

## **INTRODUCTION**

By this application, UNW Media Holdings LLC (“Assignor”) and Crawford County Broadcasting Corp. (“Assignee”) request Commission consent to the assignment of non-common carrier earth station licenses E181143.

## **DESCRIPTION OF THE TRANSACTION**

Assignor has been the owner and operator of Stations KDSN and KDSN-FM, Denison, Iowa (the “Stations”), pursuant to licenses issued by the Commission.

Pursuant to an Asset Purchase Agreement, dated August 14, 2018, between Assignor and Assignee, Assignee has acquired, pursuant to Commission consent in File Nos. BAL-20180904AAL and BALH-20180904AAM, the assets (including the FCC licensees) for the Stations.<sup>1</sup> Thus, in accordance with the terms of the understandings reached by Assignor and Assignee, ownership and control of the Stations has transferred from Assignor to Assignee and the parties now seek to transfer the newly awarded license for Station E181143 to be assigned as well.

## **THE TRANSACTION WILL SERVE THE PUBLIC INTEREST**

Consummation of this transaction will serve the public interest. Under well-established precedent, the Commission evaluates both potential public interest harms from the proposed transaction, as well as public interest benefits.<sup>2</sup> In this case, there are no public interest harms or

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<sup>1</sup> The assignment applications were consented to on October 19, 2018 and public notice of that consent was provided shortly thereafter. *Public Notice*, Report No. 49348, released October 24, 2018. The assignments were consummated on November 15, 2018.

<sup>2</sup> *See, e.g., Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEOP PAS, LLC, Transferors and Intelsat Holdings, Ltd., Transferee, Consolidated Application for Authority to Transfer Control of PanAmSat Licensee Corp. and*

reductions in competition associated with this transaction. To the contrary, Assignee and Assignor both have and will serve the public interest through the radio station licensees in Denison, Iowa and do not compete with each other, either in the past or in the future.. As the Commission has recognized with respect to such services, “satellite communication services are substantially differentiated one from another in terms of frequency band, transponder power, and the geographic coverage of antennas.”<sup>3</sup> Thus, the transaction will not result in anti-competitive market concentration.

To the contrary, as discussed herein, the transaction will maintain radio station service to the public in Denison, as the Assignee is well qualified to do so. That service is only enhanced by being able to access satellite-delivered program and information services.

Assignee, through its local roots and its owners’ ownership and control of other radio stations in the state of Iowa, is highly qualified to operate the subject earth stations. Considering the Commission’s consent to the assignment of the radio station licenses, from Assignor to Assignee, there is evidence of Assignee’s ability to serve as a licensee of Commission issued authorizations and operate in furtherance of the public interest and convenience. Accordingly, based on the foregoing, the proposed assignment of license will serve the public interest and should be granted forthwith.

4846-5637-1074

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*PanAmSat H-2 Licensee Corp.*, IB Docket No. 05-290, Memorandum Opinion and Order, FCC 06-85, 21 FCC Rcd 7368 (2006) (“*PanAmSat/Intelsat*”), at ¶ 17.

<sup>3</sup> *PanAmSat/Intelsat* at ¶ 29.