

Exhibit 10
FCC Form 316
Section III, Paragraph 5

Raycom Media, Inc. (“Raycom”) owns, through its indirectly-owned subsidiary CivCo, Inc., three full-power television stations (including one satellite). Through the instant application and one companion FCC Form 316 application, Raycom seeks approval to implement a *pro forma* internal corporate reorganization to realign the corporate structure of the CivCo, Inc. stations to facilitate financing transactions. The instant application seeks FCC consent to the *pro forma* assignment of license of television station KLTV, Tyler, Texas, and its satellite KTRE, Lufkin, Texas (“Stations”), from one indirectly-owned licensee subsidiary of Raycom to a new indirectly-owned licensee subsidiary of Raycom.

As reflected in the Annex A “Before” diagram, the Stations are currently licensed to CivCo, Inc. Its sole member is CivCo License Holding Company, Inc., which is 100% owned by TV-3, Inc. TV-3, Inc. is wholly-owned by Raycom TV Broadcasting, LLC. Its sole member is Raycom TV Broadcasting, Inc., which is a first tier subsidiary of Raycom.

As reflected in the Annex A “After” diagram, following the *pro forma* corporate reorganization, the Stations will be licensed to KLTV/KTRE License Subsidiary, LLC, a newly-created Delaware LLC whose sole member will be KLTV/KRTE, LLC, a newly-formed Delaware LLC. Its sole member will be TV-3, LLC, a newly-formed Delaware LLC. The sole member of TV-3, LLC will be Raycom TV Broadcasting, LLC. Its sole member will remain Raycom TV Broadcasting, Inc., an existing first tier subsidiary of Raycom. While interim steps in the reorganization involve *pro forma* transfers of control of intermediate entities in the Raycom corporate structure, Section II Question 2 designates this

application as one for assignment of license (rather than transfer of control) because the final step in the reorganization will be the *pro forma* assignment of license of the Stations from Raycom's existing indirectly-owned subsidiary CivCo, Inc. to Raycom's newly-formed, indirectly-owned subsidiary KLTV/KTRE License Subsidiary, LLC.

Because the proposed transaction involves a corporate reorganization which does not involve any substantial change in the beneficial ownership of the corporation, it is properly the subject of FCC Form 316. *See* Section 73.3540(f)(4).¹

DC: 2349570-1

¹ As a *pro forma* corporate reorganization, there is no consideration involved in this transaction.