

FCC Form 314  
Section III, Question 8  
Exhibit 22

Character Issues

In connection with the pending license renewal applications of stations KHNL(TV) and KGMB(TV), Honolulu, Hawai'i (the "Hawai'i Stations"),<sup>1</sup> Media Council Hawai'i ("MCH") alleges that Raycom displayed a "lack of candor" by not disclosing on the Hawai'i Stations' renewal applications that MCH raised character allegations against Raycom in connection with the pending application to transfer control of KFVE(TV) from its current licensee, HITV License Subsidiary, Inc. ("HITV"), to Southeastern Media Holdings, Inc. ("Southeastern").<sup>2</sup> As explained in Raycom's Opposition, Raycom is neither a party to, nor a holder of any interest in, the KFVE transfer application. Allegations raised by MCH against Raycom in the KFVE transfer proceeding or in other pleadings unconnected with any license application were not reportable in the Hawai'i Stations' license renewal applications. Further, MCH's allegation relies on the incorrect assertion that a non-attributable Shared Services Agreement between Raycom and HITV gives Raycom a cognizable interest in KFVE.<sup>3</sup>

In its Reply in support of its Petition to Deny the Hawai'i Stations' license renewal applications, MCH alleged Raycom also lacked candor by inaccurately describing in its Opposition a communication between the Hawai'i Stations and a party supporting the MCH Petition to Deny. Upon investigating MCH's claim, Raycom acknowledged and explained the source of the inaccuracy — which was immaterial to the Hawai'i Stations' renewal applications — in a letter filed March 9, 2015.

In light of MCH's allegations, and out of an abundance of caution, Raycom has answered "No" on Section III, Question 7.<sup>4</sup>

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<sup>1</sup> See File Nos. BRC DT-20141001CEM and BRC DT-20141001CDU.

<sup>2</sup> See File No. BTCCDT-20131120AEP.

<sup>3</sup> MCH's Petition to Deny also attempts to make "character" issues out of the Media Bureau's admonishment of Raycom for a public file violation and amendments to the Raycom-HITV documents that were fully disclosed to the Commission.

<sup>4</sup> Raycom notes, however, that the Commission has held that even when "allegations of possible misconduct" are raised against an applicant, "no 'unresolved' issue is pending 'against' the applicant" — and thus no unresolved character issue must be reported in other applications — until "such allegations are determined to have merit and are designated for hearing." *Greater Muskegon Broadcasters, Inc.*, Mem. Op. & Order, 11 FCC Rcd 15464, 15472 (1996). See also *Coosa Valley News, Inc.*, Letter, 23 FCC Rcd 9146, 9148-49 (MB Aud. Div. 2008).