

Request for Continued Satellite Authority

SP Granite LLC ("SP Granite"), proposed transferee of control of Granite Broadcasting Company, Debtor-in-Possession ("Granite"), respectfully requests a continuation of Granite's waiver of the Commission's local television ownership rules to permit SP Granite to continue operation of KRII(TV), Chisholm, Minnesota as a satellite of KBJR-TV, Superior, Wisconsin,¹ pursuant to Note 5 of Section 73.3555 of the Commission's rules.² The Commission first authorized Granite to construct and thereafter operate KRII(TV) as a satellite of KBJR-TV in August 2002.³ Since that time, none of the essential facts underlying the operations of these stations have changed. As such, the Applicants respectfully request that the Commission allow KRII(TV) to continue operating as a satellite of KBJR-TV.

Background. The Commission has long recognized the public interest benefits of permitting satellite service to sparsely-settled, underserved rural areas.⁴ In its 1987 *Satellite Policy Inquiry*, the FCC noted that "it appears to us that from the point of view of the population in these [sparsely settled] areas that the advantages are likely to outweigh the disadvantages by a considerable margin."⁵

Pursuant to the Commission's satellite waiver policy, a proposed satellite operation is presumed to be in the public interest if it meets three requirements: (1) no City Grade contour overlap exists between the parent and the satellite; (2) the proposed satellite station will provide service to an underserved area; and (3) no alternative operator is ready and able to purchase and operate the satellite as a full-service station.⁶ Alternatively, if an applicant cannot qualify under this presumptive waiver test, the Commission may employ an *ad hoc* approach to determine whether other compelling circumstances warrant grant of satellite status.⁷ For the reasons set forth below, KRII(TV) qualifies for satellite status under the presumptive waiver test. Thus, the Commission may authorize continuation of satellite status for KRII(TV) without the need to consider other compelling circumstances that also warrant the grant.⁸

No City Grade Overlap. The map included in the attached report of BIA Financial Network ("BIA") demonstrates the lack of overlap between the City Grade contours of KBJR-TV and KRII(TV).⁹ This request therefore satisfies the first requirement.

¹ Granite is the ultimate parent of KBJR License, Inc., licensee of KBJR-TV, and Channel 11 License, Inc., licensee of KRII(TV).

² 47 C.F.R. § 73.3555, Note 5 (2006).

³ See FCC File No. BMPCT-20020220ABA.

⁴ See, e.g., *Basin TV Co.*, 13 RR 392 (1956).

⁵ *Notice of Inquiry and Notice of Proposed Rule Making Concerning Television Satellite Stations*, 2 FCC Rcd 1359, 1362 (1987).

⁶ See 47 C.F.R. § 73.3555, Note 5; *Satellite Order*, 6 FCC Rcd 4212, 4213-14 (1991) ("*Satellite Order*") (subsequent history omitted).

⁷ *Id.*

⁸ Should the Commission determine for some reason that the presumptive waiver test is not satisfied in this case, SP Granite requests that the Commission evaluate this waiver request under the *ad hoc* approach.

⁹ See Mark R. Fratrick, *The Economic Viability of KRII-TV If Operated as a Full-Service Television Station in the Duluth, MN-Superior, WI Television Market*, BIA Financial Network (Jan. 5, 2007),

Underserved Area. This request satisfies the second requirement because KRII(TV)'s community of license, Chisholm, Minnesota, constitutes an "underserved" community for purposes of this analysis. Under the "transmission test," a proposed satellite community of license is considered "underserved" if two or fewer television stations (including commercial, noncommercial, and satellite stations) are already licensed to it.¹⁰ KRII(TV) is the only television station licensed in Chisholm. Indeed, even if the neighboring city of Hibbing, Minnesota, is included as part of the Chisholm "community" for these purposes, the hyphenated community would have only one other television station licensed to it – WIRT(TV), which is itself a satellite of WDIO-TV in Duluth.¹¹ Thus, KRII(TV) provides service to an underserved area.

Inability to Sustain Full-Service Operation. The Commission determined as recently as August 2002 that no alternative operator would be available to operate KRII(TV) as a full-service television station.¹² The economic prospects for any such station in Chisholm have not changed materially and remain extremely poor.

This application seeks a transfer of control of KRII(TV) in connection with the restructuring of Granite under the U.S. Bankruptcy Code. As such, neither SP Granite nor Granite have attempted to seek a purchaser for KRII(TV). Instead, SP Granite commissioned the expert opinion of BIA Financial Network on the viability of KRII(TV) as a stand-alone, full-service television station. The BIA Report demonstrates conclusively that no alternative operator would be ready and able to purchase and operate KRII(TV) as a full-service television station and that it is highly unlikely that a buyer could be found to operate the station on such a basis.¹³

The BIA Report explains that the Duluth-Superior television market already includes four full-service television stations that are affiliated with the major broadcast networks of ABC, NBC, CBS, and Fox.¹⁴ Significantly, the report demonstrates that KRII(TV) reaches the smallest percentage of viewers in the market and its coverage does not include the most populous communities within the market. It is therefore doubtful that KRII(TV) could attract adequate advertising revenue to allow it to compete successfully against the other, established television stations in the market or operate on a profitable basis. Similarly, because KRII(TV)'s coverage area includes only a very small number of viewers of Hispanic descent, the BIA Report concludes that such a small potential audience would be insufficient to sustain a full-service Spanish-language television station. In addition, the two new broadcast networks, CW and MyNetwork, already are affiliated with the digital multicast channels of two of the Big Four affiliates in the market. Finally, due to the aforementioned dearth of advertising revenue opportunities, KRII(TV) would not be able to obtain quality syndicated programming or afford to produce original local programming. As a result, the BIA Report concludes that operation as a non-network affiliated, independent station would not be financially feasible for KRII(TV).

Appendix 1 ("BIA Report").

¹⁰ *Satellite Order*, 6 FCC Rcd 4212 ¶ 19.

¹¹ NTSC Table of Allotments, 47 C.F.R. § 73.606(b); Letter to Hubbard Broadcasting, Inc., 2 FCC Rcd 7374 (1987).

¹² See FCC File No. BMPCT-20020220ABA.

¹³ See BIA Report.

¹⁴ *Id.* at Table 1.

In addition to conquering the market-based barriers noted above, any potential purchaser of KRII(TV) also would need to contend with the costs associated with the transition to digital television. As a post-April 1997 television station, KRII(TV) lacks a paired digital channel.¹⁵ Regardless of whether the station transitions to full service status, KRII(TV) will require capital outlays to convert to digital-only broadcast service at some point in the next three years. This significant capital expenditure increases the likelihood that KRII(TV) would not be able to operate profitably or attract a buyer as a full-service station. Moreover, until KRII(TV) launches digital service, the station will remain at a competitive disadvantage to the market's Big Four network affiliates, which already offer digital service for local viewers.

In short, KRII(TV) cannot be sustained as a full-service television station and no alternative operator would be ready, able, or willing to operate KRII(TV) as a full-service station. Only by continuing to permit KRII(TV) to operate as a satellite of KBJR(TV) will the Commission enable KRII(TV) to maintain its economic viability and its ability to provide service to the surrounding underserved area. KRII(TV) consequently satisfies the three requirements under which continued operation as a satellite presumptively serves the public interest.

Commission Precedent. Continuation of KRII(TV)'s satellite status would be consistent with Commission precedent. As noted, the Commission authorized Granite to construct KRII(TV) as a satellite of KBJR-TV less than five years ago in August 2002. Other than Duluth and Superior, the only other community in the Duluth-Superior DMA with a licensed television station is Hibbing, Minnesota, which is located seven miles south of Chisholm. In 1967, the Commission initially authorized the television station licensed to Hibbing, WIRT(TV), as a 100 percent satellite of Duluth station WDIO-TV, and, in 1987, it reauthorized the station's satellite status when Hubbard Broadcasting acquired both television stations.¹⁶

Just days before the filing of this application, the Commission granted continued satellite authority to WQMY(TV) in Williamsport, Pennsylvania under an *ad hoc* approach.¹⁷ In that case, the parent and satellite stations did not have City Grade overlap and the satellite station is the only full-power television station in its community of license. As in Granite's case, the applicants submitted a report from a media consultant "demonstrating the infeasibility of finding a purchaser willing to operate the station on a stand-alone basis."

Conclusion. SP Granite has demonstrated that this request for continued satellite authority satisfies all three prongs of the FCC's presumptive waiver test and that grant of the instant waiver request is consistent with Commission precedent. Operating KRII(TV) as a full-service independent station is simply not feasible given KRII(TV)'s limited coverage area and poor prospects for financial success except as a satellite station. Accordingly, the public interest again would be served by the Commission's authorization of the continued operation of KRII(TV) as a satellite of KBJR(TV). Based upon the foregoing, SP Granite respectfully requests a waiver of the local television ownership rules to permit the transfer of control of Granite's licensee subsidiaries and the continued operation of KRII(TV) as a satellite station of commonly-owned KBJR-TV.

¹⁵ See *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, 12 FCC Rcd 12809, ¶ 18 (1997), *aff'd.*, 13 FCC Rcd 6860 ¶ 11 (1998).

¹⁶ Letter to Hubbard Broadcasting, Inc., 2 FCC Rcd 7374 (1987).

¹⁷ Letter to New Age Media of Pennsylvania License, LLC, DA 07-12 (rel. Jan. 4, 2007).

**THE ECONOMIC VIABILITY OF KRII(TV)
IF OPERATED AS A
FULL-SERVICE TELEVISION STATION
IN THE DULUTH, MN-SUPERIOR, WI
TELEVISION MARKET**

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**THE ECONOMIC VIABILITY OF KRII(TV) (CHISHOLM, MN)
AS A FULL-SERVICE TELEVISION STATION IN THE
DULUTH, MN-SUPERIOR, WI TELEVISION MARKET**

Introduction

Local over-the-air television stations face increasing competitive challenges every day as more options are becoming available to consumers and advertisers. Trying to attract and/or retain viewers at the same time as trying to attract and/or retain advertisers challenge all local, over-the-air television stations. In smaller markets such as Duluth, MN-Superior, WI, these challenges are even more obvious as in these cases the local television advertising revenues are not large.

The FCC has authorized KRII(TV), Chisholm, MN, to operate as a satellite station of co-owned parent station KBJR-TV (NBC affiliate), Superior, WI since KRII(TV) first commenced operations. The stations serve the small but geographically dispersed Duluth, MN-Superior, WI television market in which KRII(TV) is one of only two full-power television stations licensed to the northern region of this market. SP Granite LLC, the proposed Transferee of the licensees of these stations, requests that the FCC continue to authorize KRII(TV) to operate as a satellite of KBJR-TV pursuant to the criteria established in *Television Satellite Stations*, 6 FCC Rcd 4212 (1991). This report concludes that given the local market conditions, KRII(TV)'s relatively disadvantaged signal, the relatively small amount of advertising revenues in the market, and the operating and capital costs the station faces, no alternative operator would be willing and able to purchase or willing and able to operate KRII(TV) as a stand-alone station in this small market. Consequently, maintaining KRII(TV) as a satellite station presents the only viable option available to maintain service to KRII(TV)'s local community.

Duluth, MN-Superior, WI Television Market

Station Lineup

Nielsen Media Research ranks the Duluth, MN-Superior, WI television market as the 137th largest television market in terms of television households. The market includes four full-service television stations, each licensed to either Duluth, MN or Superior, WI, the largest communities in the DMA and affiliated with major networks. The market also includes two commercial full-power stations licensed to the more than 64-mile distant communities of Hibbing, MN and Chisholm, MN, both of which stations have been authorized as satellite stations since their inception. Table 1 summarizes the stations in this market:

Table 1

Duluth, MN-Superior, WI Television Market Full-Power Stations

Calls	Channel	Affiliation	Community of License	Population Served	Percent of Market¹
WDIO-TV	10	ABC	Duluth	194,018	46.0%
KDLH	3	CBS	Duluth	185,113	43.9%
KQDS-TV	21	FOX	Duluth	182,107	43.2%
KBJR-TV	6	NBC	Superior	184,659	43.8%
WIRT	13	ABC	Hibbing	119,038	28.2%
KRII	11	NBC	Chisholm	76,723	18.2%

¹ Table 1 reflects the predicted populations within each station's Grade A contour, as generated by Dataworld, Inc..

As shown, all of the major English-language television networks already have affiliates in the market. In addition, two of these stations are digital multicast CW or My Network affiliates. Consequently, the only other alternatives for KRII(TV) as a full-service station would be to affiliate with one of the Spanish-language networks or to become a pure independent television station.

Populations Reached by Local Television Stations

As shown in the Table 1 and as graphically depicted by the contour maps in Appendix 2, the signals of all of the other television stations licensed to the communities of Duluth, MN and Superior, WI reach substantially more of the television households in the DMA than do the Chisholm and Hibbing satellites.² Conversely, the much smaller signal contour of KRII(TV) does not cover the most populous communities of Duluth, MN and Superior, WI, the economic centers of the market. The ABC affiliate provides coverage to the outlying market area through a satellite station (WIRT-TV), while the NBC and Fox affiliates utilize LPTV stations and/or translators to serve the area. These satellite and low power services are necessary to provide service to these areas due to the distance to the northern outlying areas.

Television Advertising Revenues in Duluth, MN-Superior, WI Market

The Duluth, MN-Superior, WI DMA is ranked 137th in terms of television households and ranked 142nd in terms of total television advertising revenues.³ Due to the limited population, there are very limited television revenues (estimated to have been \$21.2 million for

² The one allocation for which a construction permit has been granted, Channel 27, Duluth, MN will reach 195,517 people within its predicted Grade A contour, according to Dataworld, Inc..

³ *Investing in Television, 2006, 4th edition*, BIA Financial Network.

2005) that are split amongst the existing four full-service television operations in this market. The market will be strained to support another separately-owned, full-service television operation if and when Channel 27 in Duluth becomes operational. The market does not appear to be large enough to support a new, separately-owned, full-service television station if KRII(TV) lost its satellite status, let alone two such stations if Channel 27 also becomes operational.

While market revenue growth is expected to increase, that growth will not be substantial enough to support one or two additional full-service television stations. From 2005 through 2010, the market's television advertising revenues are expected to grow at a 4.1% compounded annual growth rate, as compared to 4.6% for the average television market.⁴ A new independently owned KRII(TV) would need to steal substantial business away from the more powerful existing, established stations in the market, all of which have the advantages of (i) being major network affiliates, (ii) reaching a much larger percentage of the marketplace, and (iii) being based in and providing over-the-air service to the population center (Duluth, MN-Superior, WI) of this television market.

Unused Allocations in the Duluth, MN-Superior, WI Television Market

In addition to the four existing over-the-air, full-service stations, the FCC had allocated three other channels for full-power television stations in this market to Duluth, MN (Channel 27), Superior, WI (Channel 40) and Ironwood, MI (Channel 24). The first two allocations were centrally located and the third was located at a more remote part of the television market.

⁴ Ibid.

While these allotments had been available for a long time, they did not attract any material interest. Indeed, in its landmark April 1997 DTV Report and Order, the FCC deleted the Superior and Ironwood channels due to a lack of interest in these vacant allotments. The third allocation, Channel 27 in Duluth, MN, only received a construction permit in December of 2006. If this full-power station becomes operational over the next few years as a full-service station, it would add even further pressure on the other stations in the market, including KRII(TV).

The fact that these allocations did not attract any material interest over the many years they were available provides strong evidence of the difficulty any new television station operator would face in this market. Two of these allocations were in the center of the local television market and population, and still, only the Duluth allocation was attractive enough to warrant interest recently. KRII(TV), with a service population less than 40% of Channel 27 Duluth, MN, would be even less attractive if it was licensed as a full-service television station.

Reach of KRII(TV)

Overlap

Appendix 1 provides a map detailing the city-grade contours for KRII(TV) and its parent station, KBJR-TV. As can be seen, no overlap exists between the satellite station's city grade contour and the city-grade contour of its parent station.

Populations Served

KRII(TV) reaches approximately 77 thousand people within its Grade A contour, less than one-fifth of the entire local television market. That served population is significantly less than the populations reached by any of the other full-service stations in this market. Having such

a relatively small over-the-air reach would significantly disadvantage this station if it became a full-service television station because the other present full-service television stations have noticeably greater reach.

Each of the other affiliates has combinations of either satellite stations or low-power television stations and translators located throughout the northern portion of the Duluth, MN-Superior, WI market to broaden its reach. Appendix 2 depicts the coverage of the major affiliates and their associated low-power television stations and/or translator stations that enable them to reach more of the Duluth, MN-Superior, WI market. Malara Broadcasting, which owns the full-power television station KDLH-TV (CBS affiliate), also owns four translators and has relationships with eight other translators owned by other organizations to provide better coverage of the population throughout the entire market. In like fashion, Hubbard Broadcasting owns the full-power television station WDIO-TV (ABC affiliate), the satellite station WIRT-TV, and either owns or is affiliated with ten translators. Finally, KQDS Acquisition, which owns the full power television station KQDS-TV (Fox affiliate), owns five LPTV stations and three translators in order to provide service to the entire market.

With much less than one-half of the total reach of these other three television groups, KRIL(TV) would be at a severe disadvantage in competing with these stations. At the same time, KBJR-TV would also be disadvantaged in competing with the other local television groups if it were to lose the over-the-air service now provided by KRIL(TV) in the northern part of the Duluth, MN-Superior, WI television market. Indeed, without KRIL(TV), KBJR-TV would have significantly less reach than the other local television groups.

Finally, due to its limited coverage and the lack of established programming service, KRII(TV) would also face great difficulty in obtaining market-wide carriage on cable television systems and satellite delivered services,⁵ thereby further lessening its viability as a full-service television station.

Included in the populations reached by KRII(TV) are a small number of people of Hispanic descent who might be attracted to Spanish-language programming. At present, there are no local full-power affiliates airing the over-the-air Spanish networks in this market. Yet, given the small size of the populations served (both in general and Hispanic), there is little likelihood that any local station could become a full-service affiliate of a Spanish-language network. Moreover, the Hispanic population reached by KRII(TV) is only 3,424.⁶ That small Hispanic population is too small a total potential audience to support an economically viable full-service station.

Consequently, KRII(TV) would be forced to program as a pure independent station for the foreseeable future. Pure independent stations typically are relegated to inferior programming (like evergreen series) that do not attract very large audiences, and, consequently, do not generate substantial ratings or advertising revenues. Typically, they are unable to generate sufficient revenues to support local news or other local public affairs programming. In this case, KRII(TV)'s small over-the-air market reach would prevent the station from generating sufficient revenues to become viable at all as an independent station.

⁵ Both Dish TV and Direct TV offers local station service to their subscribers in the Duluth, MN-Superior, WI market.

⁶ Demographic information for populations covered under the Grade A contour was generated by Dataworld, Inc.

Served Communities

KRII(TV) serves an area located a substantial distance away from the core market area of Duluth, MN-Superior, WI. Its city of license, Chisholm, MN, is about 64 miles from Duluth and Superior. Some 84,974 people in the Chisholm-Hibbing portion of the Duluth, MN-Superior, WI market receive NBC service only from KRII(TV). In this case, the parent-satellite status has enabled the stations to extend NBC network programming to Chisholm, MN and the surrounding rural area. The Grade B contours of KBJR-TV and KRII(TV) are reflected in Appendix 3.

Additional Capital Costs

In addition to the very limited revenue possibilities for KRII(TV) as a full-service station and the resulting very limited possibilities for this station to become economically viable on an operating basis, another major issue is the significant additional capital costs that this station faces in the next few years to convert to digital transmission. As a satellite station, KRII(TV) will flash-cut to full-power DTV operations on its analog channel at or before the February 2009 deadline. KRII(TV) therefore needs to purchase and install additional capital equipment for digital operations in the near future.

Digital conversion costs are in addition to the meaningful added capital costs that KRII(TV) would incur to convert from satellite status to full-service status. Those costs include necessary improvements to the master control room, commercial and field production equipment, and other ancillary equipment that are necessary to operate as a full-service station, in addition to the costs of local news production, if a new owner chose to offer that service. In

an earlier study analyzing another satellite station, we estimated that the typical conversion costs for a satellite station to become a full-service station exceed \$1.3 million.⁷

In addition to the obstacles described earlier in this report and the considerable capital expenditures detailed above, any new owner of KRII(TV) trying to convert it to a full-service station would have extreme difficulty securing investment capital for such a risky venture. Since KRII(TV) reaches a very limited population base and would have to enter the market as either a Hispanic network affiliate or an independent station, potential lenders are likely to be hesitant to provide the necessary funds. Securing investment funds to purchase KRII(TV) and convert it into an independent full-service station would be very difficult, further reducing its viability as a full-service operation. In our judgment, there would not be any purchaser of KRII(TV) as a full-service operation.

Conclusion

Incredible pressures confront local television stations in smaller markets. Increased numbers of video choices are now available to consumers leading to smaller audiences for local television stations. At the same time, local cable systems are selling local advertising spots on the large number of national cable networks more aggressively while the increasingly local focus of Internet sites adds further competition to the market for local advertising revenues.

Satellite television stations considering switching to full service status face considerable challenges to become economically viable competitors in this ever-changing market. First,

⁷ “The Economic Viability of Operating WTTK-TV as a Full-Service Television Station,” Mark R. Fratrick, May 2, 2002, attachment to the application for the assignment of license, FCC File No. BALCT - 20020502AAQ.

affiliations with one of the major over-the-air television networks are usually not possible as those networks typically already have affiliates in most markets. Second, in order to operate as a full-service station, a new owner must incur significant operating costs. Finally, a new owner must also incur additional large capital costs for a new full-service television station, especially with a station that still needs to construct digital transmission facilities.

Consequently, the economic viability of KRII(TV) as a full-service television station is very questionable. KRII(TV)'s reach within the local Duluth, MN-Superior, WI television market would be much less than any of the other full-service stations. Further, it would make little financial sense for KRII(TV) to become an affiliate of any of the Spanish-language networks or operate as an independent station. Finally, substantial capital expenditures must be incurred if KRII(TV) converted to a full-service station. For these reasons, there appears to be little chance that anyone could convert KRII(TV) to a full-service station *on an economically viable basis*. Thus, to preserve KRII(TV)'s over-the-air service in this rural area, the television station must continue to operate as a satellite of another station in this market.

Appendix 1 – City Grade Contours of Parent and Satellite Stations

KBJR-TV & KRII(TV)



CANADA
ONTARIO

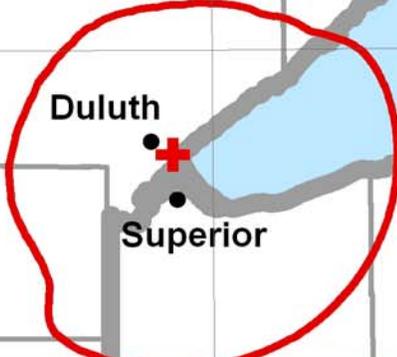
KRII(TV) 77 dBuV/m City Grade



Chisholm

Lake Superior

MINNESOTA

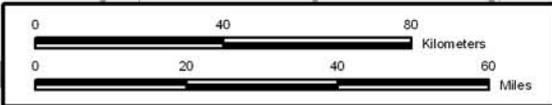


Duluth

Superior

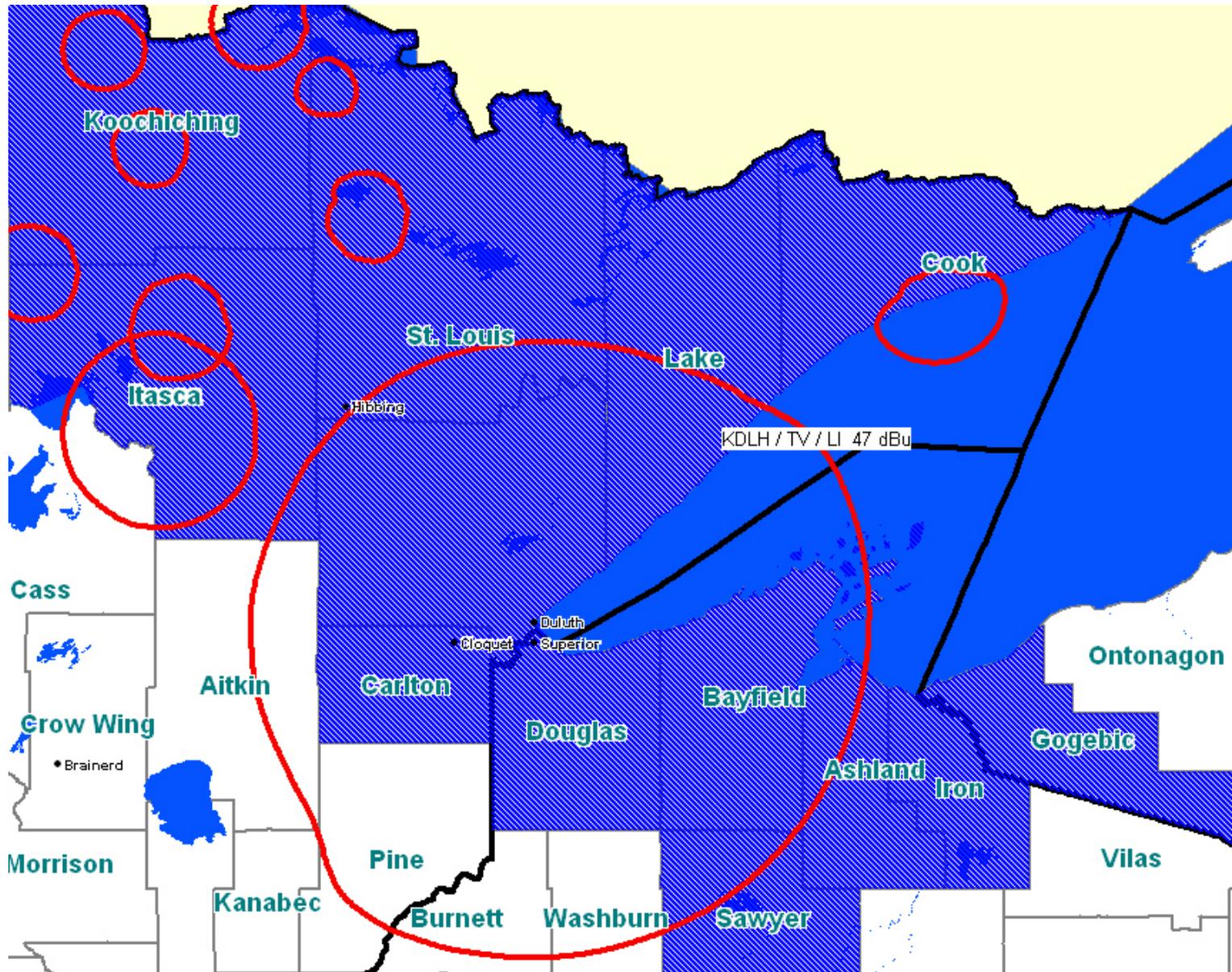
KBJR-TV 74 dBuV/m City Grade

WISCONSIN

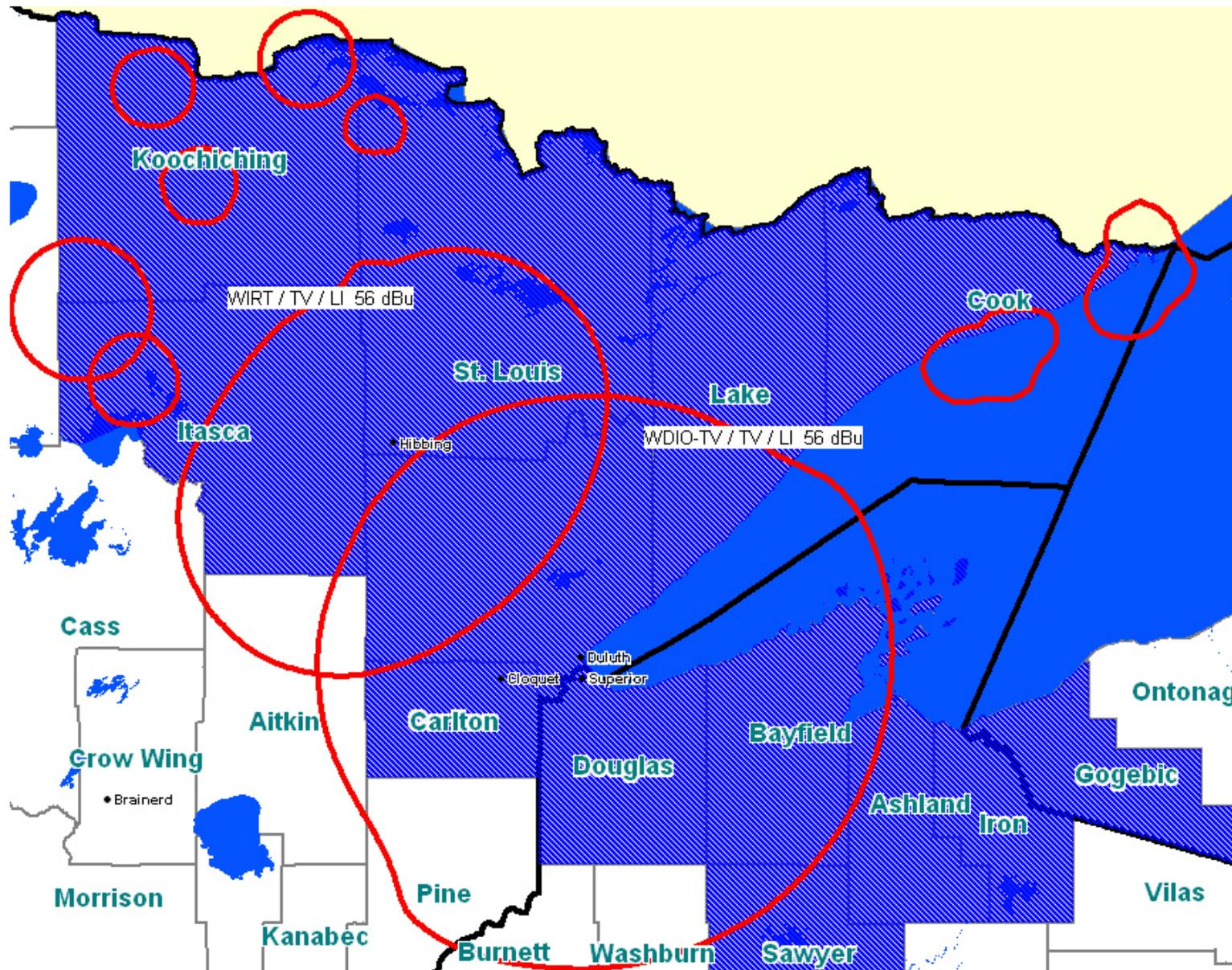


**Appendix 2 – Grade B Contours of Competitive Television Stations in Duluth,
MN-Superior, WI Television Market**

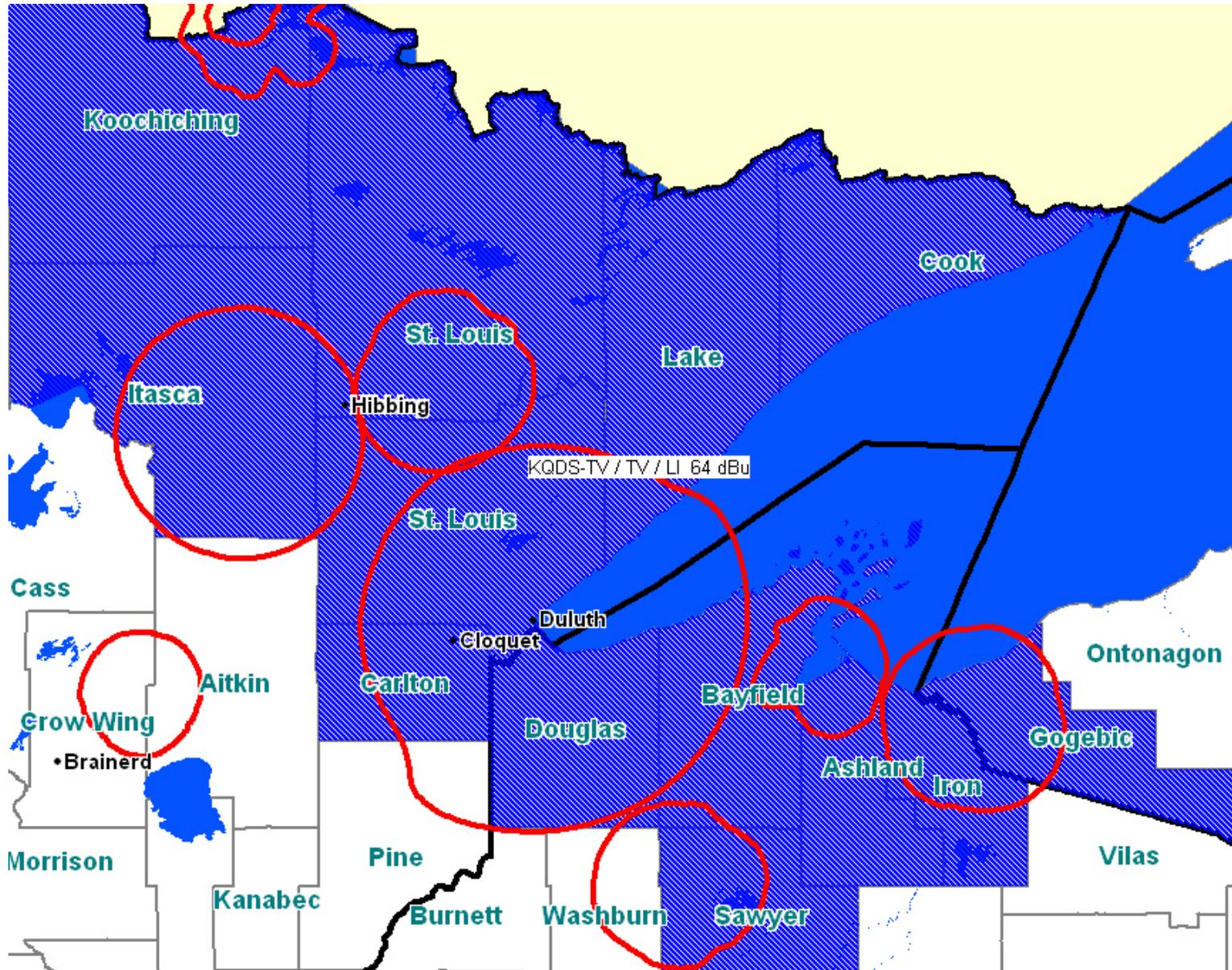
Coverage Patterns of Malara Broadcasting Duluth, MN, Superior, WI Television Properties



Coverage Patterns of Hubbard Broadcasting Duluth, MN, Superior, WI Television Properties



Coverage Patterns of KQDS Acquisition Duluth, MN, Superior, WI Television Properties



**Appendix 3 – Grade B Contours Intersecting with KRII-TV’s Grade B
Contours**

94°W 93°W 92°W 91°W

49°N

49°N

KBJR-TV & KRII(TV)

CANADA
ONTARIO



KRII(TV) 56 dBuV/m Grade B

48°N

48°N

Chisholm

**OVERLAP
AREA**

Lake Superior

47°N

47°N

Duluth

Superior

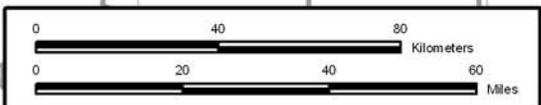
46°N

46°N

MINNESOTA

KBJR-TV 47 dBuV/m Grade B

WISCONSIN



94°W 93°W

92°W

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Qualifications

**QUALIFICATIONS
OF
MARK R. FRATRIK, Ph.D.**

Mark R. Fratrik, Ph.D. is vice president with BIA Financial Network (BIAfn), the premier financial consulting firm specializing in the appraisal and fair market valuation of broadcasting, cable, and telecommunications properties and preparation of bank presentations for communications clients.

As Vice President, Dr. Fratrik is involved in conducting industry studies on the broadcasting and related industries, as well as consulting clients in these industries about their strategic directions. He has also been involved in the estimation of values for assets owned by broadcast stations.

Prior to coming to BIAfn, Dr. Fratrik worked at the National Association of Broadcasters (NAB) for nearly 16 years as vice president/economist. While there, he conducted primary research about the broadcasting and related industries and was responsible for the annual financial and biennial salary and fringe benefits study conducted by the association. He is the author several publications concerning the radio and television industries both from financial and strategic perspectives. He has also spoken at numerous conferences on the status of the broadcasting industries, and their future business prospects.

Before joining NAB in 1985, Dr. Fratrik worked for the Federal Trade Commission in the Bureau of Economics where he spent five years conducting analyses of industry practices to evaluate overall economic impact. Also, Dr. Fratrik has worked closely with broadcasters in determining what opportunities lay in the spectrum as well as exploring regulatory matters concerning the spectrum.

Dr. Fratrik received his Ph.D. and MA in Economics from Texas A& M University, and BA in Economics (Honors) and Mathematics from State University of New York. He is the author of several articles in academic and business trade journals.