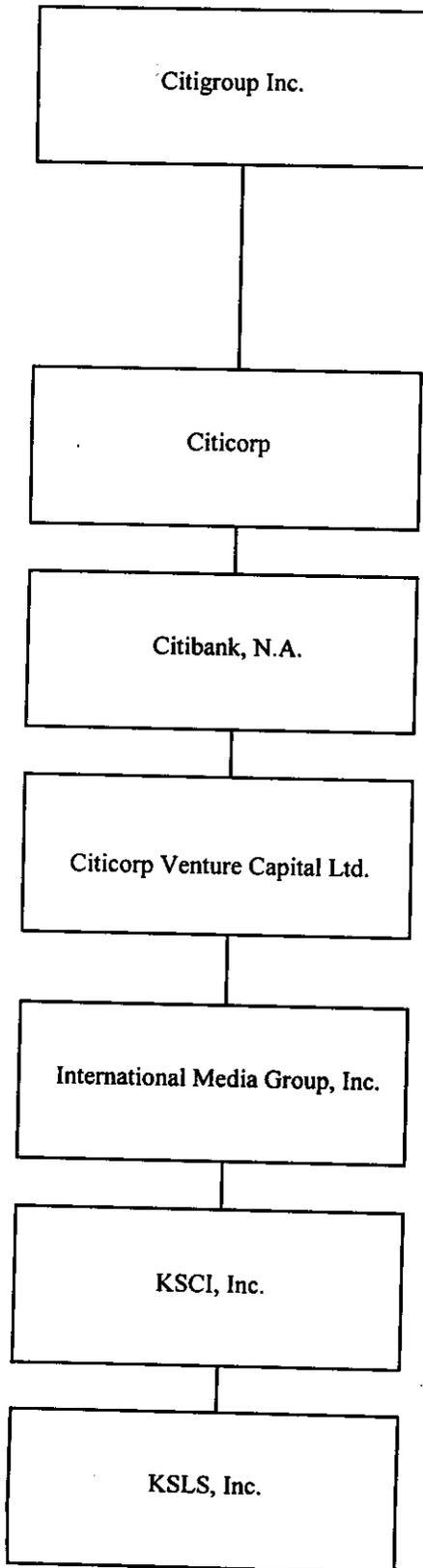


**Description of Transaction**

The instant application seeks Commission consent to a pro forma transfer of control of Commission licensee, KSLS, Inc. ("Applicant"). Specifically, the application reflects the insertion of Citigroup Holdings Company as a wholly owned subsidiary of Citigroup Inc. in the corporate structure of the licensee. Accordingly, the instant transaction is pro forma in nature. This restructuring occurred in July, 1999. Through inadvertence the instant application was not filed at that time and the Applicant respectfully submits this application to correct this situation.

A chart illustrating the pro forma transfer of control described above is attached hereto.

Existing Structure



Proposed Structure

