

COMPLIANCE WITH MULTIPLE OWNERSHIP RULES

The following demonstrates that Multimedia Holdings Corporation and its parent, Gannett Co., Inc. (“Gannett”), will continue to be in compliance with the Commission’s multiple and cross-ownership rules following the proposed assignment of KTVD(TV), Denver, Colorado. Gannett’s existing media interests include ownership (directly or through subsidiaries) of television stations, as discussed in Exhibit No. 13, and daily newspapers.¹

Section 73.3555(b) of the Commission’s rules permits common ownership of two television stations within the same Designated Market Area (“DMA”) if: (1) at least eight independently owned and operating full-power television stations (commercial and noncommercial) will remain “post-merger” and (2) one of the stations is not among the top four-ranked stations in the market based on audience share (the “eight voice/top four-ranked station standard”). For purposes of determining compliance with this standard, stations with Grade B signal contours overlapping with the Grade B contour of at least one of the stations in a proposed combination are included in calculating the number of stations in the DMA.

Gannett, through its subsidiary Multimedia Holdings Corporation, currently owns and operates KUSA-TV (Channel 9, NBC), Denver, Colorado (Facility ID # 23074). According to the October Nielsen Rating Summary, KUSA-TV is the second-ranked station in the Denver

¹ Gannett (directly or through subsidiaries) controls several daily newspapers, none of which (with the exception of *The Arizona Republic*, see note 6 below) is published in a community encompassed by the pertinent service contour of any Gannett station, or of KTVD(TV), as defined in Section 73.3555 of the Commission’s rules.

DMA—the 18th largest DMA in the country²—based on audience share. The instant application seeks FCC consent to the assignment of the license of KTVD(TV) (Channel 20, UPN), Denver, Colorado (Facility ID # 68581), which also is located in the Denver DMA, to Multimedia Holdings Corporation (“KTVD assignment application”). Upon grant and consummation of the KTVD assignment application, Gannett, through its subsidiary, Multimedia Holdings Corporation, also will own KTVD(TV), which is the fifth-ranked station in the Denver DMA based on audience share in the October 2005 Nielsen Rating Summary.

Gannett’s common ownership, through Multimedia Holdings Corporation, of KUSA-TV and KTVD(TV) will comply with the eight voice/top four-ranked station standard because eight independently owned and operating full-power television stations (commercial and noncommercial) will remain in the Denver DMA after Gannett’s acquisition of KTVD(TV) (i.e., “post-merger”). See Appendix 1. The Grade B contours of each of the other stations listed overlap with the Grade B contours of both of the stations in the proposed combination. Moreover, only one of the stations to be owned by Gannett is among the top four-ranked stations in the Denver market based on audience share.

Accordingly, Multimedia Holdings Corporation certifies that the proposed assignment complies with the Commission’s multiple- and cross-ownership rules.

² See Television & Cable Factbook 2005, Stations Vol. 1, at A-360; October 2005 Nielsen Rating Summary.

DENVER, COLORADO DMA**Full-Power Independent Television Stations
(Commercial and Non-Commercial)¹**

<u>Call Sign</u>	<u>Channel</u>	<u>Community of License</u>	<u>Licensee</u>	<u>Audience Share</u>
KWGN-TV (WBN)	2	Denver, CO	KWGN, Inc.	3.8
KCNC-TV (CBS)	4	Denver, CO	CBS Television Stations, Inc.	11.6
KRMA-TV (PBS)	6	Denver, CO	Rocky Mountain Public Broadcasting Network, Inc.	N/A
KMGH (ABC)	7	Denver, CO	McGraw-Hill Broadcasting Co., Inc.	8.7
KUSA-TV (NBC)	9	Denver, CO	Multimedia Holdings Corp.	10.5
KTFD-TV (TEL)	14	Boulder, CO	Roberts Broadcasting Co. of Denver	0.9

¹ Sources: Broadcasting & Cable Yearbook 2005; Television & Cable Factbook 2005, Stations Vol. 1; FCC's CDBS database; October 2005 Nielsen Rating Summary.

DENVER, COLORADO DMA**Full-Power Independent Television Stations
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<u>Call Sign</u>	<u>Channel</u>	<u>Community of License</u>	<u>Licensee</u>	<u>Audience Share</u>
KTVD (UPN)	20	Denver, CO	Twenver Broadcast, Inc.	4.3
KDEN (IND)	25	Longmont, CO	Longmont Channel 25, Inc.	0.2
KDVR (FOX)	31	Denver, CO	Fox Television Stations, Inc.	5.7
KRMT (IND)	41	Denver, CO	Word of God Fellowship, Inc.	0.1
KCEC (UNV)	50	Denver, CO	Entravision Holdings, LLC	1.8
KWHD (IND)	53	Denver, CO	LeSea Broadcasting of Denver, Inc.	0.2

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<u>Call Sign</u>	<u>Channel</u>	<u>Community of License</u>	<u>Licensee</u>	<u>Audience Share</u>
KPXC-TV (PAX)	59	Denver, CO	Paxson Denver License, Inc.	0.3