

Explanation of Response to Section III, Question 4

The instant application seeks Commission consent to a pro forma transfer of control of Commission licensee, KSLS, Inc. Specifically, the application reflects the insertion of Citigroup Holdings Company as a wholly owned subsidiary of Citigroup Inc. in the corporate structure of the licensee. Accordingly, the instant transaction is pro forma in nature. Because the instant application merely describes this restructuring, there are no written agreements for Sale/Transfer of the station.