

**Comprehensive Exhibit 15**  
**Description of Transaction, Agreements,**  
**Parties To Application, and Other Media Interests**

This and six other contemporaneously-filed applications seek consent of the Federal Communications Commission to the transfer of control of the broadcast license subsidiaries of Communications Corporation of America, Debtor-in-Possession (the "Company"), from the Shareholders of the Company to SP ComCorp LLC ("SP ComCorp"). The Company is the corporate parent of the full-power and Class A television stations ("ComCorp Stations") and licensees listed below.

<i>Licensee</i>	<i>Call Sign</i>	<i>Facility ID</i>	<i>Community of License</i>
ComCorp of Texas License Corp.	KMSS-TV	12525	Shreveport, LA
ComCorp of Texas License Corp.	KVEO(TV)	12523	Brownsville, TX
ComCorp of Texas License Corp.	KWKT(TV)	12522	Waco, TX
ComCorp of Bryan License Corp.	KYLE(TV) <sup>1</sup>	60384	Bryan, TX
ComCorp of Baton Rouge License Corp.	WGMB(TV)	12520	Baton Rouge, LA
ComCorp of Baton Rouge License Corp.	WBRL-CA	24976	Baton Rouge, LA
ComCorp of El Paso License Corp.	KTSM-TV	67760	El Paso, TX
ComCorp of Indiana License Corp. <sup>2</sup>	WEVV(TV)	72041	Evansville, IN
ComCorp of Tyler License Corp.	KETK-TV	55643	Jacksonville, TX
ComCorp of Louisiana License Corp.	KADN(TV)	33261	Lafayette, LA
ComCorp of Texas License Corp.	KPEJ(TV)	12524	Odessa, TX

<sup>1</sup> KYLE historically has operated as a satellite of KWKT. The transferee requests a main studio waiver in Exhibit 18 to the KYLE transfer application.

<sup>2</sup> ComCorp of Indiana, Inc., which is the sole shareholder of ComCorp of Indiana License Corp., holds a 49% general partnership interest in Evansville Low Power Partnership, which is the licensee of WTSN-LP, Evansville, Indiana (Facility ID 20030). A separate *pro forma* application will be filed by Evansville Low Power Partnership with respect to the transfer of control described herein.

**Background.** The Company and its subsidiaries (collectively, the “Debtors”) currently are operating their businesses in the ordinary course as debtors-in-possession under the jurisdiction of the Bankruptcy Court and in accordance with applicable provisions of the Bankruptcy Code.

On June 8, 2006, the Company and its non-license subsidiaries filed voluntary petitions in the United States Bankruptcy Court for the Western District of Louisiana seeking relief under the provisions of Chapter 11 of Title 11 of the United States Code (Case No. 06-50410). On August 10, 2006, the licensees of the ComCorp Stations filed involuntary *pro forma* transfer of control applications with the FCC to reflect the change in the Company’s legal status, which the Commission granted on August 29, 2006.

On July 11, 2007, the license subsidiaries of the Company filed voluntary petitions in the United States Bankruptcy Court for the Western District of Louisiana seeking relief under the provisions of Chapter 11 of Title 11 of the United States Code (consolidated with Case No. 06-50410). On July 13, 2007, the license subsidiaries submitted involuntary *pro forma* transfer of control applications with the FCC to reflect the change in their status.

**The Reorganization Plan.** The Debtors intend to complete their proposed financial restructuring (the “Restructuring”) pursuant to a Plan of Reorganization (the “Plan”), which was filed on July 11, 2007, with the Bankruptcy Court as Exhibit 1 to their Disclosure Statement. Completion of the proposed Restructuring is subject to a number of conditions, including, without limitation, completion of certain definitive documentation, receipt of formal approval of the Plan from certain debt holders and the Bankruptcy Court, and the FCC’s consent to this and other simultaneously filed long-form transfer of control applications.

The holders of the Company’s first lien senior secured claims arising under its existing first lien credit agreement (the “Secured Claims”), representing 100 percent of the aggregate amount of the Secured Claims, pre-negotiated the Plan with the Company to protect the ComCorp Stations’ operations, allow for an orderly reorganization of the Debtors, and recapitalize the Debtors by de-leveraging their balance sheets. The Plan should expedite the Debtors’ emergence from Chapter 11, which will benefit the ComCorp Stations by returning them to “normal course” operations.

Under the Plan, the Company’s pre-petition preferred stockholders’ and common stockholders’ equity interests in the Company will be cancelled on the effective date of the Plan (the “Closing”). At that time, the holders of the Secured Claims will exchange their Secured Claims in the Company for approximately 97 percent of the voting equity in a newly reorganized, privately held company (“Reorganized ComCorp”).<sup>3</sup> SP ComCorp will hold approximately 75 percent of Reorganized ComCorp’s voting equity. As such, SP ComCorp will be the single majority shareholder of Reorganized ComCorp, thereby making all other voting shareholders non-attributable.

The Plan also provides for the holders of the Secured Claims and/or their respective affiliates, successors, and assigns to enter into a new credit and guaranty agreement (“Credit Agreement”) at the Closing with reorganized ComCorp Broadcasting, Inc. (“CCB”). The obligations of CCB under the Credit Agreement will be supported by guaranties by the parents and subsidiaries of CCB and by

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<sup>3</sup> Certain employees of Reorganized ComCorp also will receive time/performance-based options to acquire an additional amount of Reorganized ComCorp’s voting equity. Provided that SP ComCorp remains the single majority shareholder of Reorganized ComCorp at the time of exercise, these interests would not become attributable when exercised by their holders.

a lien on substantially all assets of CCB, its parents, and its subsidiaries (other than the FCC licenses). The Credit Agreement obligations of CCB also will be supported by a separate guaranty by reorganized White Knight Holdings, Inc. and its subsidiaries (the "WK Guaranty"), third parties to which subsidiaries of CCB will continue to provide sales and certain other services following the Closing, and by a lien on substantially all assets of such companies (other than the FCC licenses). The Commission has concluded that loan guarantees are not attributable. *See Review of the Commission's Regulations Governing Attribution of Broadcast and Cable/MDS Interests, Memorandum Opinion and Order on Reconsideration, 16 FCC Rcd 1097, ¶¶ 31-32 (2001).* As a result, the WK Guaranty will not provide White Knight Holdings Corporation or its principal with an attributable interest in Reorganized ComCorp.

The Plan also provides, at the Closing, for the transfer of the new common stock of reorganized White Knight Broadcasting of Natchez, Inc. to CCB from White Knight Broadcasting, Inc., Debtor-In-Possession, which owns White Knight Broadcasting of Natchez License Corp., Debtor-In-Possession, which in turn is the licensee of WNTZ(TV), Natchez, Mississippi and associated translator and auxiliary stations. At that time, the names of White Knight Broadcasting of Natchez, Inc. and White Knight Broadcasting of Natchez License Corp., will change, respectively, to ComCorp of Alexandria, Inc. and ComCorp of Alexandria License Corp. The respective parties seek FCC consent to that transaction through a separate transfer of control application filed concurrently with this Application.

At and after the Closing, the Debtors will cease to operate as debtors-in-possession, and all broadcasting assets and operations of the Company (and its subsidiaries) will be fully vested in Reorganized ComCorp (and its subsidiaries). Other than the acquisition of the WNTZ entities as described in the prior paragraph, the Plan does not propose any changes to the existing structure of the Company's subsidiaries. *See Attachments I and II hereto.*

***Ownership Structure.*** The Plan proposes a seven-member Board of Directors of Reorganized ComCorp. Initially, SP ComCorp will appoint all seven Directors, which will include the Chief Executive Officer of Reorganized ComCorp. After the Closing, a non-attributable minority investor in Reorganized ComCorp will have the right to nominate a candidate to replace one of the Directors initially appointed by SP ComCorp. This nominee's election to the Board of Directors will require the affirmative vote of a majority of Reorganized ComCorp's voting equity holders. As such, SP ComCorp effectively will have the right to accept or reject this nomination of a replacement director at its discretion. Reorganized ComCorp's governing documents will permit the Board to meet and conduct business in the event of a vacancy in a director position. In the event of a vacancy of a director position, SP ComCorp will have the right to appoint a director to fill such vacancy.

Attachment III hereto is a chart of the ownership of SP ComCorp LLC. Attachment IV hereto identifies the ownership of Reorganized ComCorp. and, accordingly, the parties and entities who will hold attributable interests in Reorganized ComCorp. As depicted in those Attachments, the sole voting Member and sole Manager of SP ComCorp will be SP ComCorp Investments LLC. SP ComCorp will be governed by a Board of Directors appointed by SP ComCorp Investments LLC. The individuals and entities that will own the Members of SP ComCorp will be certain of the Debtors' Secured Claims' holders and/or their respective affiliates, successors, and assigns. All such persons or entities that will have any material involvement in the management or operation of SP ComCorp are disclosed in this Exhibit. All other such persons and entities will be subject to insulation under the Commission's policies (*i.e.*, pursuant to insulation provisions in the LLC agreements of the non-voting Members of SP ComCorp).

**Other Media Interests.** No party to this Application has an attributable ownership interest in any media serving the same markets that are served by the ComCorp Stations other than the interests in Reorganized ComCorp as disclosed in this Application.

Certain parties to this Application have attributable ownership interests in media serving other markets, however. In particular, the individuals and entities that will own the Manager and Members of SP ComCorp and certain of the individuals who will serve as Directors of SP ComCorp hold attributable ownership interests in SP Granite LLC, the single majority shareholder of Granite Broadcasting Corporation, which is the corporate parent of the television stations and licensees listed below:

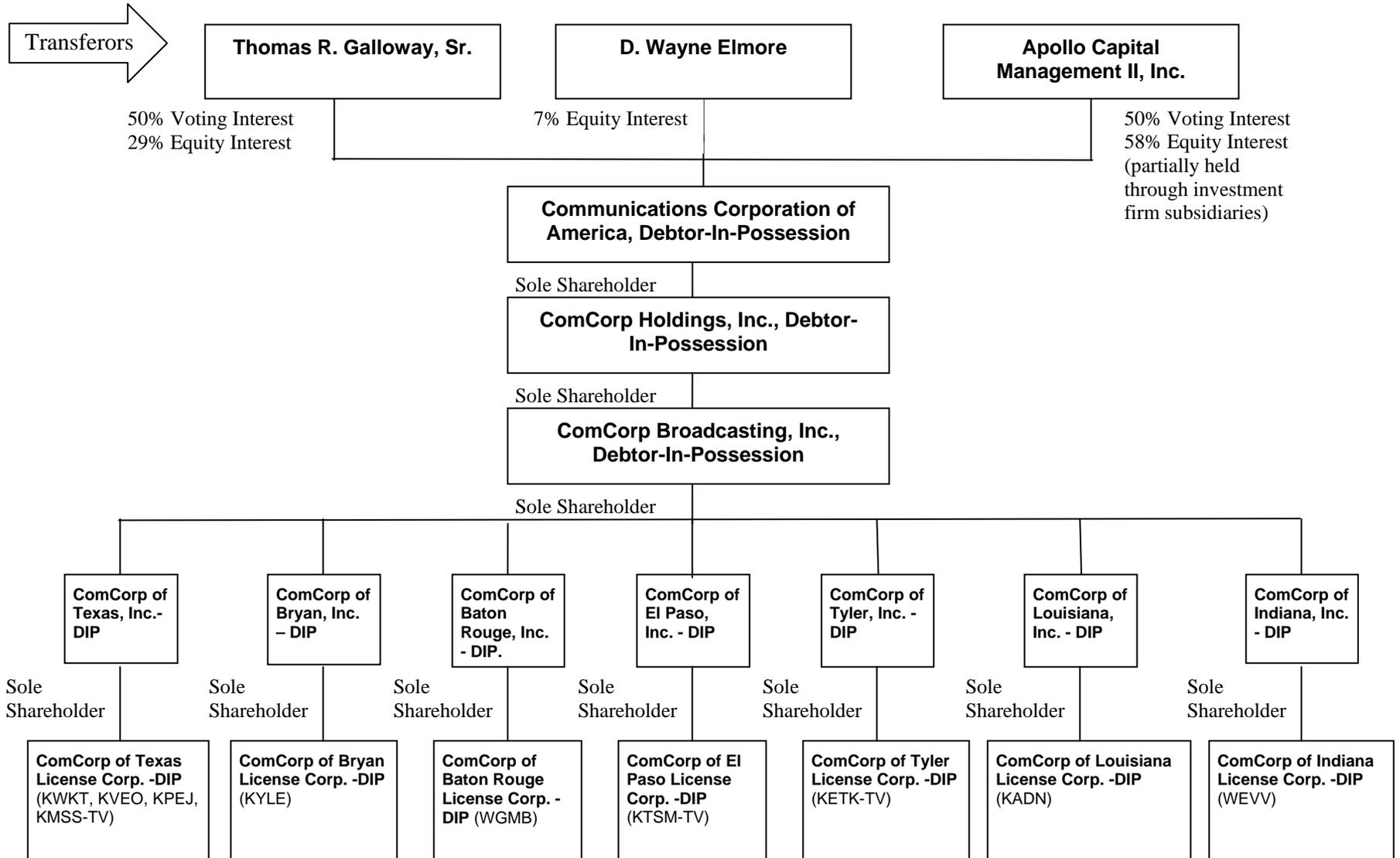
<i>Licensee</i>	<i>Call Sign</i>	<i>Facility ID</i>	<i>Community of License</i>
WXON License, Inc.	WMYD(TV)	74211	Detroit, MI
WBNG License, Inc.	WBNG-TV	23337	Binghamton, NY
KBWB License, Inc.	KBWB(TV)	51189	San Francisco, CA
KBJR License, Inc.	KBJR-TV	33658	Superior, WI
Channel 11 License, Inc.	KRII(TV)	82698	Chisholm, MN
WEEK-TV License, Inc.	WEEK-TV	24801	Peoria, IL
KSEE License, Inc.	KSEE(TV)	35594	Fresno, CA
WISE-TV License, LLC	WISE-TV	13960	Fort Wayne, IN
WKBW-TV License, Inc.	WKBW-TV	54176	Buffalo, NY
WTVH License, Inc.	WTVH(TV)	74151	Syracuse, NY

**Filing of Agreements.** Attached to Exhibit 13 of the lead long-form application (KMSS-TV, BTCCT-20070717\_\_\_) and incorporated herein by reference are the Disclosure Statement and the Plan. The Table of Contents to the Disclosure Statement identifies the Exhibits attached to the version submitted to the Bankruptcy Court. The parties are not submitting the Exhibits to the Disclosure Statement (other than the Plan, which is Exhibit 1 thereto) or the other agreements between and among the parties hereto. The omitted material is voluminous, mostly available to the public through the Bankruptcy Court, and not germane to the Commission's evaluation of this Application and therefore need not be produced at this time. *See LUJ, Inc.*, 17 FCC Rcd 16980 (2002); *Public Notice*, DA 02-2049 (rel. Aug. 22, 2002). Information contained in the omitted materials will be provided to the Commission upon request, subject to the parties' rights, where appropriate, to submit such information subject to regulations restricting public access to confidential and proprietary information.

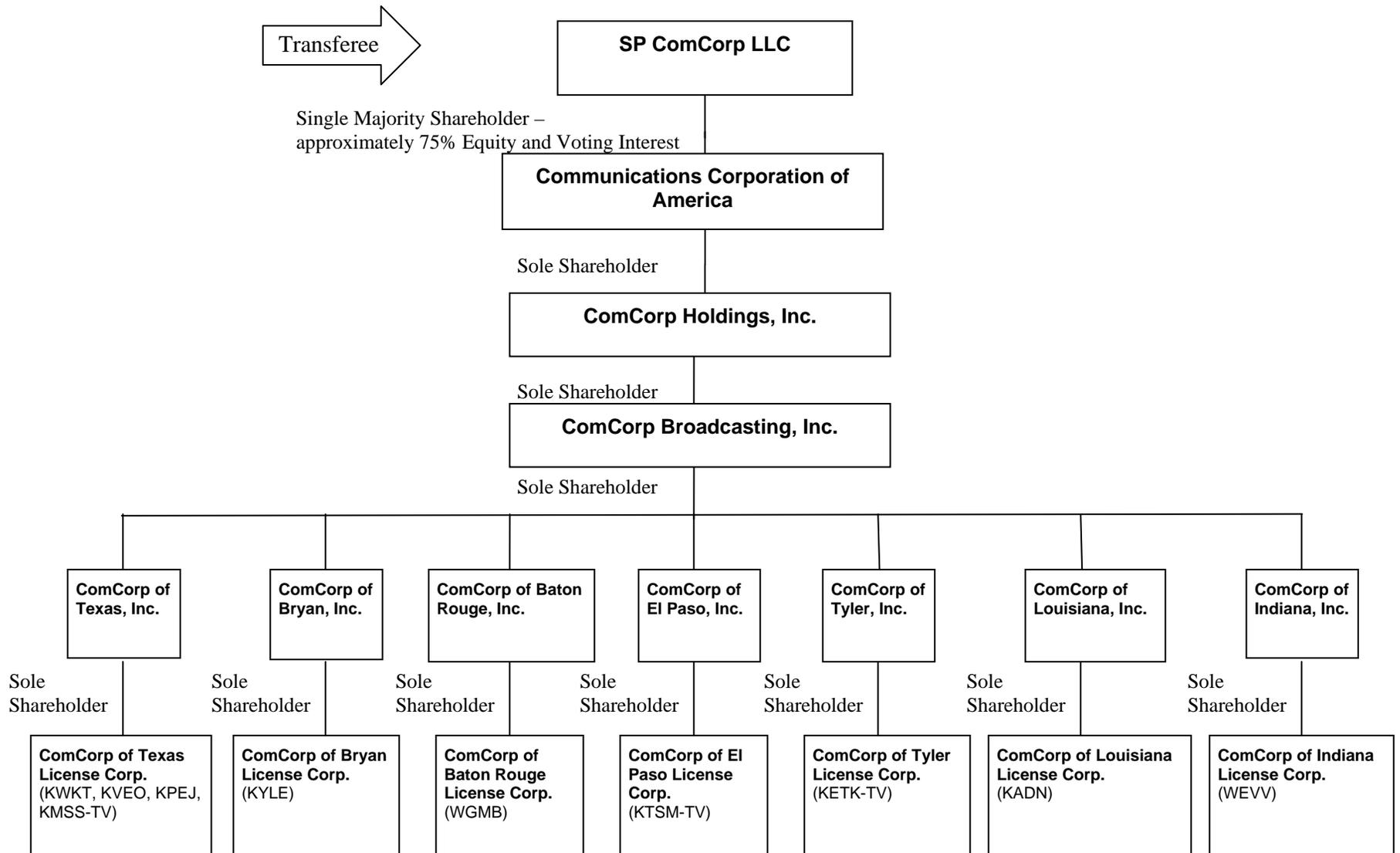
**Pending Renewal Applications.** All of the ComCorp Stations are the subject of pending applications for renewal of license. The parties therefore request that the Commission apply its policy permitting processing of multi-station transfer of control applications that involve a subset of stations with pending renewal applications where (1) no basic qualifications issues against the transferor and transferee were raised or, if raised, were resolved favorably, and (2) the transferee explicitly assents to standing in the stead of the transferor in any renewal proceeding that is pending at the time of consummation of the transfer of control. *See, e.g., Shareholders of CBS Corporation*, 16 FCC Rcd 16072, ¶ 3 (2001).

The Transferee hereby agrees to succeed to the position of the Transferors in any pending renewal applications, and assume the consequences therein, consistent with the procedures set forth in *Shareholders of CBS Corporation*.

**ATTACHMENT I: CURRENT OWNERSHIP CHART**

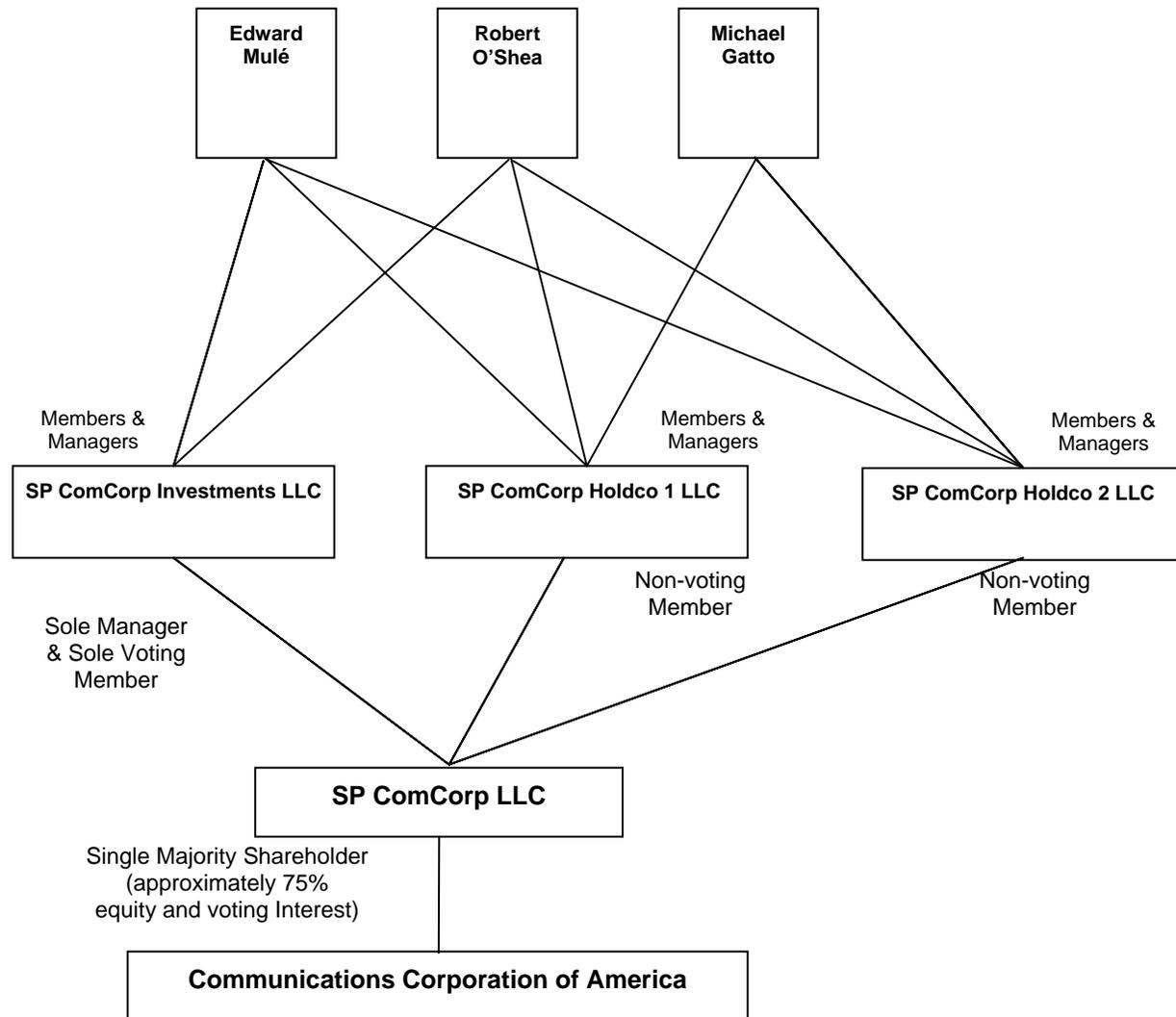


**ATTACHMENT II: POST-REORGANIZATION OWNERSHIP CHART\***



\* A separate FCC application seeks consent to the transfer of control of White Knight Broadcasting of Natchez, Inc. to ComCorp. Broadcasting, Inc. pursuant to the Plan, as described *supra*.

**ATTACHMENT III: SP COMCORP LLC OWNERSHIP CHART**



**ATTACHMENT IV:**

**Ownership Structure of each ComCorp license subsidiary  
 (each as reorganized)**

<b>Name &amp; Address</b>	<b>Citizenship</b>	<b>Positional Interest</b>	<b>Percentage of Votes</b>	<b>Percentage of Total Assets</b>
[ComCorp license subsidiary] <sup>4</sup> (as reorganized) P.O. Box 53708 Lafayette, LA 70505	U.S. (Delaware Corp.)	--	--	--
[ComCorp station operating subsidiary] <sup>5</sup> (as reorganized) P.O. Box 53708 Lafayette, LA 70505	U.S. (Delaware Corp.)	Sole Shareholder	100%	100%
Steve Pruett P.O. Box 53708 Lafayette, LA 70505	U.S.	Chief Executive Officer and Director	0%	0%
John Kneisley Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%
Peter Markham Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%

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<sup>4</sup> ComCorp of Texas License Corp.; ComCorp of Bryan License Corp.; ComCorp of Baton Rouge License Corp.; ComCorp of El Paso License Corp.; ComCorp of Tyler License Corp.; ComCorp of Louisiana License Corp.; and ComCorp of Indiana, Inc.

<sup>5</sup> ComCorp of Texas, Inc.; ComCorp of Bryan, Inc.; ComCorp of Baton Rouge, Inc.; ComCorp of El Paso, Inc.; ComCorp of Tyler, Inc.; ComCorp of Louisiana, Inc.; and ComCorp of Indiana, Inc.

**Ownership Structure of each of ComCorp station operating subsidiary  
 (each as reorganized)**

<b>Name &amp; Address</b>	<b>Citizenship</b>	<b>Positional Interest</b>	<b>Percentage of Votes</b>	<b>Percentage of Total Assets</b>
[ComCorp station operating subsidiary] <sup>6</sup> (as reorganized) P.O. Box 53708 Lafayette, LA 70505	U.S. (Delaware Corp.)	--	--	--
ComCorp Broadcasting, Inc. (as reorganized) P.O. Box 53708 Lafayette, LA 70505	U.S. (Delaware Corp.)	Sole Shareholder	100%	100%
Steve Pruett P.O. Box 53708 Lafayette, LA 70505	U.S.	Chief Executive Officer and Director	0%	0%
John Kneisley Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%
Peter Markham Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%

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<sup>6</sup> ComCorp of Texas, Inc.; ComCorp of Bryan, Inc.; ComCorp of Baton Rouge, Inc.; ComCorp of El Paso, Inc.; ComCorp of Tyler, Inc.; ComCorp of Louisiana, Inc.; and ComCorp of Indiana, Inc.

**Ownership Structure of ComCorp Broadcasting, Inc.**  
**(as reorganized)**

<b>Name &amp; Address</b>	<b>Citizenship</b>	<b>Positional Interest</b>	<b>Percentage of Votes</b>	<b>Percentage of Total Assets</b>
ComCorp Broadcasting, Inc. (as reorganized) P.O. Box 53708 Lafayette, LA 70505	U.S. (Delaware Corp.)	--	--	--
ComCorp Holdings, Inc. (as reorganized) P.O. Box 53708 Lafayette, LA 70505	U.S. (Delaware Corp.)	Sole Shareholder	100%	100%
Steve Pruett P.O. Box 53708 Lafayette, LA 70505	U.S.	Chief Executive Officer and Director	0%	0%
John Kneisley Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%
Peter Markham Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%

**Ownership Structure of ComCorp Holdings, Inc.**  
**(as reorganized)**

<b>Name &amp; Address</b>	<b>Citizenship</b>	<b>Positional Interest</b>	<b>Percentage of Votes</b>	<b>Percentage of Total Assets</b>
ComCorp Holdings, Inc. (as reorganized) P.O. Box 53708 Lafayette, LA 70505	U.S. (Delaware Corp.)	--	--	--
Communications Corporation of America (as reorganized) P.O. Box 53708 Lafayette, LA 70505	U.S. (Delaware Corp.)	Sole Shareholder	100%	100%
Steve Pruett P.O. Box 53708 Lafayette, LA 70505	U.S.	Chief Executive Officer and Director	0%	0%
John Kneisley Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%
Peter Markham Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%

**Ownership Structure of Communications Corporation of America**  
**(as reorganized)<sup>7</sup>**

<b>Name &amp; Address</b>	<b>Citizenship</b>	<b>Positional Interest</b>	<b>Percentage of Votes</b>	<b>Percentage of Total Assets</b>
Communications Corporation of America (as reorganized) P.O. Box 53708 Lafayette, LA 70505	U.S. (Delaware Corp.)	Ultimate Parent of Licensees	--	--
Harry Wilson Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%
David Sawyer Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%
John Kneisley Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%
Peter Markham Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%
Zubin Jariwala Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%
Thomas Shen Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%
Steve Pruett P.O. Box 53708 Lafayette, LA 70505	U.S.	Chief Executive Officer and Director	0%	0%
SP ComCorp LLC Two Greenwich Plaza Greenwich, CT 06830	U.S. (Delaware LLC)	Single Majority Shareholder	approx. 75%	approx. 75%

<sup>7</sup> See description of Board of Directors on page 2 of this Exhibit.

**Ownership Structure of SP ComCorp LLC**

<b>Name &amp; Address</b>	<b>Citizenship</b>	<b>Positional Interest</b>	<b>Percentage of Votes</b>	<b>Percentage of Total Assets</b>
SP ComCorp LLC Two Greenwich Plaza Greenwich, CT 06830	U.S. (Delaware LLC)	---	---	---
SP ComCorp Investments LLC Two Greenwich Plaza Greenwich, CT 06830	U.S. (Delaware LLC)	Member and Manager	100%	Less than 1%
SP ComCorp Holdco 1 LLC Two Greenwich Plaza Greenwich, CT 06830	U.S. (Delaware LLC)	Member	0%	approx. 99%
SP ComCorp Holdco 2 LLC Two Greenwich Plaza Greenwich, CT 06830	U.S. (Delaware LLC)	Member	0%	approx. 1%
Edward Mulé Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%
Robert O'Shea Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%
Michael Gatto Two Greenwich Plaza Greenwich, CT 06830	U.S.	Director	0%	0%

**Ownership Structure of SP ComCorp Investments LLC**

<b>Name &amp; Address</b>	<b>Citizenship</b>	<b>Positional Interest</b>	<b>Percentage of Votes</b>	<b>Percentage of Total Assets</b>
SP ComCorp Investments LLC Two Greenwich Plaza Greenwich, CT 06830	U.S. (Delaware LLC)	---	---	---
Edward Mulé Two Greenwich Plaza Greenwich, CT 06830	U.S.	Member and Manager	50%	50%
Robert O'Shea Two Greenwich Plaza Greenwich, CT 06830	U.S.	Member and Manager	50%	50%

**Ownership Structure of SP ComCorp Holdco 1 LLC\***

<b>Name &amp; Address</b>	<b>Citizenship</b>	<b>Positional Interest</b>	<b>Percentage of Votes</b>	<b>Percentage of Total Assets</b>
SP ComCorp Holdco 1 LLC Two Greenwich Plaza Greenwich, CT 06830	U.S. (Delaware LLC)	---	---	---
Edward Mulé Two Greenwich Plaza Greenwich, CT 06830	U.S.	Member and Manager	40%	Less than 1%
Robert O'Shea Two Greenwich Plaza Greenwich, CT 06830	U.S.	Member and Manager	40%	Less than 1%
Michael Gatto Two Greenwich Plaza Greenwich, CT 06830	U.S.	Member and Manager	20%	Less than 1%

\* Insulated Members own approximately 100% of the Total Assets but have no voting interests in this entity.

**Ownership Structure of SP ComCorp Holdco 2 LLC\***

<b>Name &amp; Address</b>	<b>Citizenship</b>	<b>Positional Interest</b>	<b>Percentage of Votes</b>	<b>Percentage of Total Assets</b>
SP ComCorp Holdco 2 LLC Two Greenwich Plaza Greenwich, CT 06830	U.S. (Delaware LLC)	---	---	---
Edward Mulé Two Greenwich Plaza Greenwich, CT 06830	U.S.	Member and Manager	40%	Less than 1%
Robert O'Shea Two Greenwich Plaza Greenwich, CT 06830	U.S.	Member and Manager	40%	Less than 1%
Michael Gatto Two Greenwich Plaza Greenwich, CT 06830	U.S.	Member and Manager	20%	Less than 1%

\* Insulated Members own approximately 100% of the Total Assets but have no voting interests in this entity.