

August 15, 2002

Mr. Clay C. Pendarvis
Chief - Television Branch
Federal Communications Commission
Portals II
445 12th Street, SW
Room #2-A662
Washington, DC 20554

Re: Application for Transfer of Control of:

KVII-TV, Amarillo, Texas
KVIH-TV, Clovis, New Mexico

Dear Mr. Pendarvis:

In connection with the above referenced applications, I have been requested by the parties thereto to supply you with information related to the continued operation of KVIH-TV as a satellite of KVII-TV. This letter addresses the feasibility of operating and marketing KVIH-TV as a stand-alone operation rather than as a satellite.

By way of background, I have more than thirty years of experience in the broadcast industry as an owner, manager and broker of broadcast stations. I am the founder and president of CobbCorp, LLC, and a former founder and managing director of Media Venture Partners, both nationally recognized media brokerage and appraisal firms. I am responsible for the brokerage and appraisal of television stations for CobbCorp, and, during the past fifteen years, I have personally been involved in the brokerage of more television stations than any other media broker in the United States. I served as the President of the National Association of Media Brokers and regularly speak on industry panels.

I am familiar with the Amarillo market, its surrounding television markets, the signals of the television stations available in the market, and the level of competition among them and other relevant market data. As a result, I have enough knowledge to reach certain conclusions concerning KVII-TV and KVIH-TV's positions in the market.

CobbCorp, LLC

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There are 5 operating commercial television stations assigned to the Amarillo DMA the 128th largest television market as defined by Nielsen. KVIH is operated as a satellite of KVII as previously approved by the FCC.

If KVIH was converted to a full service station, it is highly probable that it would be financially unsuccessful and at a significant competitive disadvantage. A coverage map of the station shows that it is unable to adequately cover the DMA. In fact, the coverage does not include Amarillo or any other significant population center that would provide enough viewers and hence advertisers for KVIH to survive as a stand-alone.

Even if it were possible for KVIH-TV to serve a greater portion of the market, it would have little prospect of garnering affiliation agreements with any of the major networks. If KVIH were forced to broadcast as an independent, competing against the other stations that currently serve the market would make the prospects of economic survival slim.

As a result of an insufficient signal in the entire DMA, and the lack of any prospects of any meaningful network affiliation, it is my opinion that KVIH could not operate successfully as a stand-alone station. For the station to survive and provide service to the community, it should continue to operate as a satellite of a viable sister facility.

If the owners requested that CobbCorp acted as broker to attempt to sell KVIH as a stand-alone television station, I would decline since I feel that the financial viability to a new owner would be limited and I would be doing the buyer a disservice.

If you have any questions concerning the foregoing opinions, I will be available to respond to them.

Sincerely,

Brian E. Cobb

Brian E. Cobb
President