



WASHINGTON, DC

DENNIS P. CORBETT
202.416.6780
DCORBETT@LERMANSENTER.COM

June 23, 2010

VIA HAND DELIVERY & EMAIL

Ms. P. Michele Ellison
Chief, Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: File No. EB-10-IH-0188; Consolidated Petition for Expedited Stay

Dear Ms. Ellison:

On behalf of 202 television broadcast stations affiliated with the Fox Television Network, I am transmitting herewith an original and four copies of a Consolidated Petition for Expedited Stay in the above-referenced proceeding.

Sincerely,

A handwritten signature in black ink that reads 'Dennis P. Corbett'. The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Dennis P. Corbett

DPC/rjc
Attachment

cc (via email): FCC Chairman, all FCC Commissioners and their legal (media) advisors
Mr. William Davenport
Ms. Hillary DeNigro
Ms. Judy Lancaster

**Before the
Federal Communications Commission
Washington, DC 20554**

In re:)
)
June 3, 2010 Letters of Inquiry to)
Licensees of Stations Affiliated) File No. EB-10-IH-0188
with the Fox Television Network Concerning)
the Broadcast of the Program)
"American Dad" on January 3, 2010)

To: Chief, Enforcement Bureau
Federal Communications Commission

CONSOLIDATED PETITION FOR EXPEDITED STAY

The licensees of the 202 television broadcast stations listed in the Attachment hereto ("Licensees") hereby collectively petition the Chief of the Enforcement Bureau ("Bureau") of the Federal Communications Commission ("FCC" or "Commission") for an expedited stay of the requirement that Licensees respond to the above-captioned, substantively identical June 3, 2010 letters of inquiry sent by the Bureau to Licensees inquiring about the January 3, 2010 episode of the Fox Television Network ("FTN") program "American Dad" ("American Dad Episode"). In support whereof, the following is shown.¹

FACTUAL BACKGROUND

On June 3, 2010, the Bureau released a Notice of Apparent Liability (the "NAL") proposing to impose a forfeiture of \$25,000 on Fox Television Stations, Inc. ("FTS") for what the NAL characterized as FTS's failure to respond to several of the Bureau's directives contained

¹ All Licensees except FTN affiliates owned and operated by Fox Television Holdings, Inc. ("FTH") have authorized undersigned counsel from Lerman Senter PLLC to submit this consolidated Petition on their behalf. Counsel for Licensees of FTH-owned and operated stations are separately signing this Petition.

in a January 21, 2010 Letter of Inquiry directed to FTS by the Bureau (the “FTS LOI”).² The FTS LOI had posed a series of questions about the American Dad Episode. In response, NW Communications of Texas, Inc. (“NW”), licensee of the Fox-owned and operated FTN affiliate in the Dallas, Texas market (“KDFW”) and the subject of the only complaint attached to the FTS LOI, demurred concerning, inter alia, questions seeking disclosure of all FTN affiliates that had carried the American Dad Episode.³ In so doing, NW relied upon “Commission precedent requir[ing] the agency to provide licensees with all ‘properly documented complaints’ before it may inquire about allegedly indecent broadcasts.”⁴ In the NAL, the Bureau found FTS apparently liable for forfeiture after determining both that NW’s explanations were insufficient and that an otherwise unmet obligation to respond to an FCC order remained in place. The Bureau adjusted the base fine upwards, from \$4,000 to \$25,000, on the basis of FTS’s size and ability to pay, as well as what the Bureau concluded was the egregious nature of the offense.⁵

In the NAL, the Bureau also announced that, in light of FTS’s demurrer to the FTS LOI questions about all FTN affiliates, the Bureau would be sending out that day separate LOIs to 235 FTN affiliates. The Bureau in fact sent LOIs en masse to affiliates of the FTN on June 3, 2010 (the “Affiliate LOIs”), and to certain additional television stations, with each LOI asking a series of questions about the American Dad Episode. To the knowledge of Licensees, each of the Affiliate LOIs poses the same eight questions to FTN affiliates, each establishes a 30-day

² *Fox Television Stations, Inc.*, Notice of Apparent Liability for Forfeiture, DA 10-995, released June 3, 2010.

³ NAL nn.11 and 12 and ¶¶ 6 and 8.

⁴ *Id.* n.16.

⁵ *Id.* ¶¶ 15-16.

response deadline, and each attaches a copy of the FTS LOI.⁶ The FTS LOI, in turn, contains a single attached complaint, directed to KDFW (the "KDFW Complaint"). To the knowledge of Licensees, no complaints other than the KDFW Complaint were attached to any of the Affiliate LOIs. Undersigned counsel for NW, as well as Mark Prak, counsel for Fisher Communications, Inc. and Quincy Newspapers, Inc., report that their informal telephonic requests (for NW, after issuance of the FTS LOI; for Fisher/Quincy, after issuance of the Affiliate LOIs) asking the Bureau to supply particularized complaints in markets other than the Dallas, Texas market, were denied.

Given the important threshold procedural issues raised by the Affiliate LOIs, Licensees have elected to submit this consolidated Petition. The Petition's goal is to articulate, in a respectful manner, why the requirement that Licensees respond to the Affiliate LOIs should immediately be stayed, consistent with established full Commission precedent.⁷

DISCUSSION

In *SBC Communications, Inc.*, Forfeiture Order, 17 FCC Rcd 7589 (2002) ("*SBC*"), the Commission, in a case referred to it by the Bureau, imposed a \$100,000 forfeiture on SBC Communications, Inc. ("*SBC*") for its deliberate, repeated refusal to supply a declaration under penalty of perjury (the "Declaration") to accompany its substantive response to a Bureau LOI. Submission of the Declaration had been required by that LOI. The Commission rejected SBC's arguments as to why it should not be compelled to submit the Declaration. The FCC also expressly faulted SBC for its failure on at least two occasions to seek a stay, under Sections 1.43

⁶ Robert E. Levine, counsel for Lingard Broadcasting Corporation, reports that the Affiliate LOI as initially sent to Lingard did not contain copies of the FTS LOI or the complaint against KDFW attached thereto.

⁷ Licensees are also submitting to the Bureau this day a closely related Consolidated Motion for Extension of Time ("Extension Request").

and 1.44 of the Commission's Rules: "[A]t the same time [as it submitted its substantive LOI response], or at least upon receiving notice that it was in violation of the order, SBC could have petitioned the Commission or the Bureau for a stay of the portion of the [LOI] that required the sworn statement. Nonetheless, SBC chose not to avail itself of the opportunity to raise a *genuine good faith challenge* to the order." *Id.* ¶ 19 (footnotes omitted) (emphasis added). *See also id.* ¶ 3 ("SBC did not request that the Bureau or the Commission stay the portion of the NAL directing it again to provide a sworn statement."). *SBC* therefore clearly establishes a petition for stay as one appropriate procedural pathway for raising a "genuine good faith challenge" to a Bureau LOI, a pathway that Licensees are expressly following here.⁸

The basis for this Petition is simple. The Commission has historically pursued indecency enforcement actions on the basis of "documented complaints" from the public.⁹ Despite this general principle, for a few years leading up to 2006, the FCC pursued potential indecency enforcement action against *all* affiliates of a national television network, regardless of whether a local viewer complaint had been filed against a *particular* affiliate.¹⁰ But in 2006, the Commission deliberately rejected the approach embodied in the 2004 *Married By America* decision, and returned to the bedrock principle that the FCC will pursue indecency enforcement action against an individual television broadcast station only upon receipt by the FCC of a complaint against that station submitted by a local viewer (the "Local Viewer Complaint

⁸ *SBC* does not stand for the proposition that a petition for stay is the only way to raise a genuine good faith challenge to a Commission order.

⁹ *Industry Guidance on the Commission's Case Law Interpreting 18 U.S.C. §1464 and Enforcement Policies Regarding Broadcast Indecency*, Policy Statement, 16 FCC Rcd 7999, 8015 (¶ 24) (2001) ("*Industry Guidance*").

¹⁰ *See, e.g., Complaints Against Various Television Licensees Regarding Their Broadcast of the Fox Television Network Program "Married By America" on April 7, 2003*, Notice of Apparent Liability for Forfeiture, 19 FCC Rcd 20191, 20196 (¶ 16) (2004) (proposing an indecency forfeiture against all FTN affiliates that broadcast the program in question) (subsequent history omitted).

Predicate”).¹¹ Through the Local Viewer Complaint Predicate, the FCC recognized a substantial limitation on its investigative powers. The importance of such FCC restraint in indecency enforcement matters is rooted in the First Amendment and finds long lineage in Court precedent, which has expressly relied on FCC commitments to “proceed cautiously, as it has in the past” (*Pacifica*) and the tempering of “potential chilling effects” by “the Commission’s restrained enforcement policy” (*ACT I*).¹² To the knowledge of Licensees, the FCC has strictly observed the Local Viewer Complaint Predicate in processing indecency complaints in the years since its adoption.¹³ In addition, the FCC has invoked the Local Viewer Complaint Predicate in ongoing, high-profile litigation in federal Court, as evidence of the FCC’s restrained approach to indecency enforcement, consonant with its First Amendment obligations in this highly sensitive area of free speech regulation.¹⁴

¹¹ This policy was adopted and applied in two contemporaneous cases: (i) *Complaints Regarding Various Television Broadcasts Between February 2, 2002 and March 8, 2005*, Notices of Apparent Liability and Memorandum Opinion and Order, 21 FCC Rcd 2664, 2673, 2676, 2687 (¶¶ 32, 42, 86) (2006) (subsequent history omitted); and (ii) *Complaints Against Various Television Licensees Concerning Their December 31, 2004 Broadcast of the Program “Without A Trace,”* 21 FCC Rcd 2732, 2732 (¶ 19) (2006): “Although we are informed that other stations not mentioned in any complaint also broadcast the complained-of episode of ‘Without A Trace,’ we propose forfeitures *only* against those licensees whose broadcasts of the material between 6 a.m. and 10 p.m. *were actually the subject of viewer complaints to the Commission*. We recognize that this approach differs from that taken in previous Commission decisions involving the broadcast of apparently indecent programming. Our commitment to an *appropriately restrained enforcement policy*, however, justifies this more limited approach towards the imposition of forfeiture penalties.” (emphasis added).

¹² See *FCC v. Pacifica Foundation*, 438 U.S. 726, 761 n.4 (Powell, J., concurring) (“*Pacifica*”); *Action for Children’s Television v. FCC*, 852 F.2d 1332, 1340, n.14 (D.C. Cir. 1988) (“*ACT I*”).

¹³ In the section of its website dealing with viewer/listener complaints about indecency, the Commission instructs interested parties that “[e]nforcement actions in this area are based on documented complaints received from the public” See <http://www.fcc.gov/cgb/consumerfacts/obscene.html> (last visited Jun. 21, 2010).

¹⁴ See Brief for Respondents FCC and the United States, at 14, 37-38, 40-41, *ABC, Inc. v. FCC*, No. 08-0841 (2d Cir.), filed Aug. 22, 2009 (“Respts’ NYPD Blue Br.”).

Here, *none* of the Affiliate LOIs acknowledges the existence of the Local Viewer Complaint Predicate, nor does *any* Affiliate LOI either provide *any* evidence that the Local Viewer Complaint Predicate has been satisfied for *any* station other than KDFW or claim that the FCC has received complaints for each station that received an Affiliate LOI. That unequivocal record underpins this genuine good faith challenge to the Affiliate LOIs.

In the NAL, the Bureau emphasized that it was utilizing its investigative powers to inquire about *all* FTN affiliates at the threshold of its inquiry, in part to identify and winnow out those FTN affiliates that “edited or did not air” the American Dad Episode. NAL ¶ 13. The NAL also recited that the information sought about all FTN affiliates in the FTS was “necessary” to allow the Bureau “to evaluate the complaints” it has received about the American Dad Episode. *Id.* ¶ 10. These Bureau positions appear to be entirely inconsistent with the restrained approach to indecency enforcement articulated in the Commission precedent cited above. For the “restraint” embodied in the Local Viewer Complaint Predicate to have any practical import for broadcast licensees, the first “cut” in an indecency investigation of a television network program must address the central question of whether a local viewer has complained about a particular station. As the Commission succinctly summarized in November 2006 in the course of explaining its “consistent application of [its] restrained enforcement policy”: “[T]he sufficiency of a complaint *is the first step rather than the last step* in the Commission’s analysis.”¹⁵ The record contains no indication that the Bureau has yet performed any such “first

¹⁵ *Complaints Regarding Various Television Broadcasts Between February 2, 2002 and March 8, 2005*, Order, 21 FCC Rcd 13299, 13329 (¶ 77) (2006) (on remand) (emphasis added) (subsequent history omitted). The Commission also made clear in this decision (¶ 76) that “[i]n addition to demonstrating appropriate restraint in light of First Amendment values, this enforcement policy [of dismissing insufficient complaints] preserves limited Commission resources, while still vindicating the interests of local residents”

cut” or taken any such “first step” here.¹⁶ There is no need for the Bureau to take any steps at all to begin to investigate a matter that will ultimately lead nowhere because of the lack of a local viewer complaint.¹⁷

Under these circumstances, Licensees believe that the appropriate course of action is a stay of the requirement that they respond to the Affiliate LOIs until such time as the FCC establishes that the Local Viewer Complaint Predicate was satisfied with respect to each Licensee at the time of issuance of each Affiliate LOI. That is what Commission precedent calls for, at the threshold of a Bureau indecency enforcement investigation. Two considerations underline the urgency and propriety of the requested relief: (i) the importance which the Commission itself has repeatedly attached to its observance of the Local Viewer Complaint Predicate (*see, e.g.*, Respts’ NYPD Blue Br., *supra*, at 41)(“[w]here there is nothing in the record . . . to tie the complaints to [the station’s] local viewing area . . . , the Commission will dismiss indecency proceedings against a television program” (citations omitted); and (ii) to the extent the Local Viewer Complaint Predicate cannot be established, the saving of substantial costs and expenses that would otherwise be imposed on individual television network affiliates in submitting predictably redundant responses to virtually identical LOIs. The compliance cost

¹⁶ Phrased another way, Licensees do not understand why the agency or its licensees would or should expend *any* of their limited resources where the Local Viewer Complaint Predicate has not been satisfied.

¹⁷ *See Industry Guidance, supra*, 16 FCC Rcd at 8015 (¶ 24): The Commission’s “enforcement actions are based on documented complaints of indecent broadcasting received from the public.” An LOI is an enforcement “action.” *See also, id.*: “In order for a complaint to be considered, our practice is that it must generally include . . . the call sign of the station involved (¶ 24) If a complaint does not contain the supporting material described above, or if it indicates that a broadcast occurred during ‘safe harbor’ hours or the material cited does not fall within the subject matter scope of our indecency definition, it is usually dismissed by a letter to the complainant advising of the deficiency. In many of these cases, the station may not be aware that a complaint has been filed.” (¶ 25).

“stakes” are therefore high, not only for this Bureau inquiry into the American Dad Episode, but also for future Bureau indecency inquiries into other network television programming.

The showing set forth above clearly satisfies the traditional criteria for the grant of a stay as interim relief, as recognized by Commission precedent.¹⁸ Four criteria are traditionally consulted by the Commission in making stay determinations, with no one criterion being dispositive.¹⁹ In this case, as shown above:

(1) the merits not only strongly favor grant of the requested relief, the Commission itself has made clear that indecency enforcement is to be pursued only against stations that have been the subject of a local viewer complaint;

(2) in the absence of a stay, the First Amendment values promoted by the FCC’s carefully articulated and, until now, meticulously followed policy of restrained enforcement will suffer irreparable damage; moreover, the failure to grant a stay will unnecessarily and irreparably chill the speech of broadcasters improperly subjected to a broad government investigation and impose significant costs on Licensees that, if the Bureau’s issuance of the Affiliate LOIs is later overturned in whole or in part, can never be recouped;

(3) there are no other parties to Bureau indecency enforcement proceedings, so substantial harm to “other parties to the proceeding” is technically not involved; ultimately, to the extent the Local Viewer Complaint Predicate has not been satisfied in particular markets, local viewers’ interests are not even implicated; and

(4) grant of a stay would clearly serve the public interest by conserving agency and private resources, while at the same time preserving the agency’s appropriately restrained

¹⁸ See, e.g., *Shaw Communications, Inc.*, Memorandum Opinion and Order, 24 FCC Rcd 5852, 5855 (¶ 12) (2009) (citing *Virginia Petroleum Jobbers Ass’n v. FPC*, 259 F.2d 921, 925 (D.C. Cir. 1985)).

¹⁹ The four criteria are: (1) a likelihood of success on the merits; (2) the threat of irreparable harm absent grant of preliminary relief; (3) the degree of injury to other parties if relief is granted; and (4) that a stay will be in the public interest. *Hyperion Communications Long Haul, L.P.*, Order, 15 FCC Rcd 10202, 10203 (¶ 3) (WTB 2000) (granting request for emergency stay). See also *Time Warner Cable v. RCN Telecom Services of New York, Inc.*, Memorandum Opinion and Order, 15 FCC Rcd 5025, 5026 (¶ 2) (CSB 2000) (“No single factor is dispositive of a petition for stay. The Commission typically balances all four factors in exercising its discretion to grant or deny a stay but does not require a showing as to each single factor in every case.”); *AT&T Corp. v. Ameritech Corp.*, Memorandum Opinion and Order, 13 FCC Rcd 14508, 14515-16 (¶ 14) (1998) (“In applying the four [interim relief] criteria, we recognize that no single factor is necessarily dispositive.”).

approach to indecency enforcement, a public good the Commission itself has recognized and promoted.

REQUEST FOR EXPEDITION/REFERRAL

Licensees respectfully request expedited processing of this Petition and the related Extension Request. The current due date for responses to the Affiliate LOIs is July 6, 2010, the first business day after observance of the July 4th holiday. Given the very large number of substantive LOI responses represented here, prompt response by the Bureau is particularly necessary and appropriate. To the extent the Bureau concludes it needs more time to process and resolve this Petition, grant of the Extension Request will provide it any necessary time cushion.

Under the unusual circumstances of this case, Licensees respectfully make a further suggestion and request -- that the Bureau immediately refer this Petition to the full Commission for resolution in the first instance. Such a course of action would be entirely consistent with Section 0.5(c) of the Commission's Rules, cited and followed in *SBC, supra*, at note 1: "[T]he staff is at liberty to refer any matter at any stage to the Commission for action, upon concluding that it involves matters warranting the Commission's consideration" Again, grant of the Extension Request will give the Commission the time it needs to resolve the important threshold issues raised herein. Such a referral would not only eliminate any need for Licensees to appeal to the Commission in the hypothetical event of a Bureau denial of the requested relief, it would also place the issues raised herein squarely and promptly before the decision makers ultimately responsible for the Local Viewer Complaint Predicate which forms the legal basis of this Petition.

* * *

Licensees are keenly aware that this Petition and the Extension Request are being submitted against the backdrop of the NAL, in which NW had raised issues concerning the Local

Viewer Complaint Predicate, yet the Bureau made a special effort to emphasize its views as to the importance of compliance with FCC directives, punctuated by a very substantial proposed forfeiture. Nonetheless, for the reasons given above, Licensees believe their procedural approach to be entirely consistent with prior FCC advice as to an appropriate manner to lodge a genuine good faith challenge to an LOI, and their substantive arguments to be firmly grounded in Commission precedent. Licensees trust that the issues they have raised herein can be resolved expeditiously, in a way that will be conducive to continued open and frank dialogue between the agency and its regulatees on issues of industry-wide importance.

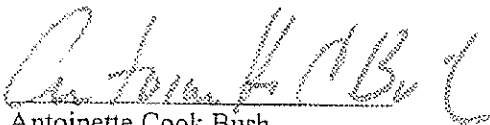
CONCLUSION

For the reasons set forth above, Licensees respectfully request that the Bureau, or the Commission on referral from the Bureau, immediately stay, in accordance with this Petition, the requirement that Licensees, respectively, respond to the Affiliate LOIs.

Respectfully submitted,

**LICENSEES OF THE 202 TELEVISION
BROADCAST STATIONS LISTED IN THE
ATTACHMENT HERETO**

By:



Antoinette Cook Bush
Jared S. Sher
Skadden, Arps, Slate, Meagher & Flom
LLP & Affiliates
1440 New York Avenue, NW
Washington, DC 20005

By:



Dennis P. Corbett
Lerman Senter PLLC
2000 K Street, NW
Suite 600
Washington, DC 20006-1809

*Counsel to FTV Affiliates Owned and
Operated by Fox Television Holdings, Inc.*

*Counsel to Non-Fox-Owned and Operated FTV
Affiliates*

June 23, 2010

ATTACHMENT

American Spirit Media, LLC
KYOU-TV, Ottumwa, IA

Barrington Albany License LLC
WFXL, Albany, GA

Barrington Colorado Springs License LLC
KXRM-TV, Colorado Springs, CO

Barrington Columbia License LLC
WACH, Columbia, SC

Barrington Marquette License LLC
WLUC-TV, Marquette, MI

Bayou City Broadcasting, LLC
KIDY, San Angelo, TX
KXVA, Abilene, TX

Broadcasting Licenses, L.P.
KMOV-DT, Medford, OR

CMCG Portland License LLC
WPFO, Waterville, ME

Cadillac Telecasting Co.
WFQX-TV, Cadillac, MI/WFUP, Vanderbilt,
MI

California Oregon Broadcasting, Inc.
KLSR-TV, Eugene, OR

Channel 40, Inc., Debtor-In-Possession
KTXL, Sacramento, CA

Chesapeake Television Licensee, LLC
WBFF, Baltimore, MD

Coastal Television Broadcasting Company LLC
KTBY, Anchorage, AK

Columbus (WTTE-TV) Licensee, Inc.
WTTE, Columbus, OH

Comcorp of Alexandria License Corp.
WNTZ-TV, Natchez, MS

Comcorp of Baton Rouge License Corp.
WGMB-TV, Baton Rouge, LA

Comcorp of Bryan License Corp.
KYLE-TV, Bryan, TX

Comcorp of Louisiana License Corp.
KADN-TV, Lafayette, LA

Comcorp of Texas License Corp.
KPEJ-TV, Odessa, TX
KMSS-TV, Shreveport, LA
KWKT-TV, Waco, TX

Commonwealth Broadcasting Group, Inc.
WABG-TV, Greenwood, MS

Community Television of Colorado License,
LLC
KDVR, Denver, CO
KFCT, Fort Collins, CO

Community Television of Missouri License,
LLC
KTVI, St. Louis, MO

Community Television of North Carolina
License, LLC
WGHP, High Point, NC

Community Television of Ohio License, LLC
WJW, Cleveland, OH

Community Television of Utah License, LLC
KSTU, Salt Lake City, UT

Community Television of Wisconsin License,
LLC
WITI, Milwaukee, WI

Compass Communications of Idaho, Inc.
KFXP, Pocatello, ID

Cowles California Media Company
KKFX-CA, San Luis Obispo, CA

Davis Television Wausau, LLC
WFXS-DT, Wittenberg, WI

Entravision Holdings, LLC*
KXOF-CA, Laredo, TX

Esteem Broadcasting of North Carolina LLC
WFXI, Morehead City, NC

Esteem License Holdings, Inc.
WEMT, Greeneville, TN

Falls Broadcasting Company
KXTF, Twin Falls, ID

Fisher Broadcasting-California TV, L.L.C.
KBFX-CA, Bakersfield, CA

Fox Television Stations, Inc. (Fox O&O)
WFXT, Boston, MA
WFLD, Chicago, IL
KRIV, Houston, TX
KTTV, Los Angeles, CA
WHBQ-TV, Memphis, TN
KMSP-TV, Minneapolis, MN
WNYW, New York, NY
WOGX, Ocala, FL
WOFL, Orlando, FL
WTFX-TV, Philadelphia, PA
WTTG, Washington, DC

GB Roanoke Licensing LLC
WFXR, Roanoke, VA

GM LaCrosse Licensing LLC
WLAX, La Crosse, WI

* Entravision Communications Corporation holds a Section 325(c) permit to deliver programming to XHRIO in Mexico.

Gocom Media of Illinois, LLC
WRSP-TV, Springfield, IL/WCCU, Urbana, IL

Gray Television Licensee, LLC
WAHU-CA, Charlottesville, VA
WBKO, Bowling Green, KY
WHSV-TV, Harrisonburg, VA
WTAP-TV, Parkersburg, WV
KXII, Sherman, TX

Gulf-California Broadcast Company
KECY-TV, El Centro, CA
KDFX-CA, Indio/Palm Springs, CA
KESQ-TV, Palm Springs, CA

High Maintenance Broadcasting, LLC
KUQI, Corpus Christi, TX

Hill Broadcasting Company, Inc.
KTVG-TV, Grand Island, NE

Hoak Media of Nebraska License, LLC
K11TW, North Platte, NE

Huntsville Television Acquisition Licensing LLC
WZDX, Huntsville, AL

Idaho Independent Television, Inc.
KTRV-TV, Nampa, ID

Independence Television Company
WDRB, Louisville, KY

Independent Communications, Inc.
KTTW, Sioux Falls, SD/KTTM, Huron, SD

Jackson Broadcasting LLC
WDBD, Jackson, MS

Journal Broadcast Corporation
WFTX-TV, Cape Coral, FL
WSYM-TV, Lansing, MI

KABB Licensee, LLC
KABB, San Antonio, TX

KBSI Licensee L.P.

KBSI, Cape Girardeau, MO

KDSM Licensee, LLC

KDSM-TV, Des Moines, IA

KEVN, Inc.

KEVN-TV, Rapid City, SD/KIVV-TV, Lead,
SD

KMSB-TV, Inc.

KMSB, Tucson, AZ

KOKH Licensee, LLC

KOKH-TV, Oklahoma City, OK

KQDS Acquisition Corp.

KQDS-TV, Duluth, MN

KSWB Inc., Debtor-In-Possession

KSWB-TV, San Diego, CA

KTVU Partnership

KRXI-TV, Reno, NV
KFOX-TV, El Paso, TX
KTVU, Oakland, CA

KVVU Broadcasting Corporation

KVVU-TV, Henderson, NV

LIN of Alabama, LLC

WALA-TV, Mobile, AL

LIN of New Mexico, LLC

KASA-TV, Santa Fe, NM

LIN of Wisconsin, LLC

WLUK-TV, Green Bay

Lincoln Broadcasting, LLC

KFXL-TV, Lincoln, NE

Lingard Broadcasting Corporation

WLOV-TV, West Point, MS

Louisiana Media Company, LLC

WVUE-DT, New Orleans, LA

MMM License LLC

KWYB, Butte, MT
KTMF, Missoula, MT

MMM License II LLC

KFBB-TV, Great Falls, MT
KHBB-LD, Helena, MT

Meredith Corporation

WHNS, Greenville, SC
KPTV, Portland, OR

Mission Broadcasting, Inc.

KCIT, Amarillo, TX
KHMT, Hardin, MT
WFXP, Erie, PA
WFXW, Terre Haute, IN
KJTL, Wichita Falls, TX

Morris Network of Mississippi, Inc.

WXXV-TV, Gulfport, MI

Mountain Licenses, L.P.

KAYU-TV, Spokane, WA
KCYU-LD, Yakima, WA/KFFX-TV, Pendleton,
OR

NPG of Oregon, Inc.

KFXO-LP, Bend, OR
KTVZ, Bend, OR

NW Communications of Austin, Inc. (Fox
O&O)

KTBC, Austin, TX

NW Communications of Phoenix, Inc. (Fox
O&O)

KSAZ-TV, Phoenix, AZ

National Communications, LLC

KVHP, Lake Charles, LA

New Age Media of Pennsylvania License, LLC

WOLF-TV, Hazleton, PA

New Age Media of Tallahassee License, LLC

WTLH, Bainbridge, GA

New Age Media of Tennessee License, LLC
WDSI-TV, Chattanooga, TN

New World Communications of Atlanta, Inc.
(Fox O&O)
WAGA-TV, Atlanta, GA

New World Communications of Detroit, Inc.
(Fox O&O)
WJBK, Detroit, MI

New World Communications of Tampa, Inc.
(Fox O&O)
WTVT, Tampa, FL

Newport Television License LLC
WXXA-TV, Albany, NY
KLRT-TV, Little Rock, AR
WJKT, Jackson, TN
WAWS, Jacksonville, FL
KOKI-TV, Tulsa, OK
KSAS-TV, Wichita, KS

Nexstar Broadcasting, Inc.
KBTW-TV, Port Arthur, TX
WTVW, Evansville, IN
KFTA-TV, Ft. Smith, AR
WFFT-TV, Ft. Wayne, IN
WQRF-TV, Rockford, IL
KSFX-TV, Springfield, MO
WFXV, Utica, NY
KARD, West Monroe, LA

North Carolina Broadcasting Partners
WCCB, Charlotte, NC

Parker Broadcasting of Colorado, LLC
KFQX, Grand Junction, CO

Peak Media of PA Licensee LLC
WWCP-TV, Johnstown, PA

Prime Cities Broadcasting, Inc.
KNDX, Bismarck, ND
KXND, Minot, ND

Quad Cities Television Acquisition Licensing LLC
KLJB, Davenport, IA

Quincy Broadcasting Company
WGEM-TV, Quincy, IL

Ramar Communications, Inc.
KJTV-TV, Lubbock, TX

Red River Broadcast Co., LLC
KVRN, Fargo, ND

Rockfleet Broadcasting III, LLC
WFBX-TV, Bangor, ME

SagamoreHill of Minnesota Licenses, LLC
KXLT-TV, Rochester, MN

Sainte Partners II, L.P.
KCVU, Paradise, CA

Sainte Sepulveda, Inc.
KBVU, Eureka, CA

Seal Rock Broadcasters, L.L.C.
KCBA, Salinas, CA

Second Generation of Iowa, Ltd.
KFXA, Cedar Rapids, IA

Smith Media License Holdings, LLC
WFFF-TV, Burlington, VT

Southeastern Media Holdings, Inc.
WSFX-TV, Wilmington, NC
WFXG, Augusta, GA
WXTX, Columbus, GA

Springfield Broadcasting Partners
WFXB, Myrtle Beach, SC

Stainless Broadcasting, L.P.
WICZ-TV, Binghamton, NY

Sunbeam Television Corporation
WSVN, Miami, FL

Surtsey Media, LLC

KFJX, Pittsburg, KS

KVCT, Victoria, TX

Tanana Valley Television Company

KFXF, Fairbanks, AK

Tribune Television Company, Debtor-In-Possession

WPMT, York, PA

WTIC-TV, Hartford, CT

WXIN, Indianapolis, IN

Tribune Television Holdings, Inc., Debtor-In-Possession

WXMI, Grand Rapids, MI

Tribune Television Northwest, Inc., Debtor-In-Possession

KCPQ, Tacoma, WA

United Communications Corporation

KEYC-TV, Mankato, MN

WNYF/LP/CA/CD, Watertown/Massena, NY

WWNY-TV, Carthage, NY

WAVY Broadcasting, LLC

WVBT, Virginia Beach, VA

WGBC-TV, LLC

WGBC, Meridian, MS

WBRC License Subsidiary, LLC

WBRC, Birmingham, AL

WDAF License, Inc.

WDAF-TV, Kansas City, MO

WDFX License Subsidiary, LLC

WDFX-TV, Ozark, AL

WDKY License, LLC

WDKY-TV, Danville, KY

WFLX License Subsidiary, LLC

WFLX, West Palm Beach, FL

WMSN Licensee, LLC

WMSN-TV, Madison, WI

WNAC, LLC

WNAC-TV, Providence, RI

WPGH Licensee, LLC

WPGH-TV, Pittsburgh, PA

WPGX License Subsidiary, LLC

WPGX, Panama City, FL

WRAZ-TV, Inc.

WRAZ, Raleigh, NC

WRGT Licensee, LLC

WRGT-TV, Dayton, OH

WRLH Licensee, LLC

WRLH-TV, Richmond, VA

WSJV Television, Inc.

WSJV, Elkhart, IN

WSMH Licensee, LLC

WSMH, Flint, MI

WSYT Licensee L.P.

WSYT, Syracuse, NY

WTAT Licensee, LLC

WTAT-TV, Charleston, SC

WTNZ License Subsidiary, LLC

WTNZ, Knoxville, TN

WUHF Licensee, LLC

WUHF, Rochester, NY

WUPW Broadcasting, LLC

WUPW, Toledo, OH

WUTV Licensee, LLC

WUTV, Buffalo, NY

WVAH Licensee, LLC

WVAH-TV, Charleston, WV

WXIX License Subsidiary, LLC

WXIX-TV, Newport, KY

WYDC, Inc.

WYDC, Corning, NY

WYZZ Licensee, Inc.

WYZZ-TV, Bloomington, IL

WZTV Licensee, LLC

WZTV, Nashville, TN

Warwick Communications, Inc.

KFXK-TV, Longview, TX

West Central Ohio Broadcasting, Inc.

WOHL-CD, Lima, OH

Withers Broadcasting Company of Clarksburg,

LLC

WVFX, Clarksburg, WV

Woods Communications Corporation

WCOV-TV, Montgomery, AL

WyoMedia Corporation

KFNB, Casper, WY/KFNE, Riverton, WY

KLWY, Cheyenne, WY

KFNR, Rawlins, WY