

Exhibit 10
FCC Form 316
Section III, Paragraph 5

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 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 low power television station WSTQ-LP, Syracuse, New York (“Station”), 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 Station is currently licensed to Federal Broadcasting Company. Federal Broadcasting Company is wholly owned by Raycom-Fed, Inc., which entity is wholly owned by Raycom TV Broadcasting, Inc., a first tier subsidiary of Raycom.

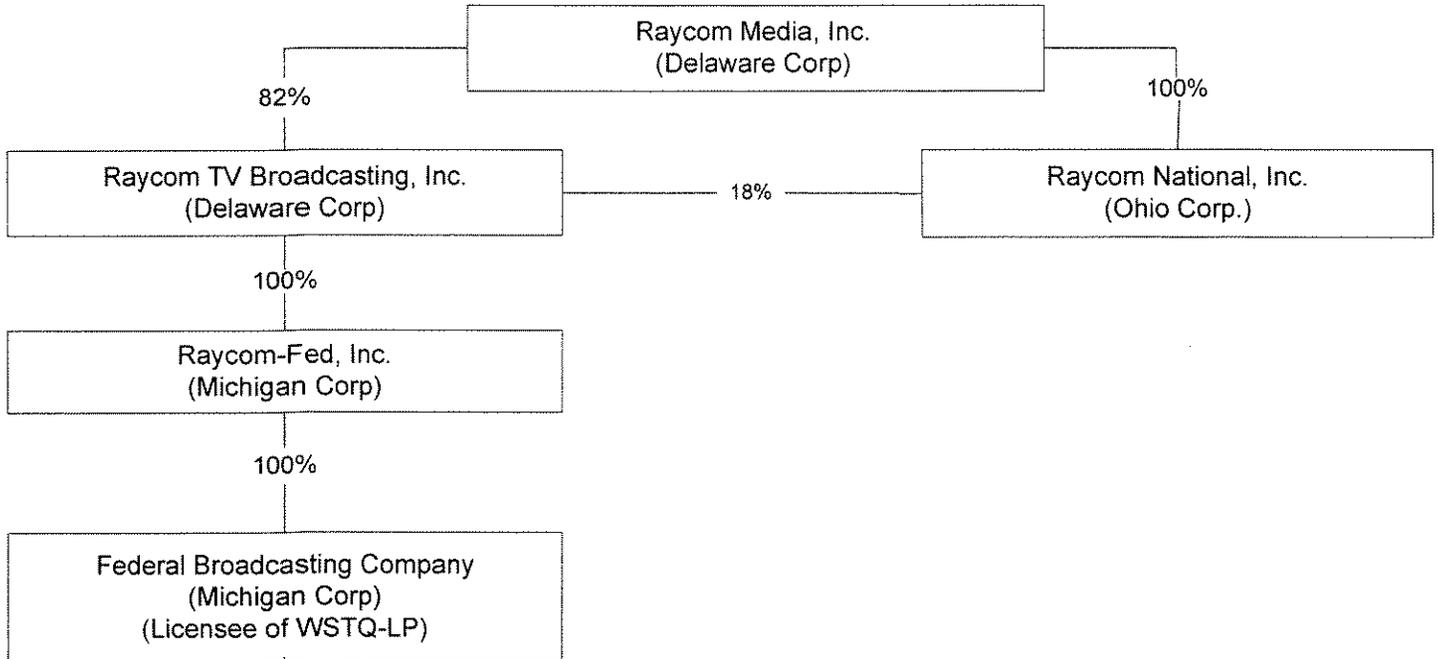
As reflected in the Annex B “After” diagram, following the corporate reorganization, the Station will be licensed to WSTM License Subsidiary, LLC, a newly-created Delaware LLC whose sole member will be WSTM, LLC, a newly-created Delaware LLC. Its sole member will be Raycom Holdings, LLC, a newly-created Delaware LLC. The sole member of Raycom TV Holdings, LLC will be Raycom TV Broadcasting, Inc., an 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 subsidiary Federal Broadcasting Company to Raycom's newly-formed, indirectly-owned subsidiary WSTM 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"

