

Appendix D

Statement of Brian E. Cobb, President, CobbCorp, LLC

July 17, 2006

Donna C. Gregg, Chief
Media Bureau
Federal Communications Commission
445 12th Street, SW
Room 3-C740
Washington, DC 20554

Re: Application for Transfer of Control of:

WFUT-TV, Newark, New Jersey
WFTY-TV, Smithtown, New York

Dear Ms. Gregg:

In connection with the above referenced application, I have been requested by the purchaser thereto to opine on the continued operation of WFTY-TV as a satellite of WFUT-TV. This letter addresses the feasibility of operating and marketing WFTY-TV as a stand-alone operation rather than as a satellite.

By way of background, I have more than thirty-five years of experience in the broadcast industry as an owner, manager and broker of broadcast properties. I am President of CobbCorp, a media brokerage and merchant banking firm specializing in television station transactions. I was a founding member of Media Venture Partners, a nationally recognized media brokerage and appraisal firm, and I was responsible for the brokerage and appraisal of television stations for Media Venture Partners. Over the past eighteen years, I have been involved in the brokerage of more television stations than any other broker. I am a past President of the National Association of Media Brokers and am a member of the National Association of Program Television Executives.

I am familiar with the New York market and its surrounding television markets. I have visited the market several times and am knowledgeable of the signals of the television stations available in the market, the level of competition among them and other relevant market data. I have previously rendered opinions to the FCC regarding these particular stations in connection with prior transfers in 1996 and 2001. As a result, I have enough knowledge to reach certain conclusions concerning the WFUT-TV and WFTY-TV positions in the market and whether WFTY-TV would be viable as a stand-alone operation.

There are 16 operating commercial television stations assigned to the New York DMA as defined by Nielsen. New York is not only the largest television market in the country, but is one of the most competitive. To compete in a market of this magnitude, a station owner must have strong financial credentials to survive. Additionally, for a station to be viable, it needs to provide an adequate signal over New York City and most of the DMA. WFTY-TV as a stand alone facility is unable to do either. As a result, in my opinion, WFTY-TV would be unable to be economically viable as a stand-alone property.

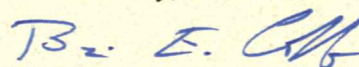
WFTY-TV has operated as a satellite station since 1980, and the Commission has approved that operation four times. If it were converted to a full service station, it is highly probable that it would be financially unsuccessful and clearly at a major competitive disadvantage. A coverage map of WFTY-TV shows that the station is unable to adequately cover the DMA and its Grade B signal barely reaches the outskirts of New York City, while complete coverage of New York City is a necessity, in my opinion, for viability.

Even if it were possible for WFTY-TV to serve a greater portion of the market, it would have no prospect of garnering affiliation agreements with any of the existing networks. If WFTY-TV were forced to broadcast as an independent, competing against the high number of other independent stations that currently serve the market would make its prospects of survival slim, particularly because WFTY-TV would have to invest in high-quality programming in order to compete with the quality programming of those other stations.

As a result of an insufficient signal covering either New York City or the entire DMA, and the lack of any prospects of any meaningful network affiliation, it is my opinion that WFTY-TV could not operate successfully as a stand-alone station. For the station to survive and provide service to the community, it needs to continue to operate as a satellite of a larger and more viable facility.

According to Univision senior management, during its term of ownership, Univision has never received an offer for the purchase of the station. If my firm was requested to broker the sale of WFTY-TV, I would be highly reluctant to accept the assignment due to the lack of creditable buyers available for this kind of property. In my opinion, the community is better served by the satellite arrangement WFTY-TV now has in the market.

Sincerely,



Brian E. Cobb
President