



(REFERENCE COPY - Not for submission)

# Commercial Broadcast Stations Biennial Ownership Report (FCC Form 323)

File Number: **0000103538** | Submit Date: **2020-01-31** | FRN: **0009574518**

Purpose: **Commercial Broadcast Stations Biennial Ownership Report** | Status: **Superceded** | Status Date: **02/05/2020**

Filing Status: **InActive**

Section I - General Information

1. Respondent

FRN		Entity Name			
0025975442		BCH WHC Spokane LLC			

Street Address	City (and Country if non U.S. address)	State ("NA" if non-U.S. address)	Zip Code	Phone	Email
Cowles Company 999 West Riverside Ave.	Spokane	WA	99201	+1 (509) 459-5220	staceyc@spokesman.com

2. Contact Representative

Name		Organization			
David H. Pawlik		attorney at law			

Street Address	City (and Country if non U.S. address)	State	Zip Code	Phone	Email
1513 Defoe Street	Rockville	MD	20850	+1 (301) 340-3329	Dave@dhpawlik.com

3. Application Filing Fee

Not Applicable

4. Nature of Respondent

(a) Provide the following information about the Respondent:	
Relationship to stations/permits	Entity required to file a Form 323 because it holds an attributable interest in one or more Licensees
Nature of Respondent	Limited liability company

(b) Provide the following information about this report:	
Purpose	Biennial
"As of" date	10/01/2019  When filing a biennial ownership report or validating and resubmitting a prior biennial ownership report, this date must be Oct. 1 of the year in which this report is filed.

5. Licensee(s)  
and Station(s)

Respondent is filing this report to cover the following Licensee(s) and station(s):

Licensee/Permittee Name	FRN
Cowles Montana Media Company	0023011828

Fac. ID No.	Call Sign	City	State	Service
14674	KWYB	BUTTE	MT	DTV
14675	KTMF	MISSOULA	MT	DTV
14676	KTMF-LD	KALISPELL	MT	LPD
34412	KFBB-TV	GREAT FALLS	MT	DTV
34413	KHBB-LD	HELENA	MT	LPD
34415	K36PB-D	LEWISTOWN	MT	LPT
35724	KULR-TV	BILLINGS	MT	DTV
35726	K06FE-D	MILES CITY	MT	LPT
38576	KWYB-LD	BOZEMAN	MT	LPD
51605	K09SF	NORTH FORK, ETC.	WY	LPX
51629	K17KC-D	MEETEETSE	WY	LPT
51631	K25OV-D	CODY	WY	LPT
129406	K24FL-D	COLUMBUS	MT	LPT
181721	K26ON-D	DEER LODGE, ETC.	MT	LPT
187420	K31PD-D	WHITEFISH, ETC.	MT	LPT
187940	K20KQ-D	LIVINGSTON, ETC.	MT	LPT

Licensee/Permittee Name	FRN
KHQ, Incorporated	0001582816

Fac. ID No.	Call Sign	City	State	Service
12395	KNDO	YAKIMA	WA	DTV
12427	KNDU	RICHLAND	WA	DTV
34536	K18DT-D	COEUR D'ALENE	ID	LD
34537	KHQ-TV	SPOKANE	WA	DTV
50530	K35BW-D	LEWISTON	ID	LD

Section II – Biennial Ownership Information

1. 47 C.F.R.  
Section 73.3613  
and Other  
Documents

Licensee Respondents that hold authorizations for one or more full power television, AM, and/or FM stations should list all contracts and other instruments set forth in 47 C.F.R. Section 73.3613(a) through (c) for the facility or facilities listed on this report. In addition, attributable Local Marketing Agreements (LMAs) and attributable Joint Sales Agreements (JSAs) must be disclosed by the licensee of the brokering station on its ownership report. If the agreement is an attributable LMA, an attributable JSA, or a network affiliation agreement, check the appropriate box. Otherwise, select "Other." Non-Licensee Respondents, as well as Licensee Respondents that only hold authorizations for Class A television and/or low power television

stations, should select “Not Applicable” in response to this question.

Not Applicable.

2. Ownership Interests

(a) Ownership Interests. This Question requires Respondents to enter detailed information about ownership interests by generating a series of subforms. Answer each question on each subform. The first subform listing should be for the Respondent itself. If the Respondent is not a natural person, also list each of the officers, directors, stockholders, non-insulated partners, non-insulated members, and any other persons or entities with a direct attributable interest in the Respondent pursuant to the standards set forth in 47 C.F.R. Section 73.3555. (A “direct” interest is one that is not held through any intervening companies or entities.) List each interest holder with a direct attributable interest in the Respondent separately.

Leave the percentage of total assets (Equity Debt Plus) field blank for an interest holder unless that interest holder has an attributable interest in the Respondent solely on the basis of the Commission’s Equity Debt Plus attribution standard, 47 C.F.R. Section 73.3555, Note 2(i).

In the case of vertical or indirect ownership structures, list only those interests in the Respondent that also represent an attributable interest in the Licensee(s) for which the report is being submitted.

Entities that are part of an organizational structure that includes holding companies or other forms of indirect ownership must file separate ownership reports. In such a structure do not report, or file a separate report for, any interest holder that does not have an attributable interest in the Licensee(s) for which the report is being submitted.

Please see the Instructions for further detail concerning interests that must be reported in response to this question.

The Respondent must provide an FCC Registration Number for each interest holder reported in response to this question. Please see the Instructions for detailed information and guidance concerning this requirement.

Ownership Information			
FRN	0025975442		
Entity Name	BCH WHC Spokane LLC		
Address	PO Box		
	Street 1	Cowles Company	
	Street 2	999 West Riverside Ave.	
	City	Spokane	
	State ("NA" if non-U.S. address)	WA	
	Zip/Postal Code	99201	
	Country (if non-U.S. address)	United States	
Listing Type	Respondent		
Positional Interests (check all that apply)	Respondent		
Tribal Nation or Tribal Entity	Interest holder is not a Tribal nation or Tribal entity		
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	0.0%	Jointly Held? No
	Equity	0.0%	
	Total assets (Equity Debt Plus)	0.0%	
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

Ownership Information	

FRN	0020028700		
Name	William S. Cowles		
Address	PO Box		
	Street 1	999 West Riverside Avenue	
	Street 2		
	City	Spokane	
	State ("NA" if non-U.S. address)	WA	
	Zip/Postal Code	99201	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Other - Manager, Family Trust Trustee		
Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)	Citizenship	US	
	Gender	Male	
	Ethnicity	Not Hispanic or Latino	
	Race	White	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	50.0%	Jointly Held? Yes
	Equity	0.0%	
	Total assets (Equity Debt Plus)		
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

Ownership Information			
FRN	0020028833		
Name	James L. Cowles		
Address	PO Box		
	Street 1	999 West Riverside Avenue	
	Street 2		
	City	Spokane	
	State ("NA" if non-U.S. address)	WA	
	Zip/Postal Code	99201	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Other - Family Trust Trustee		

Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)	Citizenship	US	
	Gender	Male	
	Ethnicity	Not Hispanic or Latino	
	Race	White	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	50.0%	Jointly Held? Yes
	Equity	0.0%	
	Total assets (Equity Debt Plus)		
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

(b) Respondent certifies that any interests, including equity, financial, or voting interests, not reported in this filing are non-attributable. If "No," submit as an exhibit an explanation.	Yes
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<p>(c) Does the Respondent or any reported interest holder hold an attributable interest in any newspaper entities in the same market as any station for which this report is filed, as defined in 47 C.F.R. Section 73.3555?</p> <p>If "Yes," provide information describing the interest(s), using EITHER the subform OR the spreadsheet option below. Respondents with a large number (50 or more) of entries to submit should use the spreadsheet option.</p> <p>NOTE: Spreadsheets must be submitted in a special XML Spreadsheet format with the appropriate structure that is specified in the documentation. For instructions on how to use the spreadsheet option to complete this question (including templates to start with), please Click Here.</p> <p>If using the subform, leave the percentage of total assets (Equity Debt Plus) field blank for an interest holder unless that interest holder has an attributable interest in the newspaper entity solely on the basis of the Commission's Equity Debt Plus attribution standard, 47 C.F.R. Section 73.3555, Note 2(i). If using an XML Spreadsheet, enter "NA" into the percentage of total assets (Equity Debt Plus) field for an interest holder unless that interest holder has an attributable interest in the newspaper entity solely on the basis of the Commission's Equity Debt Plus attribution standard.</p> <p>The Respondent must provide an FCC Registration Number for each interest holder reported in response to this question. Please see the Instructions for detailed information and guidance concerning this requirement.</p>	Yes
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Other Newspaper Interests		
FRN	0020028833	
Name	James L. Cowles	
Name of Newspaper	The Spokesman-Review	

Location of Newspaper	City	Spokane
	State	WA
Positional Interests (check all that apply)	Other - Family Trust Trustee	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	18.4%
	Equity	0.0%
	Total assets (Equity Debt Plus)	

Other Newspaper Interests		
FRN	0020028700	
Name	William S. Cowles	
Name of Newspaper	The Spokesman-Review	
Location of Newspaper	City	Spokane
	State	WA
Positional Interests (check all that apply)	Officer, Director, Other - Family Trust Trustee	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	46.9%
	Equity	0.0%
	Total assets (Equity Debt Plus)	

<p><b>(d) Are any of the individuals listed as an attributable interest holder in the Respondent married to each other or related to each other as parentchild or as siblings?</b></p> <p>If "<u>Yes</u>," provide the following information for each such the relationship.</p>	No
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<p><b>(e) Is Respondent seeking an attribution exemption for any officer or director with duties wholly unrelated to the Licensee(s)?</b></p> <p>If "<u>Yes</u>," complete the information in the required fields and submit an Exhibit fully describing that individual's duties and responsibilities, and explaining why that individual should not be attributed an interest.</p>	No
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Certification

Section	Question	Response
Authorized Party to Sign	WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND /OR REVOCATION OF ANY STATION LICENSE --OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).	
Certification	I certify that I have examined this report and that to the best of my knowledge and	Official Title: <b>Manager</b>

	belief, all statements in this report are true, correct and complete.	Exact Legal Title or Name of Respondent: <b>BCH WHC Spokane LLC</b> Name: <b>William Stacey Cowles</b> Phone: <b>5094595220</b>  01/31/2020
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