

**FCC Form 315**

**Transfer of Control of Benedek License Corporation  
from Stations Holding Company, Inc., Debtor in Possession  
to Gray Communications Systems, Inc.**

**EXHIBIT 17**  
**Section IV, Question 8(a)**  
**Compliance With TV Duopoly Rule**

In this Form 315 application, Gray Communications Systems, Inc. ("Gray" or "Transferee") requests consent to acquire control of Benedek License Corporation ("BLC") and its stations listed in Section III, Question 3.

These stations include Kansas stations KAKE-TV (Ch. 10) (Wichita), KLBY (Ch. 4) (Colby), and KUPK-TV (Ch. 13) (Garden City). Stations KLBY and KUPK-TV have long rebroadcast the ABC network and other programming of co-owned parent station KAKE-TV. As shown in the December 8, 1999, Engineering Statement of consulting engineers Smith and Fisher (see Annex A), however, the Grade B contours of KAKE-TV, KLBY and KUPK-TV do not overlap. Licensee BLC has advised Transferee that the conclusion remains accurate today as the stations continue to operate with essentially the same technical facilities. Because there is no Grade B contour overlap between the stations, Gray's proposed co-ownership of KAKE-TV, KLBY and KUPK-TV complies with Section 73.3555(b)(i) of the TV duopoly rule.

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Annex A to Exhibit 17

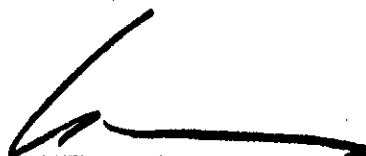
ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of BENEDEK LICENSE CORPORATION in support of its Application for the Assignment of the Licenses of KAKE-TV, Wichita, KUPK-TV, Garden City, and KLBY(TV), Colby, all of which are in Kansas.

Attached hereto is a map which shows the Grade B contours of the three stations. As indicated, the KAKE-TV Grade B contour comes nowhere near those of KUPK-TV and KLBY. The KUPK-TV and KLBY Grade B contours are nearly tangent, but do not overlap. The KUPK-TV Grade B contour extends 89.91 kilometers toward KLBY, and the KLBY Grade B contour extends 97.99 kilometers toward KUPK-TV. With the spacing between the stations being 188.09 kilometers, overlap is avoided by 0.19 kilometers. Of course, since there is no Grade B contour overlap between these stations, there is also no overlap of the Grade A or City Grade contours.

According to the 1990 U.S. Census, the population of Wichita is 304,011; the population of Garden City is 24,097; and the population of Colby is 5,396.

I declare under penalty of perjury that the foregoing statements and the attached exhibit, which was prepared under my immediate supervision, are true and correct to the best of my knowledge and belief.



NEIL M. SMITH

December 8, 1999

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WORLD AERONAUTICAL CHART  
SCALE 1:1,000,000

