

**EXHIBIT 20: DEMONSTRATION OF COMPLIANCE WITH LOCAL TELEVISION
MULTIPLE OWNERSHIP RULE**

A. Introduction

This application seeks the FCC's consent to the transfer of control of TTBG/KTNC License Sub, LLC, licensee of digital commercial television station KTNC-TV (Fac. ID 21533), Concord, CA, from TTBG, LLC ("Transferor") to NRJ TV SF OpCo, LLC ("NRJ TV SF" or "Transferee"). The community of license of KTNC-TV is located in the San Francisco–Oakland–San Jose, CA designated market area ("DMA"). This exhibit demonstrates that the proposed transfer of control is consistent with the Commission's local television multiple ownership rule, commonly known as the TV duopoly rule.

The TV duopoly rule permits having attributable interests in two television stations in the same DMA if the following two-part test is satisfied: (1) at least one of the stations is not ranked among the top four stations in the DMA, based on the most recent all day (9 a.m.–midnight) audience share, at the time an application is filed proposing an assignment of license or transfer application that would give rise to the attributable interests in the two television stations; and (2) there will remain at least eight independently-owned full-power television stations (commercial and noncommercial) in the DMA following the proposed transaction.¹

The TV duopoly rule is implicated in this case because of common attributable interests in KTNC-TV and KCNS (Fac. ID 71568), San Francisco, CA, which, like KTNC-TV, is in the San Francisco–Oakland–San Jose DMA. A showing was made roughly two years ago that having common attributable interests in these two stations is consistent with the duopoly rule's top four/eight voices test. The showing was made in an application² seeking to assign the license for KCNS to NRJ TV San Fran License Co, LLC (the "KCNS Licensee"), which is controlled in common with the Transferee in this

¹ 47 C.F.R. § 73.3555(b).

² See FCC File No. BALCDT - 20110131AOD.

application. The showing was made because several persons with interests in TTBG/KTNC License Sub, LLC, which is the licensee of KTNC-TV,³ also have indirect ownership interests in the KCNS Licensee.⁴ The Commission granted the KCNS assignment of license application in March 2011.⁵

If the transfer of control that is proposed in this application is consummated, the persons identified in the preceding paragraph will continue to have interests in both KCNS and KTNC-TV. Their interests in KCNS will not change. Their interests in KTNC-TV, instead of being through the licensee of that station at present, TTBG/KTNC License Sub, LLC, will be through the proposed transferee, NRJ TV SF.⁶ In addition, if the transfer of control that is proposed in this application is consummated, the other owners of NRJ TV SF's parent company, NRJ TV IV LLC, also will have interests in both KTNC-TV and KCNS. Given these circumstances, NRJ TV SF is updating the top four/eight voices test that was made in 2011 to demonstrate that having attributable interests in both KTNC-TV and KCNS continues to be consistent with the TV duopoly rule.

³ The indirect parent company of TTBG/KTNC License Sub, LLC is TTBG, LLC. J. Daniel Sullivan, U. Bertram Ellis, Jr., David Pulido, James V. Sandry, and Janet Schoff are officers of TTBG LLC. J. Daniel Sullivan is a non-voting member and chairman, and W. Lawrence Patrick is a voting member, of the board of managers of TTBG LLC.

⁴ The KCNS Licensee is wholly owned indirectly by NRJ TV LLC. J. Daniel Sullivan, U. Bertram Ellis, Jr., David Pulido, Janet Schoff, and James V. Sandry are the members of Titan Broadcast Management, LLC, which wholly owns 5 Star Spectrum, LLC, which is a member of NRJ TV LLC. W. Lawrence Patrick and his wife Susan Patrick are the members of Drumcree, LLC, which also is a member of NRJ TV LLC.

⁵ See Report No. 47450 (March 24, 2011).

⁶ NRJ TV SF is wholly owned by NRJ TV IV LLC. J. Daniel Sullivan, U. Bertram Ellis, Jr., David Pulido, Janet Schoff, and James V. Sandry are the members of Titan Broadcast Management, LLC, which wholly owns 5 Star Spectrum, LLC, which is a member of NRJ TV IV LLC. W. Lawrence Patrick and his wife Susan Patrick are the members of Drumcree, LLC, which also is a member of NRJ TV IV LLC.

B. The Proposed Transaction Satisfies the Top Four /Eight Voices Test of Section 73.3555(b).

Neither KCNS nor KTNC-TV is affiliated with one of the major television networks. KCNS carries MundoFox on its primary channel. KTNC-TV carries Estrella TV on its primary channel.

Neither KCNS nor KTNC-TV was ranked among the top four stations in the San Francisco–Oakland–San Jose, CA DMA in the most recent all day (9 a.m.–midnight) audience share tabulation. Accordingly, the first part of the top four /eight voices test is satisfied.

Attachment 1 of this Exhibit demonstrates compliance with the second part of the test, *i.e.*, it shows there will be eight or more independently-owned full-power TV stations in the San Francisco–Oakland–San Jose, CA DMA following consummation of the proposed assignment of license. Under Section 73.3555(b), only TV stations that have service contour overlap with KCNS or KTNC-TV may be counted for purposes of the “eight voices” part of the test. Attachment 1A shows that 22 of the 23 full-power TV stations in the San Francisco–Oakland–San Jose, CA DMA, including KCNS and KTNC-TV, have overlapping service contours. Attachment 1B shows that 16 of these 22 stations with overlapping service contours, which is well above the minimum of eight, will remain independently-owned after control of the licensee holding the authorization for KTNC-TV is transferred to NRJ TV SF OpCo, LLC.

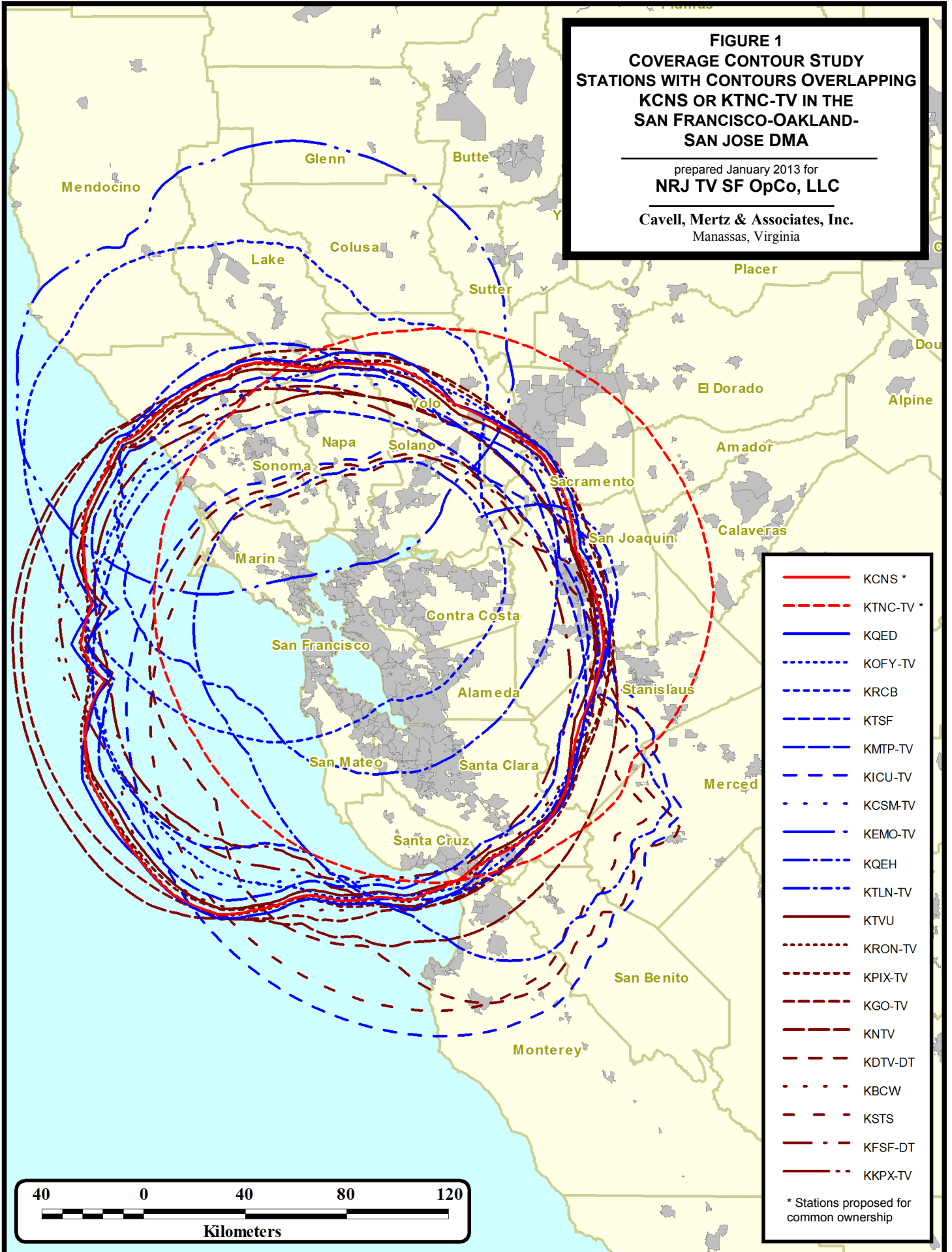
Accordingly, both parts of the two-part test are satisfied, and the proposed transfer of control complies with the local television multiple ownership rule.

ATTACHMENT 1A: TV Station Contours

FIGURE 1
COVERAGE CONTOUR STUDY
STATIONS WITH CONTOURS OVERLAPPING
KCNS OR KTNC-TV IN THE
SAN FRANCISCO-OAKLAND-
SAN JOSE DMA

prepared January 2013 for
NRJ TV SF OpCo, LLC

Cavell, Mertz & Associates, Inc.
 Manassas, Virginia



**ATTACHMENT 1B: Full-Power, Operational TV Stations in
San Francisco–Oakland–San Jose, CA Designated Market Area**

According to information available in the *Television and Cable Factbook* and the Commission’s CDBS database, and as summarized below, there are sixteen (16) independently-owned full-power commercial and noncommercial television stations in the San Francisco–Oakland–San Jose, CA DMA.

<u>Voice Count</u>	<u>Station</u>	<u>Channel (Network)</u>	<u>Community of License</u>	<u>Licensee (Ultimate Owner)</u>
1	KBCW(DT)	45 (CW)	San Francisco, CA	San Francisco Television Station KBCW Inc. (CBS Corporation)
	KPIX-TV	29 (CBS)	San Francisco, CA	CBS Broadcasting Inc. (CBS Corporation)
2	KDTV-DT	51 (UNV)	San Francisco, CA	KDTV License Partnership, G.P. (Univision Corporation)
	KFSF-DT	34 (TEL)	Vallejo, CA	Telefutura San Francisco LLC (Univision Corporation)
3	KEMO-TV	32 (Azteca America)	Santa Rosa, CA	High Plains Broadcasting License Company LLC
4	KGO-TV	7 (ABC)	San Francisco, CA	KGO Television, Inc. (Disney Enterprises, Inc.)
5	KICU-TV	36 (IND)	San Jose, CA	KTVU Partnership (Cox Enterprises)
	KTVU(DT)	44 (FOX)	Oakland, CA	KTVU Partnership (Cox Enterprises)
6	KKPX-TV	41 (ION)	San Jose, CA	ION Media San Jose License, Inc.
7	KNTV(DT)	12 (NBC)	San Jose, CA	NBC Telemundo License Co. (NBC Universal)
	KSTS(DT)	49 (TMO)	San Jose, CA	NBC Telemundo License Co. (NBC Universal)
8	KOFY-DT	19 (IND)	San Francisco, CA	KBWB License, Inc. (Granite Broadcasting Group)
9	KRON-TV	38 (MNT)	San Francisco, CA	Young Broadcasting of San Francisco (Young Broadcasting Group, Inc.)
10	KTLN-DT	47 (TLN)	Novato, CA	Christian Communications Chicagoland
11	KTSF(DT)	27 (IND)	San Francisco, CA	Lincoln Broadcasting Company

12	KCNS(DT) [□]	39 (MundoFox)	San Francisco, CA	NRJ TV San Fran License Co, LLC
	KTNC-TV [□]	14 (Estrella)	Concord, CA	TTBG/KTNC License Sub, LLC
—	KQSL ⁷	8 (FilmOn)	Fort Bragg, CA	Jeff Chang
13	KMTP-TV*	33 (ETV)	San Francisco, CA	Minority Television Project Inc.
14	KQED(DT)*	30 (ETV)	San Francisco, CA	Northern California Public Broadcasting, Inc.
	KQEH(DT)*	50 (ETV)	San Jose, CA	Northern California Public Broadcasting, Inc.
15	KRCB(DT)*	23 (ETV)	Cotati, CA	Rural California Broadcasting Corp.
16	KCSM-TV*	43 (ETV)	San Mateo, CA	San Mateo County Community College District

LEGEND:

* Noncommercial Educational Television Station

□ Stations Proposed for Common Ownership

⁷ Station not counted in the analysis of voices as it has no service contour overlap with KCNS(DT) or KTNC-TV.