

Oklahoma Land Company, LLC
KUOK(TV), , Oklahoma
FCC Form 314
Response to Section II, Question 6
Exhibit 15
May 2009

Exhibit 15

Compliance with Multiple Ownership Rule

Oklahoma Land Company, LLC (“Oklahoma Land”) hereby submits this exhibit demonstrating that the acquisition proposed in the underlying application complies with the FCC’s multiple ownership rule. In the instant application, Oklahoma Land proposes to acquire full power television station KUOK(TV), Woodward, Oklahoma and several lower power stations.¹

After the proposed acquisition, Oklahoma Land and its commonly-owned affiliates, Tyler Broadcasting Corporation and Nick Radio LLC (the “Affiliates”), will own two television stations in the Oklahoma City DMA (KTUZ-TV, Shawnee, OK and KUOK(TV)) and five radio stations (KKNG-FM, Newcastle, OK; KOJK-FM, Blanchard, OK; KTUZ-FM, Oklarche, OK; KOCY-AM; Del City, OK; and KTLR-AM, Oklahoma City).

1) Local Television Multiple Ownership Rule: Oklahoma Land’s proposed acquisition of KUOK(TV) complies with the FCC’s local television ownership rule because the contours of KUOK and KTUZ-TV do not overlap even though both stations have been assigned to the Oklahoma City DMA. *See* 47 C.F.R. § 73.3555(b)(1).

¹ The lower power stations are: KCHM-CA, Oklahoma City, OK; KOKT-LP, Sulphur, OK; and KUTU-LP, Tulsa, OK. Since these stations are not covered by the Commission’s multiple ownership rule, Oklahoma Land is free to acquire them with no further showing.

2) Radio-Television Cross-Ownership Rule: As demonstrated in the attached tables, following the proposed acquisition of KUOK(TV) by Oklahoma Land, there will be well over 20 independently-owned media voices in the Oklahoma City market. For this reason, the combined holdings of two television stations and five radio stations by Oklahoma Land and the Affiliates complies with the FCC's radio-television cross-ownership rule. *See* 47 C.F.R. § 73.3555(c)(2)(i).

Television Stations in the Oklahoma City DMA*

Voice	Call Sign	City of License	State	Parent
1	KAUT-TV	OKLAHOMA CITY	OK	LOCAL TV HOLDINGS
1	KFOR-TV	OKLAHOMA CITY	OK	LOCAL TV HOLDINGS
2	KOCB	OKLAHOMA CITY	OK	SINCLAIR BROADCAST GROUP
2	KOKH-TV	OKLAHOMA CITY	OK	SINCLAIR BROADCAST GROUP
3	KOCM	NORMAN	OK	WORD OF GOD FELLOWSHIP
4	KOCO-TV	OKLAHOMA CITY	OK	HEARST-ARGYLE TELEVISION GROUP
5	KOPX	OKLAHOMA CITY	OK	ION MEDIA NETWORKS
6	KSBI	OKLAHOMA CITY	OK	FAMILY BROADCASTING GROUP
7	KTBO-TV	OKLAHOMA CITY	OK	TRINITY BROADCASTING NETWORK
8	KWTV	OKLAHOMA CITY	OK	GRIFFIN COMMUNICATIONS, LLC
9	KUOK	WOODWARD	OK	EQUITY MEDIA
9	KTUZ-TV	SHAWNEE	OK	OKLAHOMA LAND COMPANY
10	KETA	OKLAHOMA CITY	OK	OKLAHOMA EDUCATIONAL TELEVISION AUTHORITY
10	KWET	CHEYENNE	OK	OKLAHOMA EDUCATIONAL TELEVISION AUTHORITY

*Source: Television and Cable Factbook 2009

English Language Newspaper with a Circulation of 5% in the Oklahoma City DMA:

The Oklahoman, owned by The Oklahoma Publishing Company, is published in Oklahoma City, Oklahoma.

Cable System in the Oklahoma City DMA:

Cox Communications, Oklahoma County, Oklahoma City, Oklahoma

Radio Stations Counted in the Oklahoma City Metro **

Voice	Call Sign	AM/FM	City of License	State	Parent
1	KATT	FM	OKLAHOMA CITY	OK	CITADEL COMMUNICATIONS
1	KKWD	FM	BETHANY	OK	CITADEL COMMUNICATIONS
1	KYIS	FM	OKLAHOMA CITY	OK	CITADEL COMMUNICATIONS
1	WWLS	FM	THE VILLAGE	OK	CITADEL COMMUNICATIONS
1	WKY-AM	AM	OKLAHOMA CITY	OK	CITADEL COMMUNICATIONS
1	WWLS	AM	MOORE	OK	CITADEL COMMUNICATIONS
2	KHBZ	FM	OKLAHOMA CITY	OK	CLEAR CHANNEL COMMUNICATIONS
2	KJYO	FM	OKLAHOMA CITY	OK	CLEAR CHANNEL COMMUNICATIONS
2	KTST	FM	OKLAHOMA CITY	OK	CLEAR CHANNEL COMMUNICATIONS
2	KXXY	FM	OKLAHOMA CITY	OK	CLEAR CHANNEL COMMUNICATIONS
2	KEBC	AM	MIDWEST CITY	OK	CLEAR CHANNEL COMMUNICATIONS
2	KTOK	AM	OKLAHOMA CITY	OK	CLEAR CHANNEL COMMUNICATIONS
3	KKNG	FM	NEWCASTLE	OK	TYLER MEDIA CORP.*
3	KOJK	FM	BLANCHARD	OK	TYLER MEDIA CORP.*
3	KTUZ-FM	FM	OKARCHE	OK	TYLER MEDIA CORP.*
3	KOCY	AM	DEL CITY	OK	TYLER MEDIA CORP.*
3	KTLR	AM	OKLAHOMA CITY	OK	TYLER MEDIA CORP.*

*Applicant owns TV station in this market

** Source: BIA Radio Yearbook 2009

Radio Stations Counted in the Oklahoma City Metro**

4	KIRC	FM	SEMINOLE	OK	ONE TEN BROADCAST GROUP
4	KSLE	FM	WEWOKA	OK	ONE TEN BROADCAST GROUP
4	KWSH	AM	WEWOKA	OK	ONE TEN BROADCAST GROUP
5	KMGL	FM	OKLAHOMA CITY	OK	REDA BROADCASTING CORP.
5	KOMA	FM	OKLAHOMA CITY	OK	REDA BROADCASTING CORP.
5	KRXO	FM	OKLAHOMA CITY	OK	REDA BROADCASTING CORP.
5	KOKC	AM	OKLAHOMA CITY	OK	REDA BROADCASTING CORP.
6	KQCV-FM	FM	SHAWNEE	OK	BOTT RADIO NETWORK
6	KQCV	AM	OKLAHOMA CITY	OK	BOTT RADIO NETWORK
7	KVSP	FM	ANADARKO	OK	PERRY BROADCASTING CO., INC.
7	KRMP	AM	OKLAHOMA CITY	OK	PERRY BROADCASTING CO., INC.
8	KOCD	FM	OKEMAH	OK	KESC ENTERPRISES
9	KQOB	FM	ENID	OK	CHISHOLM TRAIL BROADCASTING
10	KWCO	FM	CHICKASHA	OK	KENNY COMMUNICATIONS
11	KGFF	AM	SHAWNEE	OK	CITIZEN POTAWATOMI
12	KMFS	AM	GUTHRIE	OK	FAMILY WORSHIP CENTER
13	KREF	AM	NORMAN	OK	FAMILY WORSHIP CENTER
14	KTLV	AM	MIDWEST CITY	OK	FIRST CHOICE BROADCASTING
15	KZUE	AM	EL RENO	OK	LA TREMENDA RADIO MX

** Source: BIA Radio Yearbook 2009