DMA following the proposed assignment, and because neither WMAK(TV) nor WBXX-TV is among the top four ranked stations in the Knoxville DMA, the proposed assignment complies with the Commission's multiple ownership rules. *See* 47 C.F.R. § 73.3555(b).

\* \* \* \* \*

**ATTACHMENT A**  
**(Affidavit of Marcus D. Lamb)**

AFFIDAVIT OF MARCUS D. LAMB

Marcus D. Lamb, being first duly sworn, deposes and says that:

1. My name is Marcus D. Lamb. I am over the age of eighteen and am competent to testify in this matter. This affidavit is made upon my personal knowledge, except where stated upon information and belief.
2. I am President of Word of God Fellowship, Inc. d/b/a Daystar Television Network ("Daystar"). I have held this position since January of 1982.
3. Daystar is the FCC licensee of television station WMAK (TV), Knoxville, Tennessee ("WMAK"), which is located in the Knoxville Designated Market Area ("DMA"). Daystar has been the licensee of the station since July 13, 2009.
4. WMAK is an independent (unaffiliated) station that broadcasts primarily religious programming.
5. Upon information and belief, during the time that Daystar has been the licensee of the station, WMAK has never been one of the top four ranked stations in the Knoxville DMA based on all day (9 a.m. to midnight) audience share, as measured by Nielsen Media Research.

FURTHER AFFIANT SAYETH NOT:

  
\_\_\_\_\_  
Marcus D. Lamb

STATE OF TEXAS

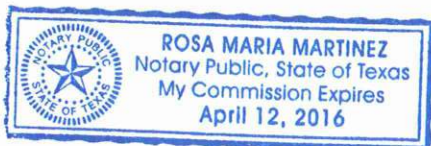
COUNTY OF DALLAS

I certify that the following person personally appeared before me this day, acknowledging to me that he voluntarily signed the foregoing document for the purpose stated therein and in the capacity indicated: Marcus D. Lamb, President of Word of Fellowship, Inc.

Date: NOV 8, 2012

  
\_\_\_\_\_  
Official Signature of Notary Public

Rosa Maria Martinez  
\_\_\_\_\_  
Printed or Typed Name of Notary Public



My Commission Expires: April 12, 2016

**ATTACHMENT B**  
**(Affidavit of David A. Hanna)**

AFFIDAVIT OF DAVID A. HANNA

David A. Hanna, being first duly sworn, deposes and says that:

1. My name is David A. Hanna. I am over the age of eighteen and am competent to testify in this matter. This affidavit is made upon my personal knowledge, except where stated upon information and belief.

2. I am President of Knoxville TV LLC ("Knoxville TV"). I have held this position since January 2011.

3. Knoxville TV is the FCC licensee of television station WBXX-TV, Crossville, Tennessee ("WBXX"), which is located in the Knoxville Designated Market Area ("DMA"). Knoxville TV has been the FCC licensee of WBXX since May 6, 2011.

4. WBXX is affiliated with the CW Network.

5. Upon information and belief, during the time that Knoxville TV has been the licensee of the station, WBXX has never been one of the top four ranked stations in the Knoxville DMA based on all day (9 a.m. to midnight) audience share, as measured by Nielsen Media Research.

FURTHER AFFIANT SAYETH NOT:



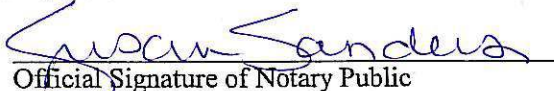
David A. Hanna

COMMONWEALTH OF VIRGINIA

CITY/COUNTY OF HAMPTON

I certify that the following person personally appeared before me this day, acknowledging to me that he voluntarily signed the foregoing document for the purpose stated therein and in the capacity indicated: David A. Hanna, President of Knoxville TV LLC.

Date: 11/5/2012



Official Signature of Notary Public

Susan Sanders  
Printed or Typed Name of Notary Public

My Commission Expires: 8/31/2014



Susan Sanders  
NOTARY PUBLIC  
Commonwealth of Virginia  
Reg. #7036374  
My Commission Expires  
August 31, 2014