

**IDENTIFICATION OF PAST, PRESENT AND PROPOSED ATTRIBUTABLE
INTERESTS IN FORT MYERS BROADCASTING COMPANY AND DESCRIPTION
OF TRANSACTIONS CONSTITUTING PRO FORMA TRANSFER OF CONTROL**

LAST LONG FORM TRANSFER OF CONTROL.

The last long form transfer of control of Fort Myers Broadcasting Company (“FMBC”)¹ was authorized in FCC File No. BTCCT-19990308IA, granted August 20, 1999, and consummated August 31, 1999. In that application, the Commission approved the following ownership of FMBC’s 150 shares of common stock:

<u>Name</u>	<u>Number of Shares</u>	<u>Percent Interest</u>
Brian A. McBride ² , Trustee Fort Myers Broadcasting Company Arthur B McBride Trust No. 1 ³	24 2/3	16.44
Maureen McBride ⁴ , Trustee Fort Myers Broadcasting Company Arthur B McBride Trust No. 2 ⁵	24 2/3	16.44
Kathleen McBride Plum ⁶ , Trustee Fort Myers Broadcasting Company Arthur B. McBride Trust No. 3 ⁷	24 2/3	16.44
Brian A. McBride, Trustee Brian A. McBride Revocable Trust ⁸	20	13.33
Maureen McBride	12	8
Kathleen McBride Plum	12	8
Gerald McBride	10	6.66
Rita McBride	2	1.33
Edward McBride ⁹	10	6.66
Thomas McBride	10	6.66

Under this ownership arrangement, the children of Arthur B. McBride Jr. voted the following shares of FMBC stock, individually and/or as trustee of various family trusts:

Brian A. McBride	44 2/3 shares	29.777 percent
Maureen McBride	36 2/3 shares	24.444 percent

¹ Fort Myers Broadcasting Company’s FCC Registration Number (“FRN”) is 0004078598.

² The FRM for Brian A McBride is 0019989094.

³ The FRN for Fort Myers Broadcasting Company Arthur B McBride Trust No. 1 is 0019989300.

⁴ The FRN for Maureen McBride is 0019989128.

⁵ The FRN for Fort Myers Broadcasting Company Arthur B McBride Trust No. 2 is 0019989318.

⁶ The FRN for Kathleen M. Plum is 0019990613.

⁷ The FRN for Fort Myers Broadcasting Company Arthur B McBride Trust No. 3 is 0019989326.

⁸ The FRN for Brian A McBride Revocable Trust is 0019989417.

⁹ The FRN for Edward McBride is 0019989185.

Kathleen McBride Plum	36 2/3 shares	24.444 percent
Total	118 shares	78.666 percent

PRESENT OWNERSHIP

In the 21 years since FMBC's last long form transfer of control application, there have been some changes in ownership of the company. Presently FMBC is owned as follows and these individuals and entities are parties to this application:

<u>Name</u>	<u>Number of Shares</u>	<u>Percent Interest</u>
Brian A. McBride, Trustee Fort Myers Broadcasting Company Arthur B McBride Trust No. 1	25 1/3	16.89
Maureen McBride, Trustee Fort Myers Broadcasting Company Arthur B McBride Trust No. 2	25 1/3	16.89
Kathleen McBride Plum, Trustee Fort Myers Broadcasting Company Arthur B. McBride Trust No. 3	25 1/3	16.89
Brian A. McBride, Trustee Brian A. McBride Revocable Trust	5	3.33
Maureen McBride	3	2
Kathleen McBride Plum, Trustee Kathleen M. Plum Business Trust ¹⁰	3	2
Brian A. McBride, Trustee Rita McBride 2012 Trust FBO Lineal Descendants of Maureen McBride ¹¹	12 1/3	8.22
Brian A. McBride, Trustee Rita McBride 2012 Trust FBO Lineal Descendants of Kathleen M Plum ¹²	12 1/3	8.22
Brian P McBride ¹³ Co- Trustee Colleen L. McBride ¹⁴ Co-Trustee Rita McBride 2012 Trust FBO Lineal Descendants of Brian A. McBride ¹⁵	18 1/3	12.22
Edward McBride	10	6.66

¹⁰ The FRN for Kathleen M. Plum Business Trust is 0019989425.

¹¹ The FRN for Rita McBride 2012 Trust FBO Lineal Descendants of Maureen McBride is 0023108392.

¹² The FRN for Rita McBride 2012 Trust FBO Lineal Descendants of Kathleen M. Plum is 0023107956.

¹³ The FRN for Brian P McBride is 0023108517.

¹⁴ The FRN for Colleen L McBride is 0023108566.

¹⁵ The FRN for Rita McBride 2012 Trust FBO Lineal Descendants of Brian A. McBride is 0023108491.

After consideration of these gradual changes, control of FMBC continues to reside in the following persons and entities approved in the 1999 long form transfer of control application: (a) Brian A. McBride, Trustee, Brian A. McBride Revocable Trust; Brian A. McBride, Trustee, Fort Myers Broadcasting Company Arthur B McBride Trust No. 1; Maureen McBride, individually; Maureen McBride, Trustee Fort Myers Broadcasting Company Arthur B McBride Trust No. 2; Kathleen McBride Plum, Trustee, Fort Myers Broadcasting Company Arthur B McBride Trust No. 3; and Edward McBride, individually. Collectively these persons vote 94 shares of FMBC stock representing 62 2/3% of the votes and equity of FMBC.

Additionally the children of Arthur B McBride Jr. continue to have voting control the licensee, by virtue of voting the following shares of FMBC stock, individually and/or as trustees of various family trusts:

Brian A. McBride	55 shares	36.666 percent
Maureen McBride	28 1/3 shares	18.888 percent
Kathleen McBride Plum	28 1/3 shares	18.888 percent
Total	111 2/3 shares	74.444 percent

The officers and directors of Fort Myers Broadcasting Company hold attributable interests in the company by virtue of their official positions and presumably are parties to this application. These persons are:

Brian A. McBride	Director, President, Treasurer
Kathleen Plum	Director, Vice President
Maureen McBride	Director, Vice President, Secretary
Linda McBride	Director
Monica Kummer ¹⁸	Assistant Treasurer
Mark Gilson ¹⁹	Assistant Secretary

PROPOSED CHANGES IN OWNERSHIP

In this application, the children of Arthur B. McBride, Jr. seek FCC approval to transfer certain shares of FMBC from one set of family trusts to three additional family trusts, each controlled by one of the children of Arthur B. McBride, Jr. In this connection, all of the FMBC shares held by Brian A McBride Revocable Trust, by Kathleen M. Plum Business Trust and by Maureen McBride, individually, will be contributed to the new trusts and these entities and Maureen McBride, in her individual capacity, will no longer be FMBC shareholders. At the conclusion of the proposed transaction, FMBC's stock will be owned as follows and these individuals and entities are parties

¹⁶ The FRN for Linda McBride is 0021290309.

¹⁷ The FRN of the Thomas Martin McBride Family Trust is 0023107899.

¹⁸ The FRN for Monica Kummer is 0030314595.

¹⁹ The FRN for Mark Gilson is 0028539500.

to this application:

<u>Name</u>	<u>Number of Shares</u>	<u>Percent Interest</u>
Brian A. McBride, Trustee Maureen McBride FMBC Irrevocable Trust of 2020 ²⁰	18 1/3	12.22
Brian A. McBride, Trustee Kathleen M. Plum FMBC Irrevocable Trust of 2020 ²¹	14 1/3	9.56
Maureen McBride, Trustee Brian A. McBride FMBC Irrevocable Trust of 2020 ²²	25 1/3	16.89
Brian A. McBride, Trustee Fort Myers Broadcasting Company Arthur B McBride Trust No. 1	5	3.33
Maureen McBride, Trustee Fort Myers Broadcasting Company Arthur B McBride Trust No. 2	10	6.66
Kathleen McBride Plum, Trustee Fort Myers Broadcasting Company Arthur B. McBride Trust No. 3	14	9.33
Brian A. McBride, Trustee Rita McBride 2012 Trust FBO Lineal Descendants of Maureen McBride	12 1/3	8.22
Brian A. McBride, Trustee Rita McBride 2012 Trust FBO Lineal Descendants of Kathleen M Plum	12 1/3	8.22
Brian P McBride Co- Trustee Colleen L. McBride Co-Trustee Rita McBride 2012 Trust FBO Lineal Descendants of Brian A. McBride	18 1/3	12.22
Edward McBride	10	6.66
Linda McBride, Trustee Thomas Martin McBride Family Trust	10	6.66
Total for all shareholders	150	100

²⁰ The FRN of the Maureen McBride FMBC Irrevocable Trust of 2020 is 0030307730.

²¹ The FRN of the Kathleen M Plum FMBC Irrevocable Trust of 2020 is 0030307722.

²² The FRN of the Brian A. McBride FMBC Irrevocable Trust of 2020 is 0030307698.

Under the proposed ownership arrangement, the children of Arthur B McBride, Jr. will continue to control the licensee, voting the following shares of stock as trustees of various family trusts:

Brian A. McBride	62 1/3 shares	41.555 percent
Maureen McBride	35 1/3 shares	23.555 percent
Kathleen McBride Plum	14 shares	9.333 percent
Total	111 2/3 shares	74.444 percent

Further no single individual or entity will have 50% or more voting power in FMBC, either before or after consummation of these transactions.

With respect to the Brian A. McBride FMBC Irrevocable Trust of 2020, the Maureen McBride FMBC Irrevocable Trust of 2020 and the Kathleen M. Plum FMBC Irrevocable Trust of 2020, each trust has a “Trust Advisor” who, under certain circumstances, can take action to preserve the trust and facilitate its administration. All acts of the Trust Advisor are subject to compliance with FCC rules and policies. The Trust Advisor for each trust is as follows:

<u>Trust</u>	<u>Trust Advisor</u>
Brian A. McBride FMBC Irrevocable Trust of 2020	Kathleen M. Plum
Maureen McBride FMBC Irrevocable Trust of 2020	Kathleen M. Plum
Kathleen M. Plum FMBC Irrevocable Trust of 2020	Maureen McBride

Each of the Brian A. McBride FMBC Irrevocable Trust of 2020, the Maureen McBride FMBC Irrevocable Trust of 2020 and the Kathleen M. Plum FMBC Irrevocable Trust of 2020 has a “Decision-Making Body” which, under certain circumstances, can take action to facilitate administration of the trust. The Decision-Making Body of each trust presently consists of the children and spouse of the Grantor. All acts of the Decision-Making Body are subject to compliance with FCC rules and policies. The Decision-Making Body for each trust is comprised as follows:

<u>Trust</u>	<u>Decision-Making Body</u>
Brian A. McBride FMBC Irrevocable Trust of 2020	Jill McBride ²³ Brian Patrick McBride Colleen Louise McBride Kelly Lynn McBride ²⁴
Maureen McBride FMBC Irrevocable Trust of 2020	David Eucker ²⁵ Christina Marie Eucker ²⁶ Daniel David Eucker ²⁷

²³ The FRN for Jill McBride is 0030307953.

²⁴ The FRN for Kelly Lynn McBride is 0030301956.

²⁵ The FRN for David Eucker is 0030307870.

²⁶ The FRN for Christina Marie Eucker is 0030302020.

²⁷ The FRN for Daniel David Eucker is 0030307888.

Each of the Brian A. McBride FMBC Irrevocable Trust of 2020, the Maureen McBride FMBC Irrevocable Trust of 2020 and the Kathleen M. Plum FMBC Irrevocable Trust of 2020 contains the following limitation on the actions of all persons acting under the terms of the trust:

Federal Communications Commission Provisions

Section 1 – Federal Communications Law to Govern Administration. All persons and entities acting under this instrument and each trust administered under this instrument must comply with the statutes, rules and policies administered by the FCC. Accordingly:

- (a) *FCC Law will take precedence over any contrary right of obligation expressed in this instrument.*
- (b) *Every power granted, every right granted and every obligation or discretionary act undertaken under this instrument, or if silent, applicable trust law, are granted or to be undertaken to the full extent permitted by FCC Law, but only to the extent permitted by FCC Law.*
- (c) *By way of illustration of Section 1(b) but not limitation:*
 - (1) *No security interest may attach to an FCC license unless and until FCC Law permits creation of such a security interest.*
 - (2) *No transfer of control or assignment of a broadcast license may occur without prior application to and approval by the FCC.*
 - (3) *No attributable interest in a broadcast licensee may be acquired by any person lacking the character qualifications to be an FCC licensee.*
 - (4) *No foreign national or company organized under the laws of a foreign state may acquire a direct or indirect ownership interest in a broadcast licensee exceeding the limits established by FCC Law.*
 - (5) *No person may acquire an attributable interest in a broadcast licensee if that interest, in combination with other attributable media interests held by that person or by other attributable owners of the broadcast licensee, exceeds the permissible ownership limits prescribed in FCC Law.*

Section 2 – Definitions. As used in this instrument:

- (a) *“FCC” means the Federal Communications Commission.*

²⁸ The FRN of Lauren Nicole Plum is 0030307680.

²⁹ The FRN for Kelsey C. Plum is 0030307755.

³⁰ The FRN for Daniel J. Plum is 0030307896.

³¹ The FRN for Kaitlyn M. Lawrence is 0030307912.

(b) “FCC Law” means:

- (1) *The Communications Act of 1934, as amended, 47 U.S.C. §151 et seq.*
- (2) *The Rules and Regulations of the FCC, 47 C.F.R. §0.1 et seq.*
- (3) *The policies and case law of the FCC implementing and interpreting Section 2(b)(1) and Section 2(b)(2).*
- (4) *The decisions of the United States courts with respect to Section 2(b)(1), Section 2(b)(2) and Section 2(b)(3).*
- (5) *All of Section 2(b)(1), Section 2(b)(2), Section 2(b)(3) and Section 2(b)(4) as they presently exist and as they may be amended, supplemented, changes and/or superseded (by legislation, rulemaking, adjudication or otherwise) in the future.*

The proposed transfers described above are to be made for estate planning purposes. No agreements exist obligating the transferors to transfer FMBC stock to the transferees.

The natural persons who are parties to this application are US citizens. The entities that are parties to this application are all US domestic entities. The mailing address for each of these individuals and entities is c/o Fort Myers Broadcasting Company, 2824 Palm Beach Boulevard, Fort Myers, Florida 33916.