

August 14, 2014

William Lake
Chief, Media Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re: Proposed Assignment of KPEJ-TV, Odessa, TX (Fac. ID No. 12524);
KMSS-TV, Shreveport, LA (Fac. ID No. 12525); and KLJB(TV), Quad
Cities, IL (Fac. ID No. 54011) to Marshall Broadcasting Group, Inc.**

Dear Mr. Lake,

In connection with the proposed assignment of broadcast stations KPEJ-TV, Odessa, TX; KMSS-TV, Shreveport, LA; and KLJB(TV), Quad Cities, IL (the "Stations") to my company Marshall Broadcasting Group, Inc. ("MBG"), and in response to requests from Media Bureau staff, this letter contains additional information regarding: (1) my prior efforts to obtain financing for the acquisition of media properties; (2) the anticipated number of employees each Station will employ post-assignment; (3) a weekly public affairs program focused on Black America that will air on the Stations; and (4) my personal financial stake in MBG, the proposed assignee and licensee of the Stations.

I. Financing

I have attempted to obtain financing to acquire broadcast and newspaper properties on numerous occasions over the past three decades. Each time, lenders put forth a myriad of reasons why they could not extend such financing. For example, while working as vice president and general manager at WLBM-TV in Meridian, Mississippi in the late 1980s, I approached several lenders in an attempt to finance the \$4 million purchase price of a full power AM/FM radio combination in Jackson, Mississippi. Each time I was rebuffed – lenders refused to extend the necessary financing based upon my inexperience as a broadcast station owner, an unwillingness to fund a "one-off" acquisition, and the small size of the Jackson, Mississippi market. Not long thereafter, I again attempted to purchase a group of radio stations, this time in Bryan/College Station, Texas. In an effort to fund the \$6 million purchase price, I sought financing from a variety of lenders, including . As was the case in my attempted Mississippi radio purchase, these lenders refused to provide the necessary financing, again citing reasons such as my lack of experience as a station owner. A similar story unfolded in the early 2000s when I attempted to purchase the Sengstacke Newspaper Group, which consisted of four newspapers in Chicago and Detroit, for \$13 million, and in 2008 when I sought to acquire one or more television stations from Media General. The list of lenders I have approached over the years is lengthy and includes both institutional lenders and private equity firms, among them:

Marshall Broadcasting Group, Inc. | 3731 Wilshire Blvd. Suite 840 Los Angeles, CA 90010
213-835-1500 voice | Pluria@me.com

My experience aptly demonstrates that banks are unwilling to finance new television entrants with modest assets and a lack of an operational track record. Without the credit support of an established media company such as Nexstar, it is unlikely that MBG will be able to finance the acquisition of the Stations.

II. Employees

Following FCC approval of the proposed assignments, I anticipate that MBG will employ at least ten full-time employees at KLJB(TV), six full-time employees at KMSS-TV, and six full-time employees at KPEJ-TV. These numbers are targets, and may change over time depending upon the operational needs and financial health of the Stations. MBG will, however, make every effort to maintain employees at or above these levels for as long as it owns the Stations.

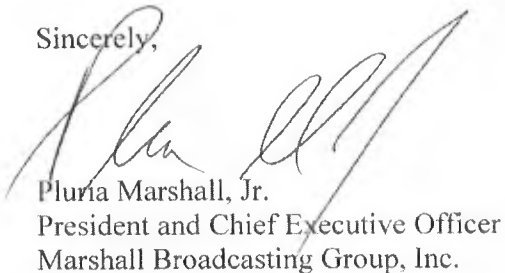
III. Public Affairs Program

Upon its purchase of the Stations, MBG plans to produce a 30-minute weekly news and current affairs program called "News in Black." The program will focus on contemporary political, economic and sociopolitical topics from throughout Black America. Patterned after such political affairs shows as "Meet The Press" and "Face The Nation," the program will provide Black news to consumers with compelling content and analysis that helps them live more informed, more empowered and more fulfilled lives. The program will air on the Stations and be offered to Nexstar for broadcast on its stations, which would give it an audience in larger markets with a sizeable minority presence such as Memphis and Little Rock. I have enclosed a summary of the program containing additional details.

IV. Personal Financial Investment

Finally, I am attaching a copy of MBG's May 2014 term sheet with Nexstar concerning the proposed transaction. This term sheet details my personal financial stake in MBG. As further specified in the term sheet, I anticipate that my initial investment in MBG will be _____ which will represent 100% of MBG's equity. I will also hold 100% of MBG's voting rights.

Sincerely,



Pluria Marshall, Jr.
President and Chief Executive Officer
Marshall Broadcasting Group, Inc.

Enclosures

NEWS IN BLACK

A Weekly Newsmagazine

“News in Black” is a news and current affairs program that focuses on contemporary political, economic and sociopolitical topics from throughout Black America. Patterned after such political affairs shows as “Meet The Press” and “Face The Nation,” the program will provide Black news consumers with compelling content and analysis that helps them live more informed, more empowered and more fulfilled lives.

Anchored by pair of dynamic co-hosts, the 60-minute show will dissect and evaluate news and events for the previous and upcoming weeks and provide consumers with detailed context, perspective and news analysis.

The show’s format will be as follows:

- Week in Review: Summary of the week’s news
- Spotlight: Q&A with lead newsmaker(s) of the week
- Panel discussion evaluating week’s news
- Week in Preview: Summary of week’s upcoming news
- Guest Commentary: One wo/man’s perspective

To capture a strong and loyal audience, producers will work closely with the leading black elected officials, business leaders, industry experts, newsmakers and organization executives to cultivate a program that meets the news and information needs of black news consumers.

Marshall Broadcasting Company will produce the show from studios in Washington, D.C., starting in the 2014 Fall TV season. The show will be syndicated to network executives throughout the nation, especially to those executives in the Top 50 Black markets in the U.S. It also will be offered to networks that serve news consumers in large black markets outside the U.S.

- August 7, 2014