

DECLARATION UNDER PENALTY OF PERJURY

James A. Zimmerman declares under penalty of perjury:

1. I am currently President of Media General Broadcasting Group ("MGBG"), a division of Media General, Inc. I have been associated with MGBG since 1977. In my current position, which I have held since 1992, I oversee operations for all the television stations owned and operated by Media General, Inc. As such, I am ultimately responsible for programming decisions and overall market strategy affecting the stations. In addition, I now oversee fulfillment of our obligations under a local marketing agreement ("LMA") with Pappas Telecasting of the Carolinas ("Pappas"), licensee of WASV-TV, Asheville, North Carolina, and am responsible for developing the longer-term strategy for that Station in the event that Media General, Inc. is permitted to own it.

2. On behalf of Media General, Inc. and its subsidiary, Media General Broadcasting of South Carolina Holdings, Inc. (collectively, "Media General"), I am submitting this Declaration in support of the request for waiver of Section 73.3555(b) of the FCC's rules (the "Waiver Request") in connection with the application for the assignment of the license for WASV-TV from Pappas to Media General. I have personal knowledge of the matters set forth herein and of the matters set forth in the Waiver Request.

3. I am well aware that, pursuant to the LMA for WASV-TV, the former Spartan Communications, Inc. ("Spartan") invested tremendous resources and expertise to make WASV-TV the successful television station that it is today. As successor-in-interest to Spartan under the LMA, Media General has embraced and continued that exceptional commitment to WASV-TV in the interest of providing superior and diverse programming to viewers throughout this market, especially those in Asheville, North Carolina and its vicinity.

4. If permitted to own WASV-TV, Media General would continue separate network affiliations for WSPA-TV (CBS), which Media General already owns in the same market as a result of its acquisition of Spartan, and WASV-TV (UPN), and would certainly continue to offer non-network programming on WASV-TV that is not broadcast on WSPA-TV (nor any other station in the market). Media General has a history of investing considerable resources to ascertain and respond to the special interests of viewers in all the markets in which it owns television stations. Media General would continue to invest the resources necessary to monitor the needs of WASV-TV's community on an ongoing basis and would explore adding other programming aimed at meeting those needs. Naturally Media General would have more incentive to undertake additional local programming initiatives as WASV-TV's owner. It would be Media General's goal as licensee to provide as much locally oriented programming as possible in order to serve viewers better and at the same time strengthen WASV-TV's competitiveness in the market, especially with respect to the other stations licensed to the Asheville community (the Fox and ABC network affiliates).

5. Media General is continuing the use of separate sales staffs for WASV-TV and WSPA-TV and, as owner of both stations, Media General would not change this scheme because of the very different target audiences of the two stations. All other operations would, however, remain consolidated as they are now, so that WASV-TV and the public could benefit as much as possible from the cost savings that arise from joint operations. To the extent that further opportunities arise to achieve cost savings, possibly through centralization of master controls and traffic control, for example, additional savings could be used to enhance what is already an excellent array of entertainment and other programming geared to local interests, in particular the interests of residents of Asheville and the surrounding communities of western North Carolina.

6. Among other ways in which Media General is committed to improving WASV-TV's service is through DTV conversion. The WASV-TV tower was designed to accommodate DTV, but there will be additional costs associated with the conversion currently estimated at about \$2,000,000 (not including the additional DTV programming costs). Media General would expend the financial resources necessary to implement the DTV conversion for WASV-TV and would provide for uninterrupted broadcast during the build-out. Under Media General's ownership, WASV-TV's timely DTV conversion would be guaranteed in fulfillment of the station's FCC obligations.

7. Media General is aware of the Commission's growing disfavor with LMAs and it is unclear what course of action Media General will choose if the Waiver Request is denied. I am in a position to guarantee that as WASV-TV's owner, Media General would continue its already proven commitment to first-rate service to the public, ensuring that WASV-TV grows to become an even stronger and more vital competitor in the market.


James A. Zimmerman

Signed this 11th day of July, 2001