

FCC Form 315  
Section IV, Question 6  
EXHIBIT 16

**Parties to the Application**

The proposed transferees are indirect subsidiaries of TEGNA Inc. (“TEGNA”). Sander Operating Co. I will be owned by Belo Kentucky, Inc.; Sander Operating Co. III will be owned by King Broadcasting Company; and Sander Operating Co. V will be owned by KMSB-TV, Inc. Each transferee is in turn owned by Belo Holdings, Inc., which is owned by Belo Corp., a wholly-owned subsidiary of TEGNA. TEGNA is a publicly traded company. The following information is provided for persons with an attributable interest in the transferees:

Name and address  
Citizenship  
Positional Interest  
Percentage of votes  
Percentage of total equity<sup>1</sup>

**Belo Kentucky, Inc.**

Name and Address	Citizenship	Positional Interest	% of Votes	% of Total Equity
Belo Kentucky, Inc. c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	Kentucky corporation	Respondent	N/A	N/A
David T. Lougee c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Director and President	0%	0%
Gracia C. Martore c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Director and Vice President	0%	0%
Todd A. Mayman c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Secretary	0%	0%
Michael A. Hart c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Treasurer	0%	0%

<sup>1</sup> The percentage set forth in response to Section IV, Question 6 is the percentage of total equity (voting plus non-voting) held by each party to the application. No holder of debt or non-attributable equity will be an attributable party under the FCC’s “equity-debt plus” standard.

Name and Address	Citizenship	Positional Interest	% of Votes	% of Total Equity
Kevin Polchow c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Assistant Treasurer	0%	0%
Belo Holdings, Inc. c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	Delaware corporation	Shareholder	100%	100%

**KING Broadcasting Company**

Name and Address	Citizenship	Positional Interest	% of Votes	% of Total Equity
KING Broadcasting Company c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	Washington corporation	Respondent	N/A	N/A
David T. Lougee c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Director and President	0%	0%
Gracia C. Martore c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Director and Vice President	0%	0%
Doug Armstrong c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Vice President	0%	0%
Ray Heacox c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Vice President	0%	0%
RJ Meritt c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Vice President	0%	0%
Todd A. Mayman c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Secretary	0%	0%

Name and Address	Citizenship	Positional Interest	% of Votes	% of Total Equity
Michael A. Hart c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Treasurer	0%	0%
Kevin Polchow c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Assistant Treasurer	0%	0%
Belo Holdings, Inc. c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	Delaware corporation	Shareholder	100%	100%

**KMSB-TV, Inc.**

Name and Address	Citizenship	Positional Interest	% of Votes	% of Total Equity
KMSB-TV, Inc. c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	Arizona corporation	Respondent	N/A	N/A
David T. Lougee c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Director and President	0%	0%
Gracia C. Martore c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Director and Vice President	0%	0%
Todd A. Mayman c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Secretary	0%	0%
Michael A. Hart c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Treasurer	0%	0%
Kevin Polchow c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Assistant Treasurer	0%	0%

Name and Address	Citizenship	Positional Interest	% of Votes	% of Total Equity
Belo Holdings, Inc. c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	Delaware corporation	Shareholder	100%	100%

**Belo Holdings, Inc.**

Name and Address	Citizenship	Positional Interest	% of Votes	% of Total Equity
Belo Holdings, Inc. c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	Delaware corporation	Respondent	N/A	N/A
David T. Lougee c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Director and President	0%	0%
Gracia C. Martore c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Director and Vice President	0%	0%
Todd A. Mayman c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Secretary	0%	0%
Michael A. Hart c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Treasurer	0%	0%
Kevin Polchow c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Assistant Treasurer	0%	0%
Belo Corp. c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	Delaware corporation	Shareholder	100%	100%

**Belo Corp.**

Name and Address	Citizenship	Positional Interest	% of Votes	% of Total Equity
Belo Corp. c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	Delaware corporation	Respondent	N/A	N/A
Gracia C. Martore c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Director and President	0%	0%
David T. Lougee c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Director and Vice President	0%	0%
Todd A. Mayman c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Secretary	0%	0%
Michael A. Hart c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Treasurer	0%	0%
Kevin Polchow c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	U.S.	Assistant Treasurer	0%	0%
TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	Delaware corporation	Shareholder	100%	100%

**TEGNA Inc.**

Name and Address	Citizenship	Positional Interest	% of Votes	% of Total Equity
TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	Delaware corporation	Respondent	N/A	N/A
Marjorie Magner c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	Director (Chairman of the Board)	<1%	<1%
Howard D. Elias c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	Director	<1%	<1%

Name and Address	Citizenship	Positional Interest	% of Votes	% of Total Equity
Lidia Fonseca c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	Director	<1%	<1%
Jill Greenthal c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	Director	0%	0%
Gracia Martore c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	Director President and CEO	<1%	<1%
Scott K. McCune c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	Director	<1%	<1%
Henry McGee c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	Director	0%	0%
Susan Ness c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	Director	<1%	<1%
Bruce Nolop c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	Director	<1%	<1%
Neal Shapiro c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	Director	<1%	<1%
Victoria Harker c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	Executive Vice President and Chief Financial Officer	<1%	<1%
Todd Mayman c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	Executive Vice President and Chief Legal and Administrative Officer	<1%	<1%

Name and Address	Citizenship	Positional Interest	% of Votes	% of Total Equity
William Behan c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	Senior Vice President of Labor Relations	<1%	<1%
Kevin Lord c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	Chief Human Resources Officer	<1%	<1%
David Lougee c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	President of TEGNA Media	<1%	<1%
Jack Williams c/o TEGNA Inc. 7950 Jones Branch Dr. McLean, VA 22107	US	President of TEGNA Digital	<1%	<1%
Carl C. Icahn* c/o Icahn Capital LP 767 Fifth Avenue 47th Floor New York, NY 10153	US	Shareholder	6.63%*	6.63%*

\* On January 22, 2015, Carl C. Icahn and affiliated entities filed with the SEC updated information on their interests in TEGNA (then known as Gannett Co., Inc.) (Amendment No. 2 to Schedule 13D). The amended Schedule 13D identified certain parties that collectively at that time held approximately 6.63% of TEGNA's outstanding shares, and stated that "Mr. Icahn is in a position indirectly to determine the investment and voting decisions made by each of the" affiliated entities holding TEGNA shares.<sup>2</sup>

Defined terms used in these entities' January 22, 2015 filing (which is quoted below) are as follows:

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<sup>2</sup> On March 2, 2015, Mr. Icahn and affiliated entities filed Amendment No. 3 to Schedule 13D to disclose a letter agreement reached between the Icahn Group (as defined in the letter agreement) and Gannett Co., Inc., with respect to certain corporate governance provisions to be adopted by the new spin-off entity assuming the Gannett name and Gannett's publishing and digital assets (referred to as "SpinCo" in the letter agreement). Amendment No. 3 relates solely to the letter agreement; the amount and type of Mr. Icahn's interests in TEGNA have not changed since Mr. Icahn filed Amendment No. 2, to TEGNA's knowledge.

- TEGNA (formerly known as Gannett Co., Inc.) (“Corporation”)
- High River Limited Partnership (“High River”)
- Hopper Investments LLC (“Hopper”)
- Barberry Corp. (“Barberry”)
- Icahn Partners Master Fund LP (“Icahn Master”)
- Icahn Offshore LP (“Icahn Offshore”)
- Icahn Partners LP (“Icahn Partners”)
- Icahn Onshore LP (“Icahn Onshore”)
- Icahn Capital LP (“Icahn Capital”)
- IPH GP LLC (“IPH”)
- Icahn Enterprises Holdings L.P. (“Icahn Enterprises Holdings”)
- Icahn Enterprises G.P. Inc. (“Icahn Enterprises GP”)
- Beckton Corp. (“Beckton”)

The amended Schedule 13D stated in part:

“The principal business address of each of (i) High River, Icahn Offshore, Icahn Partners, Icahn Master, Icahn Onshore, Icahn Capital, IPH, Icahn Enterprises Holdings, Icahn Enterprises GP and Beckton is White Plains Plaza, 445 Hamilton Avenue - Suite 1210, White Plains, NY 10601, and (ii) Mr. Icahn, Barberry and Hopper is c/o Icahn Capital LP, 767 Fifth Avenue, 47th Floor, New York, NY 10153.

“Icahn Partners, Icahn Master and High River (collectively, the “Icahn Parties”) are entities controlled by Carl C. Icahn. Barberry is the sole member of Hopper, which is the general partner of High River. Icahn Offshore is the general partner of Icahn Master. Icahn Onshore is the general partner of Icahn Partners. Icahn Capital is the general partner of each of Icahn Offshore and Icahn Onshore. Icahn Enterprises Holdings is the sole member of IPH, which is the general partner of Icahn Capital. Beckton is the sole stockholder of Icahn Enterprises GP, which is the general partner of Icahn Enterprises Holdings. Carl C. Icahn is the sole stockholder of each of Barberry and Beckton. As such, Mr. Icahn is in a position indirectly to determine the investment and voting decisions made by each of the Icahn Parties. In addition, Mr. Icahn is the indirect holder of approximately 88.3% of the outstanding depositary units representing limited partnership interests in Icahn Enterprises L.P. (“Icahn Enterprises”). Icahn Enterprises GP is the general partner of Icahn Enterprises, which is the sole limited partner of Icahn Enterprises Holdings.

“The Icahn Parties are deemed to beneficially own, in the aggregate, 14,967,373 shares of common stock, \$1 par value, issued by Gannett Co., Inc. (the “Shares”), representing approximately 6.63% of the Corporation’s outstanding Shares (based upon the 225,830,862 Shares stated to be outstanding as of September 28, 2014 by the Corporation in the Corporation’s Quarterly Report on Form 10-Q for the quarterly period ended September 28, 2014, filed with the Securities and Exchange Commission on November 5,



2014).

“High River has sole voting power and sole dispositive power with regard to 2,993,477 Shares. Each of Hopper, Barberry and Mr. Icahn has shared voting power and shared dispositive power with regard to such Shares. Icahn Partners has sole voting power and sole dispositive power with regard to 7,112,394 Shares. Each of Icahn Onshore, Icahn Capital, IPH, Icahn Holdings, Icahn Enterprises GP, Beckton and Mr. Icahn has shared voting power and shared dispositive power with regard to such Shares. Icahn Master has sole voting power and sole dispositive power with regard to 4,861,502 Shares. Each of Icahn Offshore, Icahn Capital, IPH, Icahn Holdings, Icahn Enterprises GP, Beckton and Mr. Icahn has shared voting power and shared dispositive power with regard to such Shares.

“Each of Hopper, Barberry and Mr. Icahn, by virtue of their relationships to High River, may be deemed to indirectly beneficially own (as that term is defined in Rule 13d-3 under the Securities Exchange Act of 1934, as amended, the “Act”) the Shares which High River directly beneficially owns. Each of Hopper, Barberry and Mr. Icahn disclaims beneficial ownership of such Shares for all other purposes. Each of Icahn Offshore, Icahn Capital, IPH, Icahn Enterprises Holdings, Icahn Enterprises GP, Beckton and Mr. Icahn, by virtue of their relationships to Icahn Master, may be deemed to indirectly beneficially own (as that term is defined in Rule 13d-3 under the Act) the Shares which Icahn Master directly beneficially owns. Each of Icahn Offshore, Icahn Capital, IPH, Icahn Enterprises Holdings, Icahn Enterprises GP, Beckton and Mr. Icahn disclaims beneficial ownership of such Shares for all other purposes. Each of Icahn Onshore, Icahn Capital, IPH, Icahn Enterprises Holdings, Icahn Enterprises GP, Beckton and Mr. Icahn, by virtue of their relationships to Icahn Partners, may be deemed to indirectly beneficially own (as that term is defined in Rule 13d-3 under the Act) the Shares which Icahn Partners directly beneficially owns. Each of Icahn Onshore, Icahn Capital, IPH, Icahn Enterprises Holdings, Icahn Enterprises GP, Beckton and Mr. Icahn disclaims beneficial ownership of such Shares for all other purposes.”

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Transferee intends to submit an amended version of this Exhibit 16 during the pendency of this application. See Exhibit 20.