

ASSIGNEE'S EXHIBIT 13

**DESCRIPTION OF TRANSACTION AND IMPORTANT PUBLIC INTEREST
BENEFITS TO BE PROVIDED**

The instant application is one of three applications (“Applications”) being filed contemporaneously herewith seeking Commission consent to assign the stations listed below from subsidiaries of Sinclair Broadcast Group, Inc. (“Sinclair”) (one of which is currently a subsidiary of Tribune Media Company (“Tribune”)) to subsidiaries of Howard Stirk Holdings, LLC (“HSH”) immediately following consummation of the pending merger (the “Merger Transaction”) of Sinclair and Tribune.¹ Applications with respect to the Merger Transaction were filed on June 26, 2017.²

As these transactions are contingent upon consummation of the Merger Transaction, the applicants request the Commission process these Applications concurrently with the applications for the Merger Transaction.

Call Sign	Facility ID	Community of License	Licensee/Assignor
KAUT-TV	50182	Oklahoma City, OK	Tribune Broadcasting Oklahoma City License, LLC ³
KUNS-TV	4624	Bellevue, WA	Sinclair Seattle Licensee, LLC
KMYU(TV)	35822	St. George, UT	KUTV Licensee, LLC

The Merger Transaction has created an opportunity for HSH, a 100% minority owned and operated company, to acquire additional stations. HSH is owned by Mr. Armstrong Williams, one of the few African American television broadcast owners today. Mr. Williams’s ownership of television stations manifestly furthers competition, diversity, localism and the public interest. HSH and Mr. Williams have been able to provide a new and diverse voice in the

¹ See *John H. Phipps, Inc.*, 11 FCC Rcd 13053, 13056 (1996).

² See *Media Bureau Establishes Pleading Cycle for Applications to Transfer Control of Tribune Media Company to Sinclair Broadcast Group, Inc. and Permit-but-Disclose Ex Parte Status for the Proceeding*, Public Notice, DA 17-647, MB Docket No. 17-179 (Rel. July 6, 2017).

³ In connection with the Merger Transaction, an application was filed for consent to transfer control of Tribune Broadcasting Oklahoma City License, LLC from Tribune to Sinclair. See FCC File No. BTCCDT-20170626AEL. Upon consummation of the Merger Transaction, control of Tribune Broadcasting Oklahoma City License, LLC will transfer to Sinclair, and Sinclair will immediately thereafter consummate the assignment of KAUT-TV to a subsidiary of HSH.

marketplace and the communities where it operates stations,⁴ create new programming, and engage the local community in ways that did not exist before the stations were purchased. HSH proposes to do the same with the Station.

HSH's acquisition will also afford opportunity to expand employment of a diverse and multiracial workforce. Over half of the employees of Mr. Williams's companies holding television licenses are minorities, from entry-level positions to upper-level management positions. Minorities are employed as station general managers, directors of operations and creative directors.

The Commission has acknowledged the need to enhance minority ownership for forty years. *See e.g., Statement of Policy on Minority Ownership of Broadcast Facilities, Public Notice*, 68 FCC 2d 979 (1978). Congress also has recognized the poor state of minority ownership. The Telecommunications Act of 1996 contains language aimed at increasing female and minority ownership of broadcast licenses and other important communications mediums. 47 U.S.C. § 257, § 309(j). The Act requires the Commission to limit and remove "market entry barriers for entrepreneurs and other small businesses" and to do so by "favoring diversity of media voices."⁵ This assignment presents the opportunity for further genuine progress in advancing minority ownership.

At Closing HSH will enter into a Joint Sales Agreement ("JSA"), Shared Services Agreement ("SSA") and Option with Sinclair, copies of which are included with this Application. This is an enormous benefit and provides an appropriate way to increase the operational success of the Station, making real the advancement of minority ownership. Mr. Williams's believes JSAs and SSAs uniquely help minority owners. For example, in 2013, Mr. Williams's Saginaw (Flint) and Florence (Myrtle Beach) stations, which at the time represented two of only three television stations licensed to African American owned companies in the United States, used JSAs and SSAs. If Mr. Williams had not had the opportunity to enter into JSAs and SSAs, Mr. Williams would not have been able to fulfill his lifelong dream of being a TV station owner. These shared service agreements allowed Mr. Williams to obtain access to capital that would have otherwise been unavailable to him, and that access to capital and financing are the single biggest obstacles to new entrant and minority ownership. In Mr.

⁴ Mr. Williams's sole member companies hold the following licenses: WEYI-TV, Saginaw, MI; WWMB(TV), Florence, SC; WXBW(TV), Lancaster, PA; WSES(TV), Tuscaloosa, AL; WGWW(TV), Anniston, AL; KHSV(TV), Las Vegas, NV; and WGWG(TV), Charleston, SC.

⁵ While Section 257 is contained within Title II of the Communications Act and thus does not directly encompass broadcast services, the Commission has interpreted some aspects of the language of §257 to apply to broadcast licensing. In 1998, the Commission stated: "While telecommunications and information services are not defined by the 1996 Act to encompass broadcasting, Section 257(b) directs the Commission to 'promote the policies and purposes of this Act favoring diversity of media voices' in carrying out its responsibilities under Section 257 and, in its Policy Statement implementing Section 257, the Commission discussed market entry barriers in the mass media services." *See* FCC 98-281, *Report and Order: In the Matter of 1998 Biennial Regulatory Review -- Streamlining of Mass Media Applications Rules, and Processes -- Policies and Rules Regarding Minority and Female Ownership of Mass Media Facilities*, MM Docket No. 98-43, November 25, 1998.

Williams's experience, shared service arrangements provided the means over that obstacle, and accordingly advance diversity, open opportunity, and generally serve the larger public interest.

In its *Rules and Policies Concerning Attribution of Joint Sales Agreements in Local Television Markets (Reconsideration)*, FCC 17-156 (at ¶101), released November 20, 2017, the Commission noted, for example, that television JSAs contained ample evidence of the public interest benefits they provide. Specifically, while the Commission had made JSAs involving more than 15 percent of the brokered station's weekly advertising time attributable for ownership purposes in 2014, upon reconsideration it concluded that the potential benefits of television JSAs outweighed the public interest in attributing such JSAs (*supra*).

Based on Mr. Williams's experience with his stations in Saginaw (Flint) and Florence (Myrtle Beach), below is a list of a few examples of the types of public interest actions and service that he advanced there and plans to undertake here as well:

1. increase the public affairs and local programming on the Station.
2. increase the coverage of local events, people and leaders through guests on local public affairs programs.
3. produce and air public affairs shows hosted by Mr. Williams and covering current issues such as: Black Lives Matter, Right to Work, Small Business & Economic Development, Reducing Crime, etc.
4. hold and host town hall meetings that will be televised in prime time, to be hosted by Mr. Williams. These town halls will cover topics of local interest (previous town hall meetings Mr. Williams has hosted include: health care, domestic violence, and gun violence).
5. seek to obtain programs of particular interest and enjoyment to minority communities, such as *The Steve Harvey Show* and *Queen Latifah*.
6. advance minority employment and provide an internship program specifically targeted at minority students interested in the technical side of the television business.

HSH believes its proposed acquisition of the Station promotes the public interest, advance the Commission's interest of diversifying the voices provided by over-the-air-free-to-the-home broadcasting, and advances minority ownership.