

### **NO AGREEMENT**

There is no transaction agreement. Assignor has agreed to donate the WLWG(FM) construction permit to a noncommercial educational entity, GRACE FM, INC., a Pennsylvania non-profit organization which is qualified to hold a noncommercial educational license, as demonstrated in this application. As noted in a separate exhibit, if the instant assignment application is granted, prior to consummation Assignor will submit license for low power FM station WJLW-LP for cancellation to avoid any cross-ownership issues.

### **NO HOLDING PERIOD**

In 2000, the Commission declined to adopt a holding period on assignments or transfers for construction permits awarded through decisive Section 307(b) preferences. *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, Report and Order, 15 FCC Rcd 7386, ¶ 93 (2000) (“[A] four year holding period will apply to applicants selected through a point system. We do not adopt a holding period on assignments or transfers for licensees receiving no such points (such as non-mutually exclusive applicants, or licenses awarded through settlement), or for permits awarded through decisive Section 307(b) preferences.”); *see also Reexamination of the Comparative Standards and Procedures for Licensing Noncommercial Educational Broadcast Stations and Low Power FM Stations*, Report and Order, 34 FCC Rcd 12519, ¶¶ 27-28 & n.82 (2019).

Assignor was issued the WLWG(FM) construction permit following a decisive Section 307(b) preference decision. *See Threshold Fair Distribution Analysis of 15 Groups of Mutually Exclusive Applications for Permits to Construct New Noncommercial Educational FM Stations*, Memorandum Opinion and Order, 37 FCC Rcd 2981, ¶ 15 (MB 2022). Accordingly, the WLWG(FM) construction permit is not subject to a four-year holding period.