

MULTIPLE OWNERSHIP SHOWING

Journal Broadcast Corporation (“Journal”) hereby demonstrates that grant of the instant application will be fully consistent with the Commission’s local radio multiple ownership rule and radio-television cross ownership rule. By this application, Journal proposes to construct a new auxiliary antenna for KSRZ(FM), Omaha, Nebraska, Facility ID No. 50308. Grant of the application will not create new or increased concentration of ownership among commonly owned, operated or controlled media properties. KSRZ(FM) has been, and will remain, in the Omaha-Council Bluffs, Nebraska-Iowa Nielsen Audio market and the Omaha, Nebraska television Designated Market Area (“DMA”).

Local Radio Ownership Rule Compliance

The Commission’s local radio multiple ownership rule provides that in markets with 30 to 44 full-power, commercial and noncommercial radio stations, one party may have a cognizable interest in licenses of not more than seven commercial radio stations, no more than four of which are in the same service (AM or FM). 47 C.F.R. § 73.3555(a)(1)(ii). The Commission defines the relevant market to be the “Arbitron Metro” (now known as “Nielsen Audio Metro”), in those markets so designated by Nielsen Audio. *See 2002 Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, 18 FCC Rcd 13620, 13712-13 (2003).

For purposes of the local radio ownership rule, KSRZ(FM), Omaha, Nebraska is deemed to be part of the Omaha-Council Bluffs, Nebraska-Iowa Nielsen Audio Metro. According to BIA Advisory Service, LLC's *Media Access Pro* database as of June 30, 2014 (*see* the attached *FCC Geographic Market Definition Report for the Omaha-Council Bluffs Metro*), there are 31 full-power, commercial and noncommercial radio stations licensed to communities within the Omaha-Council Bluffs Metro or which Nielsen Audio designates as "home" to the Omaha-Council Bluffs Metro. Accordingly, the current local radio ownership rule permits Journal to have a cognizable interest in up to seven commercial radio stations (with four in the same service) in the Omaha-Council Bluffs Metro. As shown on the attached *FCC Geographic Market Definition Report for Omaha-Council Bluffs, NE-IA*, Journal has a cognizable interest in five commercial radio stations (1 AM and 4 FM stations) in the Omaha-Council Bluffs Metro and will continue to have a cognizable interest in five commercial radio stations (1 AM and 4 FM stations) upon a grant of the instant application.

For the reasons set forth herein, a grant of this application is fully consistent with the local radio ownership rule.

Radio-Television Cross Ownership Rule Compliance

Journal is the licensee of KMTV-TV, Omaha, Nebraska (Facility ID No. 35190). KMTV-TV is located in the Omaha DMA. Journal also has an attributable interest in five radio stations in the DMA, which are referenced above.

The radio-television cross ownership rule is triggered when either (i) the Grade A contour of a television station encompasses the community of license of a commonly owned radio station, or (ii) when the 1 mV/m contour of a FM station or the 2 mV/m contour of an AM

station encompasses the community of license of a commonly owned television station. Since KMTV-TV and each of the five radio stations controlled by Journal in the DMA are licensed to the community of Omaha, Nebraska, it is self-evident that contour encompassment triggers the radio-television cross ownership rule in this instance.

Although the radio-television cross ownership rule is triggered by contour encompassment, the Commission determines compliance with the rule on a Nielsen Audio Metro basis. Section 73.3555(c)(2)(i)(A) of the Rules provides that, in a market where at least 20 independently owned media voices will remain following the proposed transaction, to the extent permitted by Section 73.3555(a) of the Rules, an entity may hold attributable interests in two commercial television and six commercial radio stations. As shown in the attached tables, at least 22 independently owned radio voices alone will remain in the Omaha market following the minor modification proposed herein. Therefore, common ownership of one television and five radio stations in the Omaha market complies with the radio-television cross ownership rule.

FCC Geographic Market Definition for Omaha-Council Bluffs, NE-IA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KBBX	FM	97.7	C	Mexican	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Connoisseur Media LLC	Nebraska City, NE	Otoe
KBLR	FM	97.3	C	Country	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Walnut Radio LLC	Blair, NE	Washington
KCRO	AM	660	C	Chrst/Talk	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Salem Communications Corporation	Omaha, NE	Sarpy
KEZO	FM	92.3	C	Rock	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Journal Broadcast Group Inc	Omaha, NE	Sarpy
KFAB	AM	1110	C	News/Talk	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Clear Channel Communications Inc	Omaha, NE	Sarpy
KFFF	FM	93.3	C	Country	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Clear Channel Communications Inc	Bennington, NE	Douglas
KGBI	FM	100.7	C	ChrsContem	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Salem Communications Corporation	Omaha, NE	Sarpy
KGOR	FM	99.9	C	Clsc Hits	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Clear Channel Communications Inc	Omaha, NE	Sarpy
KIOS	FM	91.5	NC	News/Jazz	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Douglas County School District 001	Omaha, NE	Douglas
KISO	FM	96.1	C	Top 40	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Clear Channel Communications Inc	Omaha, NE	Sarpy
KIWR	FM	89.7	NC	Alternative	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Iowa Western Community College	Council Bluffs, IA	Pottawattamie
KKCD	FM	105.9	C	Clsc Rock	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Journal Broadcast Group Inc	Omaha, NE	Sarpy
KLNG	AM	1560	C	Chrst/Talk	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Wilkins Communications Network Inc	Council Bluffs, IA	Pottawattamie
KMLV	FM	88.1	NC	ChrsContem	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Educational Media Foundation	Ralston, NE	Douglas
KMMQ	AM	1020	C	Span/AdHts	Omaha-Council Bluffs, NE-IA	07/02/2003	75	NRG Media LLC	Plattsmouth, NE	Cass
KOIL	AM	1290	C	News/Talk	Omaha-Council Bluffs, NE-IA	07/02/2003	75	NRG Media LLC	Omaha, NE	Sarpy
KOMJ	AM	1490	C	Adlt Stndrd	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Cochise Broadcasting LLC	Omaha, NE	Sarpy
KOOO	FM	101.9	C	Adult Hits	Omaha-Council Bluffs, NE-IA	07/02/2003	75	NRG Media LLC	La Vista, NE	Sarpy
KOPW	FM	106.9	C	Rhymc/R&B	Omaha-Council Bluffs, NE-IA	07/02/2003	75	NRG Media LLC	Plattsmouth, NE	Cass
KOTK	AM	1420	C	Span/Chrst	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Salem Communications Corporation	Omaha, NE	Sarpy
KOZN	AM	1620	C	Sports	Omaha-Council Bluffs, NE-IA	07/02/2003	75	NRG Media LLC	Bellevue, NE	Sarpy
KQCH	FM	94.1	C	CHR	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Journal Broadcast Group Inc	Omaha, NE	Douglas
KQKQ	FM	98.5	C	Modern AC	Omaha-Council Bluffs, NE-IA	07/02/2003	75	NRG Media LLC	Council Bluffs, IA	Pottawattamie
KSRZ	FM	104.5	C	Hot AC	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Journal Broadcast Group Inc	Omaha, NE	Sarpy
KVNO	FM	90.7	NC	Classical	Omaha-Council Bluffs, NE-IA	07/02/2003	75	University of Nebraska	Omaha, NE	Douglas
KVSS	FM	102.7	C	Christian	Omaha-Council Bluffs, NE-IA	05/04/2010	75	VSS Catholic Communications Inc	Papillion, NE	Sarpy
KXKT	FM	103.7	C	Country	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Clear Channel Communications Inc	Glenwood, IA	Cass
KXSP	AM	590	C	Sports	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Journal Broadcast Group Inc	Omaha, NE	Sarpy
KYFG	FM	88.9	NC	Chrst/Talk	Omaha-Council Bluffs, NE-IA	07/02/2003	75	Bible Broadcasting Network Inc	Omaha, NE	Douglas
KZLW	FM	90.1	NC	Religion	Omaha-Council Bluffs, NE-IA	03/10/2011	75	Calvary Chapel Of Omaha	Gretna, NE	Sarpy
KZOT	AM	1180	C	Nws/Tlk/Spt	Omaha-Council Bluffs, NE-IA	07/02/2003	75	NRG Media LLC	Bellevue, NE	Sarpy

Number of Stations in Geographic Market 31

Previous Stations in Geographic Market

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

Omaha-Council Bluffs, NE-IA Independent Radio Voices

Voices	Call Signs	AM, FM or FX	City of License	State of License	Parent	AM Frequency	FM Frequency	Power-Day/FM	Power-Night	HAAT	Class
1	KYFG	FM	Omaha	NE	Bible Broadcasting Network Inc	0	88.9	1.5	0	482	A
2	KZLW	FM	Gretna	NE	Calvary Chapel Of Omaha	0	90.1	100	0	69	C1
3	KFAB	AM	Omaha	NE	CC Media Holdings Inc	1110	0	50	50	0	A
3	KFFF	FM	Bennington	NE	CC Media Holdings Inc	0	93.3	8.5	0	558	C3
3	KGOR	FM	Omaha	NE	CC Media Holdings Inc	0	99.9	115	0	1214	C0
3	KISO	FM	Omaha	NE	CC Media Holdings Inc	0	96.1	82	0	1086	C0
3	KXKT	FM	Glenwood	IA	CC Media Holdings Inc	0	103.7	100	0	1086	C0
4	KOMJ	AM	Omaha	NE	Cochise Broadcasting LLC	1490	0	1	1	0	C
5	KBBX	FM	Nebraska City	NE	Connoisseur Media LLC	0	97.7	100	0	978	C1
6	KIOS	FM	Omaha	NE	Douglas County School District 001	0	91.5	55	0	554	C1
7	KMLV	FM	Ralston	NE	Educational Media Foundation	0	88.1	59	0	1280	C0
8	KIWR	FM	Council Bluffs	IA	Iowa Western Community College	0	89.7	100	0	1070	C
9	KEZO	FM	Omaha	NE	Journal Communications Inc	0	92.3	100	0	1184	C0
9	KKCD	FM	Omaha	NE	Journal Communications Inc	0	105.9	50	0	479	C2
9	KQCH	FM	Omaha	NE	Journal Communications Inc	0	94.1	100	0	1184	C
9	KSRZ	FM	Omaha	NE	Journal Communications Inc	0	104.5	100	0	1088	C0
9	KXSP	AM	Omaha	NE	Journal Communications Inc	590	0	5	5	0	B
10	KMMQ	AM	Plattsmouth	NE	NRG Media LLC	1020	0	50	1.4	0	B
10	KOIL	AM	Omaha	NE	NRG Media LLC	1290	0	5	5	0	B
10	KOOO	FM	La Vista	NE	NRG Media LLC	0	101.9	100	0	1198	C0
10	KOPW	FM	Plattsmouth	NE	NRG Media LLC	0	106.9	25	0	328	C3
10	KOZN	AM	Bellevue	NE	NRG Media LLC	1620	0	10	1	0	B
10	KQKQ	FM	Council Bluffs	IA	NRG Media LLC	0	98.5	100	0	1102	C
10	KZOT	AM	Bellevue	NE	NRG Media LLC	1180	0	25	1	0	B
11	KCRO	AM	Omaha	NE	Salem Communications Corporation	660	0	1	0.054	0	D
11	KGBI	FM	Omaha	NE	Salem Communications Corporation	0	100.7	100	0	1014	C0
11	KOTK	AM	Omaha	NE	Salem Communications Corporation	1420	0	1	0.33	0	B
12	KVNO	FM	Omaha	NE	University of Nebraska	0	90.7	8.9	0	646	C2
13	KVSS	FM	Papillion	NE	VSS Catholic Communications Inc	0	102.7	46.1	0	1343	C1
14	KBLR	FM	Blair	NE	Walnut Radio LLC	0	97.3	25	0	302	C3
15	KLNG	AM	Council Bluffs	IA	Wilkins Communications Network Inc	1560	0	10	0	0	D

15 Independent Radio Voices. (Source: BIA Media Access PRO Database, BIA Advisory Services, LLC, as of 06/30/2014)

Omaha, Nebraska Independent TV Voices

Voices	Call Signs	Channel	DTV Channel	Affiliation	City of License	County	State of License	Parent	Power	HAAT	Type Service
1	WOWT-TV	6	22	NBC	Omaha	Sarpy	NE	Gray Television Inc	100	1371	MAIN
2	KETV	7	20	ABC	Omaha	Sarpy	NE	Hearst Corporation, The	316	1373	MAIN
3	KBIN-TV	32	33	PBS	Council Bluffs	Pottawattamie	IA	Iowa Public Broadcasting Board	575	322	PUB
3	KHIN	36	35	PBS	Red Oak	Montgomery	IA	Iowa Public Broadcasting Board	2040	1558	PUB
N/A	KMTV-TV	3	45	CBS	Omaha	Sarpy	NE	Journal Communications Inc	100	1371	MAIN
4	KYNE-TV	26	17	PBS	Omaha	Sarpy	NE	Nebraska Educational Telecomm Commission	525	427	PUB
5	KPTM	42	43	FOX	Omaha	Sarpy	NE	Sinclair Broadcast Group Inc	4800	1558	MAIN
5	KXVO	15	38	CW	Omaha	Sarpy	NE	Sinclair Broadcast Group Inc	5000	1486	MAIN

5 Independent TV Voices. (Source: BIA Media Access PRO Database, BIA Advisory Services, LLC, as of 06/30/2014)

Omaha, Nebraska Independent Newspaper Voice

Voice	Newspaper	Owner	Circulation (Eng M-F)	2014 DMA Population	Percentage
1	Omaha World-Herald	Berkshire Hathaway Inc.	125,470	421,960	29.74%

1 Independent Radio Voice. (Sources: Omaha World-Herald; Nielsen 2014 Local Television Market Universe Estimates)

Omaha, Nebraska Independent Cable Voice

Voice	Cable System	Owner	County of Operation
1	Cox Communications	Cox Communications, Inc.	Douglas County

1 Independent Cable Voice.