

MULTIPLE OWNERSHIP SHOWING

With this application, WLNYEAT, LLC (“WLNYEAT”) proposes to acquire television station WLNY-TV, Facility Id. No. 73206, Riverhead, New York (“WLNY-TV”), from WLNY Limited Partnership. The members of WLNYEAT are TVPEAT, Inc. (“TVPEAT”) and CBS LITV LLC (“CBS”).

Neither TVPEAT nor any person that holds an attributable interest in WLNY-TV through TVPEAT as a result of this transaction holds an attributable interest in any other full power broadcast radio or television station.

CBS, however, is an indirect wholly owned subsidiary of CBS Corporation. Because of CBS’s interest in and control of WLNYEAT, as more fully described in Exhibits 12 and 13, the acquisition of WLNY-TV implicates two of the Commission’s multiple ownership rules: (1) the local television multiple ownership rule and (2) the radio-television cross-ownership rule. As demonstrated below, the acquisition of WLNY-TV will comply with the local television multiple ownership rule and the radio-television cross-ownership rule.

I. Local Television Multiple Ownership Rule

CBS Corporation currently owns one other television station in the New York DMA, WCBS-TV, Facility Id. No. 9610, New York, New York (“WCBS-TV”). Therefore, as a result of this transaction, CBS Corporation will own two television stations in the New York DMA.

Section 73.3555(b) of the Commission’s rules permits common ownership of two television stations in the same Nielsen DMA if: (1) at least eight independently owned and operating full-power commercial and/or noncommercial television stations with overlapping signals would remain in the relevant DMA post-merger; and (2) at least one of the stations to be commonly owned is not ranked among the top four stations in the relevant DMA, as measured by audience share.

This combination complies with Section 73.3555(b). First, sixteen independently owned and operating, full-power commercial and noncommercial television stations with overlapping signals will remain in the New York DMA following the consummation of the proposed transaction, as reflected in the attached Table A. Second, as demonstrated below, WLNY-TV is not among the top four-ranked stations in the New York DMA, as measured by audience share:

Nielsen Ratings for New York DMA for the Nov 2011 Sweep (28 days) M-SU 9am – 12m:

#1	WABC / ABC	3.8/9
#2	WCBS / CBS	3.5/8
#3	WNYW / FOX	2.5/6
#4	WNBC / NBC	2.4/6
#5	WXTV / UNIVISION	1.7/4

#6	WPIX / CW	1.3/3
#7	WNJU / TELEMUNDO	1.2/3
#8	WWOR / IND	0.7/2
#9	WPXN / ION	0.4/1
#10	WLNY / IND	0.2/0

Source: Nielsen, Nov'11, Live+SD

Accordingly, common ownership of WLNY-TV and WCBS-TV is fully consistent with the Commission's local television multiple ownership rule.

II. Radio-Television Cross-Ownership Rule

As noted above, CBS Corporation owns WCBS-TV, New York, New York. Additionally, CBS Corporation controls the following six radio stations (collectively, the "CBS Radio NY Stations") in the New York City Arbitron Metro, which are licensed to CBS Radio East Inc., a subsidiary of CBS Corporation:

Station	Facility ID	Community of License
WCBS(AM)	9636	New York, NY
WCBS-FM	9611	New York, NY
WFAN(AM)	28617	New York, NY
WINS(AM)	25451	New York, NY
WWFS(FM)	25442	New York, NY
WXRK(FM)	58579	New York, NY

The radio-television cross-ownership rule, Section 73.3555(c), is triggered in cases where a 60 dBμ (1 mV/m) FM contour or a 2 mV/m AM contour encompasses the entire community of license of a commonly owned TV broadcast station. It is also triggered whenever a TV broadcast station Grade A contour encompasses the entire community of a commonly owned radio station. Although the FCC Rules are silent regarding digital television service contours with respect to cross ownership, it is understood that the noise-limited DTV service contour (36 dBμ F(50,90)) is temporarily being utilized for this purpose. *See Letter to Stephen Diaz Gavin, Esq.*, 25 FCC Rcd 1851 (2010).

Notwithstanding CBS's ownership of the CBS Radio NY Stations in the New York City Arbitron Metro, the proposed acquisition of WLNY-TV by WLNYEAT does not trigger the Commission's radio-television cross-ownership rule. As shown on the attached map, the noise-limited DTV contour of WLNY-TV does not encompass all of New York, New York, the community of license of the CBS Radio NY Stations. Furthermore, none of the 1 mV/m (60 dBμ) FM contours or the 2 mV/m AM contours of the CBS Radio NY Stations encompass all of Riverhead, New York, WLNY-TV's community of license.

Therefore, for purposes of the radio-television cross-ownership rule, CBS Corporation's radio and television station holdings in the New York City Arbitron Metro are deemed to consist of two separate combinations, as follows:

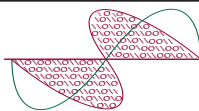
- WLNY-TV, Riverhead, New York, which is the subject of this application; and
- WCBS-TV, WCBS(AM), WCBS-FM, WFAN(AM), WINS(AM), WWFS(FM), and WXRK(FM), all licensed to New York, New York, which is CBS Corporation's existing ownership cluster. This combination of one television station and six radio stations is one station less than the combination of two television stations and six radio stations or one television station and seven radio stations permitted in the New York City Arbitron Metro.

TABLE A

Count	Call Sign	Channel	DTV Channel	Affiliation	City of License	County	State of License	Parent	Power	HAAT	Type Service	Contour Overlap
1	WABC-TV	7	7	ABC	New York	New York	NY	ABC/Disney	64.6	1611	MAIN	Yes
2	WFTY-DT	67	23	TLF	Smithtown	Suffolk	NY	Broadcasting Media Partners Inc	2630	719	SAT	Yes
2	WFUT-DT	68	30	TLF	Newark	Essex	NJ	Broadcasting Media Partners Inc	2630	1391	MAIN	Yes
2	WXTV-DT	41	40	UNI	Paterson	Passaic	NJ	Broadcasting Media Partners Inc	2340	1381	MAIN	Yes
3	WCBS-TV	2	33	CBS	New York	New York	NY	CBS Corporation	45	1276	MAIN	N/A
3	WLNY-TV	0	47	IND	Riverhead	Suffolk	NY	CBS Corporation	0	0	MAIN	N/A
4	WPXN-TV	31	0	ION	New York	New York	NY	CIG Media LLC	2820	1558	MAIN	Yes
5	WNBC	4	28	NBC	New York	New York	NY	Comcast/NBC	17.4	1690	MAIN	Yes
5	WNJU	47	36	TEL	Linden	Union	NJ	Comcast/NBC	4570	1509	MAIN	Yes
6	WEDW	49	49	PBS	Bridgeport	Fairfield	CT	Connecticut Public Broadcasting Inc	1950	728	PUB	Yes
7	WNYE-TV	25	24	PUB	New York	New York	NY	Department of Education New York City	2450	1296	PUB	Yes
8	WFME-TV	66	29	IND	West Milford	Passaic	NJ	Family Stations Inc	24	712	PUB	Yes
9	WMBC-TV	63	18	IND	Newton	Sussex	NJ	Mountain Broadcasting Corp (NJ)	2190	732	MAIN	Yes
10	WSAH	43	42	RTV	Bridgeport	Fairfield	CT	Multicultural Capital Trust	2290	510	MAIN	Yes
11	WNJB	58	8	PBS	New Brunswick	Middlesex	NJ	New Jersey Public Broadcasting Authority	1320	732	PUB	Yes
11	WNJN	50	51	PBS	Montclair	Essex	NJ	New Jersey Public Broadcasting Authority	1225	764	PUB	Yes
12	WNYW	5	44	FOX	New York	New York	NY	News Corporation	17.4	1690	MAIN	Yes
12	WWOR-TV	9	0	My	Secaucus	Hudson	NJ	News Corporation	61.7	1641	MAIN	Yes
13	WPIX	11	11	CW	New York	New York	NY	Tribune Company	58.9	1660	MAIN	Yes
14	WTBY-TV	54	27	TBN	Poughkeepsie	Dutchess	NY	Trinity Broadcasting Network Inc	5000	1608	MAIN	Yes
15	WLIW	21	21	PBS	Garden City	Nassau	NY	WNET.ORG	2735	403	PUB	Yes
15	WNET	13	13	PBS	Newark	Essex	NJ	WNET.ORG	60.3	1641	PUB	Yes
16	WRNN-TV	0	48	IND	Kingston	Ulster	NY	WRNN-TV	0	0	MAIN	Yes

16 independently owned and operating, full-power commercial and noncommercial TV stations with overlapping signal contours.

Source: BIA Media Access Pro Database (Version 4.6) (data as of 12/13/2011).



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WLNY-TV Riverhead, NY Radio - Television Crossownership

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