

FCC Form 315
Section IV, Question 8(b)
EXHIBIT 20A

Amendment to Temporary Waiver Requests

In this application and related applications, and as further described in Exhibit 15A, TEGNA Inc. (“TEGNA”) has proposed to acquire control of three licensees currently ultimately owned and controlled by Jack Sander (“Sander,” and together with TEGNA, the “Applicants”), including the licensee of KMSB, Tucson, Arizona. KMSB currently sells the advertising time of Tucson station KTTU, licensed to Tucker Operating Co. LLC (“Tucker”), pursuant to a joint sales agreement previously reviewed and approved by the Media Bureau (the “KMSB-KTTU JSA”).¹

In its FCC Form 315 applications filed on June 29, 2015, TEGNA sought (1) a temporary waiver of the newspaper-broadcast cross-ownership rule (“NBCO” rule) while TEGNA addressed Carl C. Icahn’s attributable interests in both TEGNA and Gannett Co., Inc., which separated from TEGNA as of June 29, 2015; and (2) a temporary waiver of the duopoly rule (the “JSA waiver request”) to permit retention of the KMSB-KTTU JSA for the duration of the period established by Congress for unwinding such agreements.

By this amendment, the Applicants withdraw the NBCO waiver request and amend the JSA waiver request to modify that waiver’s proposed duration.

With respect to the NBCO rule, a waiver is no longer necessary because Mr. Icahn and certain of his affiliates have executed a Voting and Proxy Agreement with TEGNA,

¹ See *Applications for Consent to Transfer of Control from Shareholders of Belo Corp. to Gannett Co., Inc.*, Memorandum Opinion and Order, 28 FCC Rcd 16867 (Media Bureau 2013) (“*Gannett/Belo*”). See also FCC File No. BALCDT-20130619ADJ, Attachment 13 (Asset Purchase Agreement), Exhibit B-3 (Form of Joint Sales Agreement).

dated as of October 15, 2015, as a result of which he no longer has an attributable interest in TEGNA. A copy of the Voting and Proxy Agreement is attached hereto as Exhibit 20B.

With respect to the JSA waiver request, the Applicants hereby amend that request to change the proposed duration of the waiver. Specifically, the Applicants hereby modify the JSA waiver request to request that the Commission waive the application of the duopoly rule with respect to the KMSB-KTTU JSA for nine months following the consummation of TEGNA's acquisition of control of KMSB. Grant of this temporary waiver request would serve the public interest by giving KTTU an opportunity to make an orderly transition away from the JSA.