

**Amendment to Application for Transfer of Control**  
**Wyomedia Corporation**  
**FCC Form 315, Section IV, Item 8(b)**  
**Exhibit 19**

**REQUEST FOR WAIVER**  
**OF MAIN STUDIO RULE**

As part of the long-form application by which Wyomedia Corporation (“Wyomedia”) sought consent to acquire the licenses of KFNE(TV), Riverton, WY and KFNR(TV), Rawlins, WY (the “Stations”), Wyomedia requested a waiver of the “main studio” rule, Section 73.1125(a) of the Commission’s rules, to maintain the Stations’ main studio at the main studio of Wyomedia’s station KFNB(TV), Casper, WY. By letter dated February 10, 2009, the Deputy Chief, Video Division of the Commission’s Media Bureau granted that waiver request (the “Staff Letter”). Wyomedia has been operating a combined main studio pursuant to the terms of the Staff Letter since that date. As part of this application for consent to the transfer of control of Wyomedia from Marvin Gussman (deceased) to his surviving spouse, Wyomedia hereby requests a new waiver of the main studio rule. In support thereof, Wyomedia states as follows:

(1) KFNE and KFNR rebroadcast the programming of KFNB. This arrangement has been in place for many years and is suitable for the rural audiences served by the Stations. None of the three stations’ analog Grade B contours overlap one another.<sup>1</sup>

(2) Census 2000 reports that the population of Rawlins is 8,538 and the population of Riverton is 9,310. Census 2000 also reports that the median household income in Riverton is \$31,531 and \$36,600 in Rawlins. In contrast, Census 2000 reports that the national average is \$41,994. Furthermore, according to Census 2000, 15.4 percent of individuals in Riverton and 13.7 percent of individuals in Rawlins are living below the poverty line, compared with 12.4 percent of individuals nationwide.<sup>2</sup> Interim Census data is unavailable for those communities.

(3) The Casper-Riverton DMA has only 55,620 households and currently is ranked 196<sup>th</sup> in the nation.<sup>3</sup>

(4) Although the town of Rawlins is located in the much larger Denver DMA, it is in Carbon County, Wyoming, where only 0.4 percent of the Denver DMA’s television households are located.

---

<sup>1</sup> As indicated on Exhibit A attached hereto, the digital noise-limited contour of KFNB-DT slightly overlaps those of KFNE-DT and KFNR-DT, but there is no overlap between KFNE-DT and KFNR-DT. Based on data from the 2000 Census, there are just 34 persons residing in the area of overlap between KFNB-DT and KFNE-DT, representing 0.05 percent and 0.07 percent of the populations, respectively, residing within those contours. And there are just 10 persons residing in the area of overlap between KFNB-DT and KFNR-DT, representing 0.01 percent and 0.09 percent of the populations, respectively, residing within those contours.

<sup>2</sup> See <http://www.census.gov/Press-Release/www/2001/demoprofile.html>.

<sup>3</sup> See [http://www.tvb.org/rcentral/markettrack/us\\_hh\\_by\\_dma.asp](http://www.tvb.org/rcentral/markettrack/us_hh_by_dma.asp), last visited June 25, 2010.

(5) Neither Rawlins nor Riverton can support a stand-alone station. The fourth quarter 2009 unemployment rate for Carbon County, WY, where Rawlins is located, was 7.4 percent, and the fourth quarter 2009 unemployment rate for Fremont County, WY, where Riverton is located, was 9.1 percent. The overall unemployment rate in the state of Wyoming for that quarter was 7.1 percent.<sup>4</sup>

(6) Since the date of the Staff Letter, Wyomedia has maintained public affairs representatives in both Rawlins and Riverton who have conducted, on a monthly basis, interviews and surveys of local community leaders and other residents to ascertain the interests, concerns and needs of Rawlins and Riverton area viewers. Wyomedia has maintained the public inspection file of KFNE in Riverton, at Riverton Public Library 1300 W. Park Ave. Riverton WY. 82501 and the public inspection file of KFNR in Rawlins, at Rawlins Public Library 215 W. Buffalo St. Rawlins WY. 82301. Viewers may contact the main studio in Casper by calling, toll free, 877-234-6800. The Casper main studio remains accessible to Rawlins and Riverton viewers by a main highway.

Based on the foregoing, grant of this waiver request would serve the public interest, as it would allow Wyomedia to commit its scarce resources towards serving viewers in Casper, Riverton and Rawlins and the surrounding areas with the quality programming to which those viewers have grown accustomed during the period that Wyomedia has operated the stations.

---

<sup>4</sup> See [http://www2.fdic.gov/recon/ovrpt.asp?CPT\\_CODE=E40&ST\\_CODE=56&RPT\\_TYPE=Tables](http://www2.fdic.gov/recon/ovrpt.asp?CPT_CODE=E40&ST_CODE=56&RPT_TYPE=Tables), last visited June 25, 2010. The unemployment rates have soared since the September 2008 rates reported in the Staff Letter, up from 2.8 and 3.5 percent, respectively, in Rawlins and Riverton, and from 2.6 percent in Wyoming as a whole.