

EXHIBIT 16

Satellite Showing for
WCDC-TV, Adams, Massachusetts
KDLO-TV, Florence, South Dakota
KPLO-TV, Reliance, South Dakota

With respect to Section III, Question 6(b), the Assignee certifies that the proposed transfer complies with the Commission's multiple ownership rules and cross-ownership rules, except to the extent set forth in this Exhibit 16 with respect to a request for the Commission's grant of continued authority to (i) operate WCDC-TV, Adams, Massachusetts as a satellite of WTEN(TV), Albany, New York; (ii) operate KDLO-TV, Florence, South Dakota as a satellite of KELO-TV, Sioux Falls, South Dakota; and (iii) operate KPLO-TV, Reliance, South Dakota as a satellite of KELO-TV, Sioux Falls, South Dakota. All three of the relevant communities of license are underserved, and grant of the authority requested will maintain the status quo for viewers in those areas.

WTEN(TV) and its satellite station WCDC-TV are licensed to Young Broadcasting of Albany, Inc., Debtor-in-Possession ("Young Broadcasting of Albany"). KELO-TV and its satellite stations KDLO-TV and KPLO-TV are licensed to Young Broadcasting of Sioux Falls, Inc., Debtor-in-Possession ("Young Broadcasting of Sioux Falls"). Young Broadcasting of Albany and Young Broadcasting of Sioux Falls are currently being operated under the protections of Chapter 11 of the U.S. Bankruptcy Code in consolidated cases before the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court"). See *Young Broadcasting Inc., et al., Debtors, Chapter 11*, Case No. 09-10645 (Bankr. S.D.N.Y.).

New Young Broadcast Holding Co. Inc. ("New Young") is acquiring Young Broadcasting, Inc., Debtor-in-Possession ("Young"), the ultimate parent of Young Broadcasting of Albany and Young Broadcasting of Sioux Falls, as part of the court-ordered transfer of control of broadcast licenses. This transfer of control is contemplated to be made pursuant to the implementation of a Chapter 11 Plan of reorganization, with all of the newly issued equity in a reorganized Young to be held by New Young. See Exhibit 12 of this Application. New Young requests that the Commission grant continued authority for Young Broadcasting of Albany to operate WCDC-TV as a satellite of WTEN(TV) and continued authority for Young Broadcasting of Sioux Falls to operate KDLO-TV and KPLO-TV as satellites of KELO-TV.

The grant of this authority will allow Young to emerge from bankruptcy. The Commission has consistently found that, as part of its public interest analysis, it has an obligation to promote the national policies underlying other federal laws, including the bankruptcy laws.¹ It has specifically recognized that facilitating a company's "successful

¹ See, e.g., *San Diego Television, Inc., Debtor-in-Possession*, 11 FCC Rcd. 14689, ¶ 13 (1996); *Adelphia Communications Corp.*, 17 FCC Rcd. 24544, ¶ 4 and n.9 (Enf. Bur. 2002); see also *La Rose v. FCC*, 494 F.2d 1145, 1146 n.2 (D.C. Cir. 1974).

emergence from bankruptcy advances the public interest by providing economic and social benefits.”² In this case, Commission approval of continued authority to provide satellite service will serve the public interest by, among other things, allowing Young Broadcasting of Albany and Young Broadcasting of Sioux Falls to (1) promptly complete their reorganization under Chapter 11 of the Bankruptcy Code, thus serving the public interest objectives of that statute; (2) eliminate the significant financial and operational burdens associated with operating under bankruptcy protections, thus freeing additional financial and operational resources to focus on upgrading programming and technical facilities in order to better serve the needs and interests of Albany, New York, Adams, Massachusetts, Sioux Falls, South Dakota, Florence, South Dakota, and Reliance, South Dakota; and (3) promptly emerge from bankruptcy protection as stronger, more robust competitors in the respective local broadcast markets of Young Broadcasting of Albany and Young Broadcasting of Sioux Falls.

In contrast, if the Commission fails to grant authority for the continued operation of WCDC-TV, KDLO-TV, and KPLO-TV as satellite stations, the plan of reorganization will be, at the very least, jeopardized.

The system of parent and satellite stations has served the viewers of the Albany-Schenectady-Troy, New York and Sioux Falls (Mitchell), South Dakota DMAs well, and grant of the instant request will ensure continuity of programming throughout these DMAs. Adams, Massachusetts, the community of license of WCDC-TV, is an underserved area; WCDC-TV is the only full-service station licensed to Adams, Massachusetts. Florence, South Dakota, the community of license of KDLO-TV, is likewise an underserved area; KDLO-TV is the only full-service station license to Florence, South Dakota. Finally, Reliance, South Dakota, the community of license of KPLO-TV, is also an underserved area; KPLO-TV is the only full-service station licensed to Reliance, South Dakota.

Furthermore, throughout the bankruptcy proceeding (including a scheduled auction), no alternative operator has expressed any interest (let alone readiness) to the bankruptcy court in purchasing and operating either of these satellite stations as a full-service station.

In light of the foregoing, New Young respectfully requests that the Commission continue to permit operation of WCDC-TV as a satellite of WTEN(TV), continue to permit operation of KDLO-TV as a satellite of KELO-TV, and continue to permit operation of KPLO-TV as a satellite of KELO-TV.

² *WorldCom, Inc. and Its Subsidiaries, Transferor, and MCI, Inc., Transferee*, 18 FCC Rcd. 26484, ¶29 (2003).