

DESCRIPTION AND CHANGE IN INTEREST AS A RESULT OF THE TRANSACTION AND PUBLIC INTEREST BENEFITS

By this application, Channel 39, Inc., which is a wholly-owned subsidiary of Tribune Company ("Tribune"), hereby seeks authority to assign the license for E090016 ("SNG Facility") to WGN Continental Broadcasting Company, also a wholly owned subsidiary of Tribune. The underlying purpose of this assignment involves a physical relocation of the SNG Facility from Miami to Chicago; however, all technical parameters set forth in the underlying authorization will remain the same.

Tribune and each of its subsidiaries have been operating as debtors-in-possession in the ordinary course under the bankruptcy Court's oversight, *see In re Tribune Company et al.*, Case No. 08-13141 (Chapter 11) (Bnkr. D. Del.) and it is anticipated that each will continue operation in the ordinary course throughout the Chapter 11 process. The Commission has already approved the *pro forma* assignment of the various authorizations from the various Tribune subsidiaries to the same Tribune subsidiaries operating as debtors-in-possession, including the SNG Facility, *see* SES-ASG-20090724-00915.

The instant *pro forma* assignment does not effect a substantial change in the control of the license, as the ownership structure, as well as a majority of the officers and directors of both Channel 39, Inc. and WGN Continental Broadcasting Company, have remain unchanged since filing of the bankruptcy petition. WGN Continental Broadcasting Company as the Assignee will continue to use SNG Facility in the same manner and for the same purpose as used by Channel 39, Inc. Accordingly, the contemplated assignment is *pro forma* in nature. See 47 C.F.R. 73.3541 (2008); 1998 Biennial Regulatory Review – Streamlining of Mass Media Applications, Rules and Processes, 13 FCC Rcd. 11349, procedures), citing O.D.T. International, 9 FCC Rcd. 2575 (1994).

This transaction will serve the public interest by allowing WGN Continental Broadcasting Company to continue using the SNG Facility to provide important communication services to the public.