

Exhibit 2
FCC Form 316
Section I, Paragraph 4(b)

Raycom Media, Inc. (“Raycom”) owns, through various indirectly-owned licensee subsidiaries, 33 full-power television stations (including three satellite stations). Through the instant application and 28 companion FCC Form 316 applications, Raycom seeks approval to implement a *pro forma* internal corporate reorganization to realign its corporate structure to facilitate financing transactions. The instant application seeks FCC consent to the *pro forma* assignment of license of television station KASA-TV, Santa Fe, New Mexico, including its 37 TV Translators (“Stations”) from one indirectly-owned licensee subsidiary of Raycom to a new indirectly-owned license subsidiary of Raycom.

As reflected in the Annex A “Before” diagram, the Stations are currently licensed to Raycom National License Subsidiary, LLC, a Delaware LLC. Its sole member is Raycom National, LLC, a Delaware LLC. The sole member of Raycom National, LLC is Raycom America, Inc., a Delaware corporation. It is a wholly owned subsidiary of Raycom TV Broadcasting, Inc. (a Delaware corporation), a first tier subsidiary of Raycom.

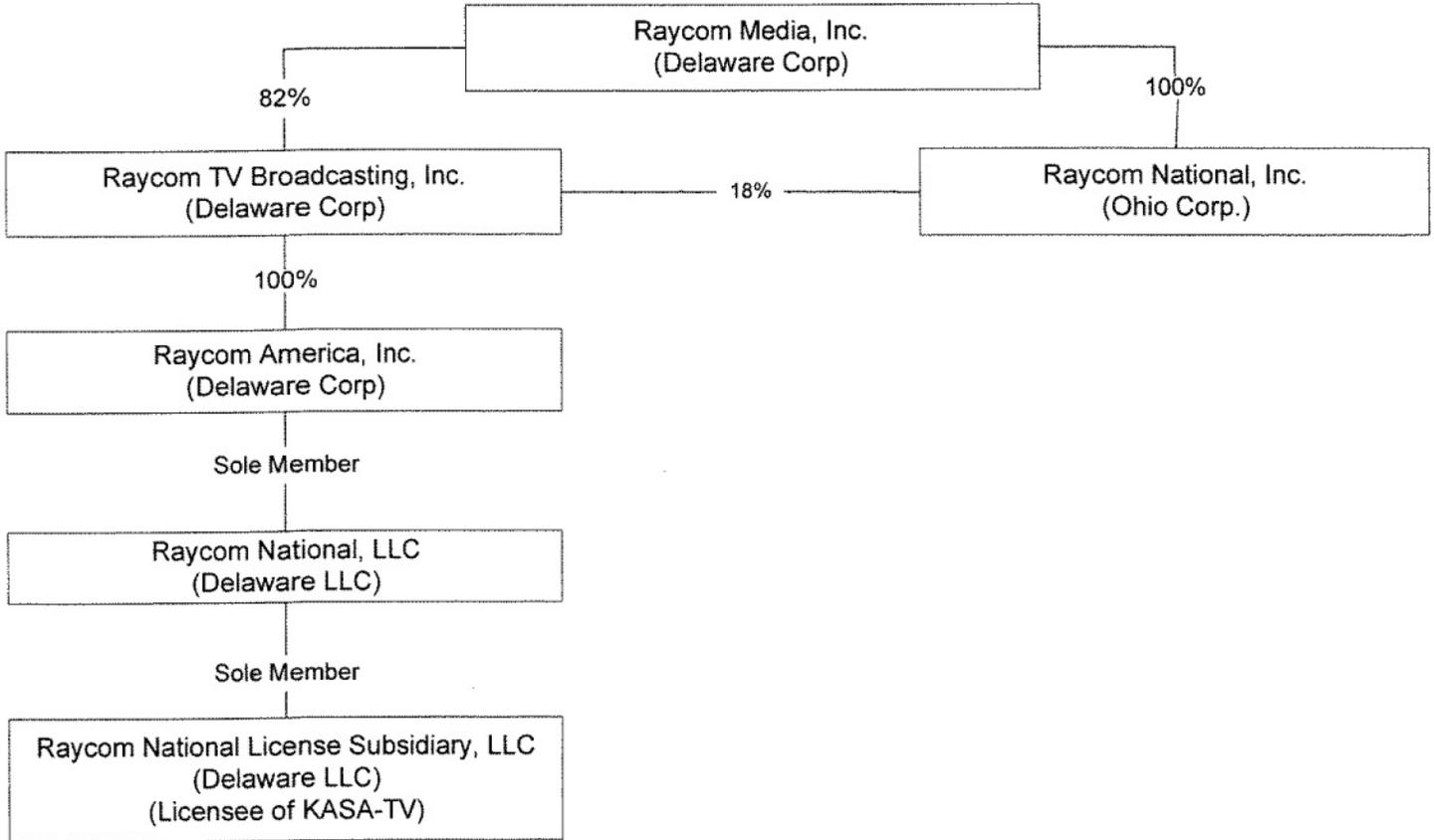
As reflected in the Annex B “After” diagram, following the corporate reorganization, the Stations will be licensed to KASA License Subsidiary, LLC, a newly-created Delaware LLC whose sole member will be KASA Holdings, LLC, a newly-created Delaware LLC. Its sole member will be Raycom Holdings, LLC, a newly-created Delaware LLC. The sole member of Raycom Holdings, LLC will be Raycom TV Broadcasting, Inc., the existing first tier subsidiary of Raycom. While interim steps in the reorganization involve *pro forma* transfers of control of intermediate entities in the Raycom corporate structure,

Section II Question 2 designates this application as one for assignment of license (rather than transfer of control) because the final step in the reorganization will be the *pro forma* assignment of license of the Station from Raycom's existing indirectly-owned subsidiary Raycom National License Subsidiary, LLC to Raycom's newly-formed, indirectly-owned subsidiary KASA License Subsidiary, LLC.

Because the proposed transaction involves a corporate reorganization which does not involve any substantial change in the beneficial ownership of the corporation, it is properly the subject of FCC Form 316. *See* Section 73.3540(f)(4).¹

¹ As a *pro forma* corporate reorganization, there is no consideration involved in this transaction.

ANNEX A "Before"



ANNEX B "After"

