

Exhibit 15
Compliance with Multiple Ownership Rules

This exhibit is submitted as an amendment to the instant assignment application to demonstrate that the proposed assignment complies with the Commission's revised multiple ownership rules.¹ As demonstrated below, the acquisition of the channel 35 Vicksburg station subject to the instant assignment application by Mississippi Television, LLC, complies with the Commission's local television ownership rule and the national television ownership rule, as recently amended.

A. Compliance with Revised Local Television Ownership Rule

The revised local television ownership rule permits TV ownership combinations that satisfy a two-part test: a numerical outlet cap and a top four-ranked standard. The numerical outlet cap allows the common ownership of no more than two full-power television stations in Designated Market Areas ("DMAs") with 17 or fewer commercial and noncommercial television stations, and up to three television stations in markets with 18 or more commercial and noncommercial television stations. The top four-ranked standard prohibits combinations which would result in a single entity owning more than one television station that is ranked among the top four stations in the DMA based on audience share. As a result, same-market combinations are not permitted in markets with fewer than five television stations.²

¹ See *In re 2002 Biennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, Report and Order and Notice of Proposed Rulemaking, MB Docket No. 02-277, FCC 03-127, ¶ 186 (rel. July 2, 2003) ("TV Ownership Rules R&O"). The revised multiple ownership rules become effective on September 4, 2003. See 68 Fed. Reg. 48764 (Aug. 14, 2003).

² See *TV Ownership Rules R&O* at ¶ 186; see also 47 C.F.R. 73.3555(b), as amended.

As shown in Table 1 below, there are currently, and were as of the filing date of the instant application, six operational commercial and noncommercial television stations in the Jackson, Mississippi DMA. The channel 35 Vicksburg station that is subject to the instant assignment application is not included in this total, because the station is not yet on the air.

**Table 1: Operational Full-power Television Stations
in the Jackson, Mississippi DMA³**

Station Count	Station (Network Affiliation)	City of License	Licensee (Owner)
1	WAPT (ABC) Fac. No. 49712	Jackson, MS	WAPT Heart-Argyle Television Inc. (Hearst-Argyle Television Inc.)
2	WJTV (CBS) Fac. No. 48667	Jackson, MS	Media General Broadcasting Inc. (Media General Inc.)
3	WLBT (NBC) Fac. No. 68542	Jackson, MS	CivCo Inc. (Cosmos Broadcasting Corp.)
4	WDBD (WB) Fac. No. 71326	Jackson, MS	Jackson Television, L.L.C. ⁴ (D. Wayne Elmore (50%)/Thomas R. Galloway, Sr. (50%)) ⁵
5	WMAU-TV (NCE) Fac. No. 43184	Bude, MS	Mississippi Authority for ETV (N/A)
6	WMPN-TV (NCE) Fac. 43168	Jackson, MS	Mississippi Authority for ETV (N/A)

Moreover, as shown in Table 2 below, there are three additional full-power television stations which currently have construction permits in the Jackson, Mississippi DMA, but are not yet on the air, including the channel 35 Vicksburg station subject to the instant assignment application.

³ Sources: Television & Cable Factbook 2003 and the Media Bureau's Consolidated Database System (CDBS).

⁴ Application for consent to the assignment of license of station WDBD from WDBD License Corp. to Jackson Television, L.L.C. granted on August 11, 2003 (File No. BALCT-20030418ABF).

⁵ Thomas L. Galloway, Sr., is the father of Sheldon H. Galloway, the attributable interest holder in proposed assignee Mississippi Television, LLC. In accordance with the criteria set forth in Worksheet 3-B (Family Relationships) of Form 314, applicant Mississippi Television, LLC certifies that the proposed acquisition of the Vicksburg permit does not present an issue under the Commission's policies relating to media interests of immediate family members.

**Table 2: Non-operational Full-power Television Stations
in the Jackson, Mississippi DMA**

Station Count	Station	City of License	Licensee (Owner)
7	NEW (Ch. 35, Vicksburg, MS) ⁶ Fac. No. 84253	Vicksburg, MS	Mississippi Television, LLC (Proposed assignee in instant application) (Sheldon H. Galloway)
8	WNTZ (CP granted 7/25/2002) ⁷ Fac. No. 16539	Jackson, MS	White Knight Broadcasting of Natchez, Inc. (Sheldon H. Galloway)
9	NEW (Ch. 34) ⁸ Fac. No. 136749	Magee, MS	Roberts Broadcasting USA, LLC (Michael and Steven Roberts)

Sheldon H. Galloway is a member of proposed assignee Mississippi Television, LLC. Mr. Galloway holds 30 percent of the common units and has 100 percent voting control of proposed assignee Mississippi Television, LLC.⁹ Mr. Galloway also is the sole shareholder of White Knight Holdings, Inc., which wholly owns White Knight Broadcasting, Inc., which, in turn, wholly owns through licensee subsidiaries the broadcast stations listed in Exhibit 13 hereto, including station WNTZ, currently licensed in Natchez, Mississippi.

Once the proposed assignment of the Vicksburg permit is granted as proposed herein and the transaction is consummated, and once station WNTZ is relocated to Jackson, Mississippi, as discussed above, Mr. Galloway effectively will have an

⁶ The current permittee of the Vicksburg station has requested call sign WUPX (Call Sign Request No. 29148).

⁷ On July 25, 2002, station WNTZ was granted a construction permit to relocate its analog facilities to Jackson, Mississippi (Permit No. BPCT-20011115AAF). The station also has a pending application to relocate its digital facilities to Jackson (File No. BMPCDT-20011116ABJ).

⁸ The television channel 34 construction permit in Magee, Mississippi was awarded to Roberts Broadcasting USA, LLC in Auction No. 82. *See FCC Announces It Is Prepared to Grant Broadcast Construction Permits After Final Payment Is Made*, Auction No. 82, Public Notice, DA 03-2525 (rel. July 30, 2003). According to the Television & Cable Factbook 2003, this station will be part of the Jackson, Mississippi DMA.

⁹ The other members of Mississippi Television, LLC will be insulated in accordance with the standards set forth in FCC Form 314 Worksheet 3 (Investor insulation and non-party influence over assignee/applicant).

attributable interest in two television stations in the same DMA. However, because there already are six operational commercial and noncommercial television stations in the Jackson DMA, the proposed assignment complies with the numerical outlet cap of the local television ownership rule. The proposed assignment also complies with the top four-ranked standard of the local television ownership rule because neither the Vicksburg station nor station WNTZ are operational in the Jackson DMA and therefore cannot be among the top four-ranked stations in the DMA.

Based on the foregoing, assignee Mississippi Television, LLC certifies that the assignment of the Vicksburg construction permit, as proposed herein, complies with the Commission's local television ownership rule, as amended.

B. Compliance with Revised National Television Ownership Rule

The revised national television ownership rule prohibits any entity from owning television stations that in the aggregate reach more than 45% of the country's television households.¹⁰ Sheldon H. Galloway, the sole attributable interest holder in proposed assignee Mississippi Television, LLC, also has an attributable interest in the four full-power television stations listed in Exhibit 13 hereto. All of these stations serve markets under the top 50 ranked DMAs, and the aggregate reach of these stations in terms of national television households is well below the 45% cap established by the Commission, taking into consideration the reach of the Vicksburg station subject to the instant assignment application.

Accordingly, assignee Mississippi Television, LLC certifies that the assignment of the Vicksburg construction permit, as proposed herein, complies with the Commission's national television ownership rule, as amended.

¹⁰ See *TV Ownership Rules R&O* at ¶ 580; see also 47 C.F.R. 73.3555(d), as amended.