

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 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* transfer of control of television station WTVR-TV, Richmond, Virginia (“Station”), from indirectly-owned subsidiaries of Raycom to new-formed, indirectly-owned subsidiaries of Raycom.

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

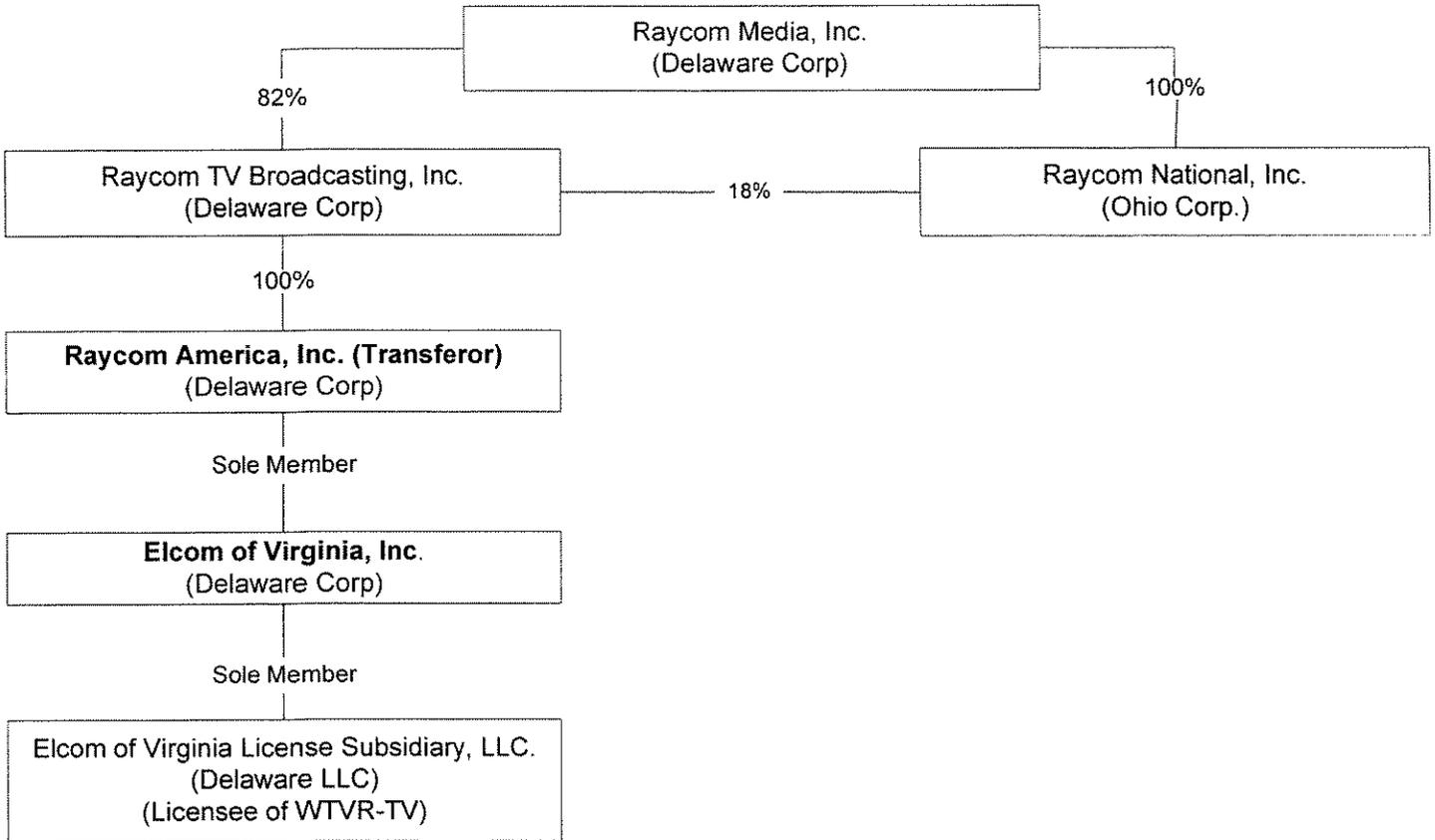
As reflected in the Annex B “After” diagram, following the corporate reorganization, the Station will continue to be licensed to Elcom of Virginia License Subsidiary, LLC. Pursuant to the reorganization, its immediate parent will become a Elcom of Virginia, LLC (having converted from a Delaware corporation to a Delaware LLC), and its parent will become Transferee Raycom TV Broadcasting, LLC, a newly-formed Delaware LLC (replacing Raycom America, Inc. in the corporate structure). The sole member of

Transferee Raycom TV Broadcasting, LLC will be Raycom TV Broadcasting, Inc., the existing first tier subsidiary of Raycom.

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"

