Response



# (REFERENCE COPY - Not for submission)

# Transfers

Lead File Number: BTCCT-20080909ACZ		Submit Date: 09/09	2008 Lead Call	Lead Call Sign: KREN-TV		001529627
Service: Analog TV legacy	Purpose: Tra	ansfer of Control	Status: Granted	Status Date: 09/1	7/2008	Filing Status:
Active						

General	Section	Question	Response
Information	Attachments	Are attachments (other than associated schedules) being filed with this application?	

# Fees, Waivers, and Exemptions

Section	Question	Response
Fees	Is the applicant exempt from FCC application Fees?	No
	Indicate reason for fee exemption:	
Waivers	Does this filing request a waiver of the Commission's rule(s)?	
	Total number of rule sections involved in this waiver request:	

## Transfer Type

Question	Response
Is this application a pro forma Transfer of Control?	Yes
By answering "Yes" the Applicant certifies that the use of short form pro forma application is appropriate for this transaction?	Yes
Is the Transfer Voluntary or Involuntary:	Involuntary

# Authorizations to be Transferred

#### Selected Call Signs

Call Sign	Facility ID	File Number	Service	City, State
KREN-TV	51493	BTCCT-20080909ACZ	TV	RENO, NV
KAZR-CA	34577	BTCTTA-20080909ADA	ACA	RENO, NV
KREN-LP	130444	BTCTTL-20080909ADD	LPA	SUSANVILLE, CA
KBVG-LP	129154	BTCTTL-20080909ADE	LPA	ELKO, NV
KNNC-LP	130281	BTCTVL-20080909ADB	LPA	BATTLE MOUNTAIN, NV
KPMP-LP	129333	BTCTVL-20080909ADC	LPA	WINNEMUCCA, NV

#### Transfer Questions

#### Question

Were any of the authorizations that are the subject of this application obtained through the Commission's competitive bidding procedures (see 47 C.F.R. Sections 1.2111(a) and 73.5000)?

Were any of the authorizations that are the subject of this application obtained through the Commission's point system for reserved channel noncommercial educational stations (see 47 C.F.R. Sections 73.7001 and 73.7003)?

Were any of the authorization	ns that are the subject of this application obtained after award of a dispositive
•	sing the Tribal Priority, through Threshold Qualifications procedures, or through the
Tribal Priority as applied befo	pre the NCE fair distribution analysis set forth in 47 C.F.R. § 73.7002(b)?
Have all such stations operate	ted for at least 4 years with a minimum operating schedule since grant?
Do both the transferor and tra	ansferee qualify for the Tribal Priority in all respects?
LPFM Licenses Only: Has it b was granted?	been at least 18 months since the initial construction permit for the LPFM station
LPFM Licenses Only: Does th CFR Section 73.865(a)(1)?	he assignment of the LPFM authorization satisfy the consideration restrictions of 47
-	any of the LPFM authorizations that are subject to this application obtained through em for low power FM stations (see 47 CFR Section 73.872)?
	re all such LPFM stations operated for at least four years since grant pursuant to the N. If Yes, nothing further required. No requires attachment as follows)"If no to new

## Licensee/Permittee Name, Type, and Contact Information

Licensee /Permittee Information

Licensee

/Permittee Legal Certifications

Licensee/Permittee	Address	Phone	Email	FRN
RENO LICENSE, LLC -DEBTOR-IN- POSSESSION Applicant Doing Business As: RENO LICENSE, LLC - DEBTOR-IN-POSSESSION	500 S. CHINOWTH ROAD VISALIA, CA 93277 United States	+1 (559) 733-7800	FCCMAIL@PAPPASTV. COM	0009421322

Licensee /Permittee	Contact Name	Address	Phone	Email	Contact Type
Contact Representatives (1)	<b>BRENDAN HOLLAND</b> DAVIS WRIGHT TREMAINE LLP	1919 PENNSYLVANIA AVE., NW SUITE 200 WASHINGTON, DC 20006	+1 (202) 973- 4200	BRENDANHOLLAND@DWT. COM	

Section	Question	Response
Agreements for Transfer Control of Station	Licensee/Permittee certifies that: (i) it has placed its public inspection file(s) and submitted to the Commission as an Exhibit to this application copies of all agreements for the transfer of the station(s); (ii) these documents embody the complete and final understanding between Transferor and Transferee; and (iii) these agreements comply fully with the Commission's rules and policies	
Other Authorizations	Please upload an attachment detailing the call signs, locations, and facility identifiers of all other broadcast stations in which Licensee/Permittee or any party to the application has an attributable interest.	

Character Issues	Licensee/Permittee certifies that neither licensee/permittee nor any party to the application has or has had any interest in, or connection with: (a) any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or any party to the application or (b) any pending broadcast application in which character issues have been raised	
Adverse Findings	Licensee/Permittee certifies that, with respect to the Licensee/Permittee and each party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	
Local Public Notice	Licensee/Permittee certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.	
Auction Authorization	Licensee/Permittee certifies that more than five years have passed since the issuance of the construction permit for the station being assigned, where that permit was acquired in an auction through the use of a bidding credit or other special measure.	
Anti-Discrimination Certification	Licensee/Permittee certifies that neither licensee/permittee nor any party to the application have violated the Commission's prohibition against discrimination on the basis of race, color, religion, national origin or sex in the sale of commercially operated AM, FM, TV, Class A TV or international broadcast stations.	

### Transferor Information

## Transferor Name, Type, and Contact Information

Transferor	Туре	Address	Phone	Email	FRN
HARRY J. PAPPAS, DEBTOR-IN- POSSESSION, ET. AL. Assignor Doing Business As: HARRY J. PAPPAS, DEBTOR-IN-POSSESSION, ET. AL.	Other	500 S. CHINOWTH ROAD VISALIA, CA 93277	+1 (559) 733-7800	FCCMAIL@PAPPASTV. COM	0009421322

Transferor Contact	Contact Name	Address	Phone	Email	Contact Type
Representatives (1)	<b>KATHLEEN VICTORY</b> FLETCHER HEALD & HILDRETH, PLC	1300 N. 17TH STREET SUITE 1100 ARLINGTON, VA 22209	+1 (703) 812- 0400	VICTORY@FHHLAW. COM	
Transferor Legal	Section Ques	stion		Response	

Certifications

Agreements for Transfer	Transferor certifies that:	N/A
Control of Station	<ul><li>(i) it has placed in Transferor's public inspection file(s) and submitted to the Commission as an Exhibit to this</li></ul>	
	application copies of all agreements for the assignment	
	<ul><li>/transfer of the station(s);</li><li>(ii) these documents embody the complete and final</li></ul>	
	understanding between Transferor and Transferee; and	
	(iii) these agreements comply fully with the Commission's	
	rules and policies	
	If the transaction is involuntary, the Transferor certifies that	Yes
	court orders or other authorizing documents have been issued and that it has placed in the licensee's/permittee's	
	public inspection file(s) and submitted to the Commission	
	copies of such court orders or other authorizing documents.	
Character Issues	Transferor certifies that neither transferor nor any party to	Yes
	the application has or has had any interest in, or connection with:	
	(a) any broadcast application in any proceeding where	
	character issues were left unresolved or were resolved	
	adversely against the applicant or any party to the	
	application or	
	(b) any pending broadcast application in which character issues have been raised	
Adverse Findings	Transferor certifies that, with respect to the Transferor and	Yes
	each party to the application, no adverse finding has been	
	made, nor has an adverse final action been taken by any	
	court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the	
	following: any felony; mass media-related antitrust or unfair	
	competition; fraudulent statements to another governmental	
	unit; or discrimination.	
Local Public Notice	Transferor certifies that it has or will comply with the public	
	notice requirements of 47 C.F.R. Section 73.3580.	
Auction Authorization	Transferor certifies that more than five years have passed	
	since the issuance of the construction permit for the station	
	being assigned, where that permit was acquired in an auction through the use of a bidding credit or other special	
	measure.	
Anti-Discrimination	Transferor certifies that neither licensee/permittee nor any	
Certification	party to the application have violated the Commission's	
	prohibition against discrimination on the basis of race, color,	
	religion, national origin or sex in the sale of commercially	
	operated AM, FM, TV, Class A TV or international broadcast stations.	

### Transferee Information

Transferee Contact

Representatives

## Transferee Name, Type, and Contact Information

Transferee	Тур	be	Address	Phone	Email	FRM
<b>E. ROGER WILLIAMS, TR Assignee</b> Doing Business As: E. ROO WILLIAMS, TRUSTEE		her	114 FERRIS HILL ROAD NEW CANAAN, CT 06840	+1 (203) 972-6447	PAPPASTRUSTEE@GMAIL COM	
Contact Name	Address		Phone	Email	Con Typ	

(1)	<b>BRENDAN HOLLAND</b> DAVIS WRIGHT TREMAINE LLP	1919 PENNSYLVANIA AVE., NW SUITE 200 WASHINGTON, DC 20006	+1 (202) 973- BRE 4200 COM	NDANHOLLAND@DWT. 1
Changes in Interest (0)	Party Name Citizenshi		il Interest Before Tran	sfer Interest After Transfer
Changes in Interest Certification	<b>Question</b> Applicant certifies that equi	ty and financial interests not set fo	orth by the transferee are r	nonattributable.
Parties to the Application (0)	Party Name Citi	zenship Address	Phone Email	Positional Interest
Application Certification Transferee Legal Certifications	Applicant certifies that equi Section Agreements for Sale	ty and financial interests not set for Question Transferee certifies that: (a) the written agreements in		nonattributable.       Response       No
Parties to the Application Certification	Question Applicant certifies that equi	ty and financial interests not set fo	orth by the transferee are r	Response
		<ul> <li>inspection file and submitted</li> <li>complete and final agreement</li> <li>station(s); and</li> <li>(b) these agreements comply</li> <li>rules and policies.</li> </ul>	to the Commission embo at for the sale or transfer o	f the
	Other Authorizations	Please upload an attachmen locations, and facility identifie stations in which Transferee has an attributable interest.	ation	
	Multiple Ownership	Is the Transferee or any part an attributable radio joint sale radio or television time broke (s) subject to this application same market as the station(s	es agreement or an attribu rage agreement with the or with any other station i	utable station in the
		Transferee certifies that the p with the Commission's multip		nplies
		Transferee certifies that the p (1) does not present an issue policies relating to media inter- members; (2) complies with the Commi ownership interests; and (3) complies with the Commi the insulation and nonparticip and creditors.	e under the Commission's erests of immediate family ssion's policies relating to ssion's restrictions relating	future g to

	<ul> <li>Does the Transferee claim status as an "eligible entity," that is, an entity that qualifies as a small business under the Small Business Administration's size standards for its industry grouping (as set forth in 13 C.F.R. § 121-201), and holds</li> <li>(1) 30 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet; or</li> <li>(2) 15 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet, provided that no other person or entity owns or controls more than 25 percent of the outstanding stock or partnership interests; or</li> <li>(3) More than 50 percent of the voting power of the corporation that will own the media outlet (if such corporation is a publicly traded company)?</li> </ul>	
	<ul> <li>Does this transfer include a grandfathered cluster of stations?</li> <li>Applicant certifies that it will come in compliance by divesting the necessary station(s) within 12 months of the consummation of this transaction to:</li> <li>A) An Eligible Entity (as defined in Item 6d, above).</li> </ul>	
Acquisition of Control	<ul> <li>B) An Irrevocable Trust that will assign the station(s) to an Eligible Entity.</li> <li>Please upload an attachment listing the file number and date of grant of FCC Form 301, 314, or 315 application by which the Commission approved the qualifications of the individual or entity with a pre-existing interest in the licensee/permittee that is now acquiring control of the licensee/permittee as a result of the grant of this application.</li> </ul>	N/A
Character Issues	Transferee certifies that neither transferee nor any party to the application has or has had any interest in, or connection with: (a) any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or any party to the application; or (b) any pending broadcast application in which character issues have been raised.	Yes
Adverse Findings	Transferee certifies that, with respect to the transferee and each party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	Yes
Financial Qualifications	Transferee certifies that sufficient net liquid assets are on hand or are available from committed sources to consummate the transaction and operate the station(s) for three months.	
Program Service Certification	Transferee certifies that it is cognizant of and will comply with its obligations as a Commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.	

Auction Authorization	Transferee certifies that where less than five years have passed since the issuance of the construction permit and the permit had been acquired in an auction through the use of a bidding credit or other special measure, it would qualify for such credit or other special measure.	
Equal Employment Opportunity (EEO)	If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.	

Response

## Tranferee Alien Ownership

Question

1) Is the applicant a foreign government or the representative of any foreign government as specified in Section 310(a) of the Communications Act?2) Is the applicant an alien or the representative of an alien? (Section 310(b)(1))3) Is the applicant a corporation, or non-corporate entity, that is organized under the laws of any foreign government? (Section 310(b)(2))4) Is the applicant an entity of which more than one-fifth of the capital stock, or other equity or voting interest, is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any entity organized under the laws of a foreign country? (Section 310(b)(3))5) Is the applicant directly or indirectly controlled by any other entity of which more than one-fourth of the capital stock, or other equity or voting interest, is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any entity organized under the laws of a foreign country? (Section 310(b)(4))6) Has the applicant received a declaratory ruling(s) under Section 310(b)(4) of the Communications Act?6a) Enter the citation of the applicable declaratory ruling by DA/FCC number, FCC Record citation, release date, or any other identifying information.7) Has there been any change in the applicant's foreign ownership since issuance of the declaratory ruling(s) cited in response to Question 6?8) Does the applicant certify that it is in compliance with the terms and conditions of the foreign ownership declaratory ruling(s) cited in response to Question 6?		
<ul> <li>3) Is the applicant a corporation, or non-corporate entity, that is organized under the laws of any foreign government? (Section 310(b)(2))</li> <li>4) Is the applicant an entity of which more than one-fifth of the capital stock, or other equity or voting interest, is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any entity organized under the laws of a foreign country? (Section 310(b)(3))</li> <li>5) Is the applicant directly or indirectly controlled by any other entity of which more than one-fourth of the capital stock, or other equity or voting interest, is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any entity organized under the laws of a foreign country? (Section 310(b)(3))</li> <li>5) Is the applicant directly or voting interest, is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any entity organized under the laws of a foreign country? (Section 310(b)(4))</li> <li>6) Has the applicant received a declaratory ruling(s) under Section 310(b)(4) of the Communications Act?</li> <li>6a) Enter the citation of the applicable declaratory ruling by DA/FCC number, FCC Record citation, release date, or any other identifying information.</li> <li>7) Has there been any change in the applicant's foreign ownership since issuance of the declaratory ruling(s) cited in response to Question 6?</li> <li>8) Does the applicant certify that it is in compliance with the terms and conditions of the foreign ownership declaratory ruling(s) cited in response to Question 6?</li> </ul>		
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<ul> <li>cited in response to Question 6?</li> <li>8) Does the applicant certify that it is in compliance with the terms and conditions of the foreign ownership declaratory ruling(s) cited in response to Question 6?</li> </ul>		
declaratory ruling(s) cited in response to Question 6?		
• In some sting with this and insting is the soulisest filling a family support in Datities for Datherstony Dation		
9) In connection with this application, is the applicant filing a foreign ownership Petition for Declaratory Ruling pursuant to Section 310(b)(4) of the Communications Act?	onnection with this application, is the applicant filing a foreign ownership Petition for Declaratory Ruling suant to Section 310(b)(4) of the Communications Act?	

Licensee	ction	Question	Response
/Permittee Certification	eneral Certification atements	Licensee/Permittee certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Licensee/Permittee further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.	

	The Licensee/Permittee certifies that neither the Licensee /Permittee nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti- Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1.2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification § 1.2002(c). The Licensee/Permittee certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.	
Authorized Party to Sign	<ul> <li>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</li> <li>Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements.</li> <li>Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization.</li> <li>Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application.</li> <li>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND /OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).</li> </ul>	
	I certify that this application includes all required and relevant attachments.	
	I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.	

Transferee	Section	Question	Response
Certification	General Certification Statements	The Transferee certifies that neither the Transferee nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1. 2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification § 1.2002 (c). The Transferee certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.	

Authorized Party to Sign	FAILURE TO SIGN THIS APPLICATION MAY RESULT IN	
	DISMISSAL OF THE APPLICATION AND FORFEITURE	
	OF ANY FEES PAID	
	Upon grant of this application, the Authorization Holder may	
	be subject to certain construction or coverage requirements.	
	Failure to meet the construction or coverage requirements	
	will result in automatic cancellation of the Authorization.	
	Consult appropriate FCC regulations to determine the	
	construction or coverage requirements that apply to the type	
	of Authorization requested in this application.	
	WILLFUL FALSE STATEMENTS MADE ON THIS FORM	
	OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND	
	/OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR	
	<b>REVOCATION OF ANY STATION AUTHORIZATION (U.S.</b>	
	Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S.	
	Code, Title 47, §503).	
	I certify that this application includes all required and	
	relevant attachments.	
	I declare, under penalty of perjury, that I am an authorized	E. ROGER WILLIAMS
	representative of the above-named applicant for the	TRUSTEE
	Authorization(s) specified above.	
		09/09/2008

	Section	Question	Response
	General Certification Statements	The Transferor certifies that neither the Transferor nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1. 2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification § 1.2002 (c). The Transferor certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.	
	Authorized Party to Sign	<ul> <li>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</li> <li>Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements.</li> <li>Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization.</li> <li>Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application.</li> <li>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND /OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).</li> <li>I certify that this application includes all required and relevant attachments.</li> </ul>	

I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.

#### HARRY J. PAPPAS, DEBTOR-IN-POSSESSION GENERAL PARTNER OF SOLE MEMBER

09/04/2008

#### Attachments

File Name	Uploaded By	Attachment Type	Description	Upload Status
<u>1263530_4789668.</u> pdf	Applicant	All Purpose	Bankruptcy documents	Done with Virus Scan and/or Conversion
<u>1263530_4810331.</u> pdf	Applicant	All Purpose	Description of Transaction	Done with Virus Scan and/or Conversion
<u>1263530_675854.txt</u>	Applicant	All Purpose	EXHIBIT 2	Done with Virus Scan and/or Conversion
<u>1263530_675855.txt</u>	Applicant	All Purpose	EXHIBIT 5	Done with Virus Scan and/or Conversion
<u>1263530 675856.txt</u>	Applicant	All Purpose	EXHIBIT 9	Done with Virus Scan and/or Conversion
<u>1263530 675857.txt</u>	Applicant	All Purpose	EXHIBIT 10	Done with Virus Scan and/or Conversion
<u>1263530_675858.txt</u>	Applicant	All Purpose	EXHIBIT 12	Done with Virus Scan and/or Conversion