

Attachment A

WLAX-WEUX CONTOUR OVERLAP MAP

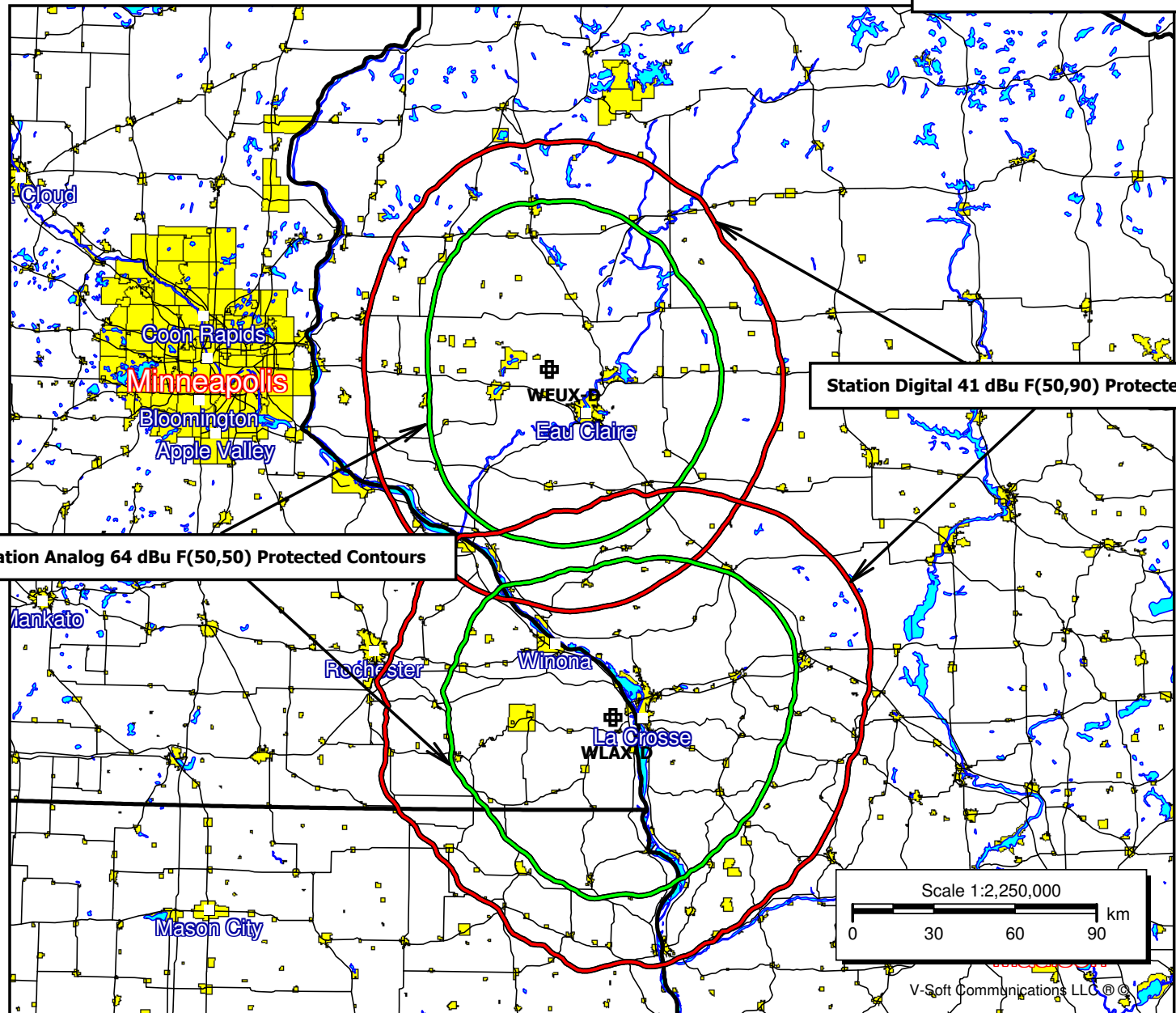
Greg Best Consulting, Inc.

WLAX-D

BLCDT20081105ABY
Latitude: 43-48-16.10 N
Longitude: 091-22-19.30 W
ERP: 852.00 kW
Channel: 17
Frequency: 491.0 MHz
AMSL Height: 565.9 m
Elevation: 367.6 m
HAAT: 297.3 m
Horiz. Pattern: Directional
Vert. Pattern: Yes
Elec Tilt: 1.0
Prop Model: None

WEUX-D

BLCDT20090331ACJ
Latitude: 44-57-24 N
Longitude: 091-40-03 W
ERP: 1000.00 kW
Channel: 49
Frequency: 683.0 MHz
AMSL Height: 529.0 m
Elevation: 385.0 m
HAAT: 223.1 m
Horiz. Pattern: Directional
Vert. Pattern: Yes
Elec Tilt: 0.7
Prop Model: None



Attachment B

November 19, 2013

Barbara Kreisman, Esq.
Chief, Video Division
Media Bureau
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20536

Re: Request for of the Satellite Waiver of WEUX, licensed to Chippewa Falls, Wisconsin with WLAX as the parent station licensed to La Crosse, Wisconsin.

Dear Ms. Kreisman:

I have been requested to provide comments regarding the merits of continuing the operation of WEUX as a satellite of WLAX both operating in the La Crosse- Eau Claire DMA as defined by Nielsen. This letter also addresses the feasibility of operating and marketing WEUX as a standalone operation rather than as a satellite of WLAX.

I have over 40 years in the broadcast industry in several categories including ownership, management and brokerage and appraisal of broadcast stations. I am the founder and president of CobbCorp, LLC and a founder and former Managing Director of Media Venture Partners, both nationally recognized brokerage and appraisal firms. During the last 30 years, I have been personally involved in the brokerage of more full power television stations than any other broker. I am a former President of the National Association of Media Brokers and a recipient of the Broadcast Foundation of America's Leadership Award.

The Commission has set out three criteria under which the FCC will presume that the common ownership of a main station serve in the public interest:

1. There is no city grade overlap between the parent and the satellite station;
2. The satellite station would provide service to an underserved area;
3. No alternative operator is ready and able to construct or purchase the satellite to operate as a full service facility.

In regards to the first criteria, while there is a degree of overlap between the current digital protected contours of WEUX and WLAX, the stations' former analog City grade contours did not overlap.

With respect to the second criteria, WEUX is licensed to Chippewa Falls and the station's signal covers the Eau Claire area of the DMA that WLAX does not reach with a city grade or a 41dBu signal. As a satellite of WLAX, these communities are able to receive FOX network programming as well as local news. Without this satellite, this programming would not be available to those viewers since WLAX is located approximately 90 miles away.

Regarding the third criterion, if WEUX was attempting to operate as a standalone operation, it would be without a big 4 network affiliation. With no major affiliation and a signal that did not cover La Crosse and Winona, the most populous area of the DMA, WEAU's ability to compete would be severely

impaired. The total television market revenue in this one hundred and twenty-eighth ranked television market is only about \$30,000,000 with five entities fighting for the advertising dollars. It is my opinion that a station with a severely hampered signal and no major affiliation would not be able to capture enough revenue to survive let alone offer meaningful programming to this small community. I don't believe that there is a qualified prospective buyer that would be willing to operate a station at such a competitive disadvantage.

It is my opinion that the community of license and the entire DMA is better served with WEUX being a satellite of WLAX.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. E. Cobb", with a stylized flourish at the end.

Brian E. Cobb