

Exhibit 2—Appropriate Use of Form 316

Form 316 is appropriate for this transaction because (1) the licensee is a non-stock, governmental entity controlled by a Board of Governors, the members of which are appointed, by law, by an outside entity, namely the North Carolina General Assembly and (2) a majority of the voting members of the Board of Governors is scheduled to change over a four-month period between April and July 2013, constituting a sudden, insubstantial change in control. Neither governing documents nor structure of the licensee will change. *See Transfers of Control of Certain Licensed Non-Stock Entities*, Notice of Inquiry, 4 FCC Rcd 3403 (1989), ¶ 20 (“Gradual changes in the governing boards of a governmental licensee [should] not be classified as a transfer of control; the licensee must report such changes in its ownership reports, but prior Commission consent would not be required. . . . [A] sudden change in a majority of the governing board would be treated as an insubstantial transfer of control requiring prior Commission approval through the modified short form application procedure.”); *accord* Stephen F. Sewell, *Assignments and Transfers of Control of FCC Authorizations Under Section 310(d) of the Communications Act of 1934*, 43 FED. COMM. L.J. 277, 309-10 (1991).

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