

**EXHIBIT NO. 16**  
**FCC Form 314**  
**Section III, Question 7(b)**  
**Harris Broadcasting Company (Permittee)**  
**Valley Broadcasting Company (Assignee)**  
**KBJN, Ch. 3, Ely, Nevada**

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**Section III, Question 7(b):**                      **Character Issues of Assignee**

On December 17, 1999, the Post Company ("Post"), licensee of station KIFI-TV, Idaho Falls, Idaho, filed a petition with the Federal Communications Commission ("Commission") to deny or revoke licenses from Oregon Trail Broadcasting Company ("Oregon Trail"), licensee of KPVI(TV), Pocatello, Idaho, and Two Ocean Broadcasting Company ("Two Ocean"), licensee of KJWY(TV), Jackson, Wyoming ("Petition"). Oregon Trail and Two Ocean are both wholly owned subsidiaries of Sunbelt Communications Company ("Sunbelt"), the 100% shareholder of Valley Broadcasting Company ("Valley"). The Petition claims that Sunbelt, Two Ocean and Oregon Trail have abused the Commission's ownership rules and its familial attribution policies. The Petition was filed in connection with the pending application of Meridian Communications of Idaho, Inc. (formerly Meridian Communications Company) for a new television station, channel 20, Idaho Falls, Idaho. These are the same claims also made in Post's Petition to Deny, dated June 7, 1995, filed against the application of Sunbelt Broadcasting Company (now Sunbelt Communications Company) to acquire the licenses of Stations KPVI(TV), KXTF(TV) and KJWY(TV). These claims, alleging family attribution of Sunbelt's interests held by James E. Rogers to his children, the owners of Meridian Communications of Idaho, Inc., were summarily rejected by the Chief of the Video Services Division in a letter dated September 29, 1995. Unfortunately, the FCC staff did not and has not addressed these same issues in Post's petition filed against Meridian Communications of Idaho, Inc.'s original applications and now repeated in its Supplemental filing on December 17, 1999. Sunbelt, Two Ocean and Oregon Trail have filed oppositions to the Petition denying each and every allegation contained therein. The matter remains unresolved.

Given the repetitive nature of issues long resolved in a corollary proceeding involving the Pocatello-Idaho Falls, Idaho market, Valley respectfully submits that these issues in a wholly unrelated market should have no impact on the grant of this application.