

## **REQUEST FOR SPECIAL TEMPORARY AUTHORITY**

FCC File Nos.:

WJRT-TV: E040304: SES-T/C-20140723-00611; SES-ASG-20140903-00692  
E040379: SES-T/C-20140723-00609; SES-ASG-20140903-00690  
E970268: SES-T/C-20140723-00610; SES-ASG-20140903-00691

WTVG: E040306: SES-T/C-20140723-00613; SES-ASG-20140903-00687  
E070082: SES-T/C-20140723-00612; SES-ASG-20140903-00693

Gray Television Group, Inc. (“GTG”) and Gray Television Licensee, LLC (“Gray Licensee,” and together with GTG, “Gray”) hereby request special temporary authority for Gray to operate the above referenced earth stations (the “Earth Stations”) while the FCC continues to process the above-referenced transfer of control and *pro forma* assignment of license applications.

### **Background**

On July 23, 2014, Gray filed a series of applications with the Media, Wireless, and International Bureaus to transfer control of the FCC licenses used in connection with television stations WJRT-TV, Flint, Michigan, and WTVG, Toledo, Ohio.<sup>1</sup> The applications sought authority to transfer control of WJRT-TV and WTVG from SJL Holdings II, LLC to GTG. The Media Bureau and the Wireless Bureau each have granted their respective applications. The applications filed with the International Bureau, however, remain pending.

As part of its acquisition of television stations WJRT-TV and WTVG, Gray later filed several applications seeking consent to the *pro forma* assignment of the licenses from Flint License Subsidiary Corp. (WJRT-TV) and WTVG, Inc. (WTVG) to Gray Licensee.<sup>2</sup> The Media Bureau also has granted its respective *pro forma* applications. The *pro forma* applications filed with the International Bureau, however, remain pending. Gray anticipates that it will consummate the *pro forma* assignment of licenses one day after it consummates the transfer of control.

The chart attached as Exhibit B shows the ownership structure proposed once the parties consummate the transfer of control applications and the structure proposed once the parties consummate the *pro forma* assignment of license transaction.

### **Request for Special Temporary Authority**

Gray respectfully requests Special Temporary Authority to operate the Earth Stations as set forth in the above referenced transfer of control and *pro forma* assignment of license applications. Gray anticipates that it will consummate the transfer of control on September 15,

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<sup>1</sup> Exhibit A includes a list of each of the call signs and file numbers for all of the relevant applications.

<sup>2</sup> See Exhibit A.

2014, and it will consummate the *pro forma* assignment of licenses one day later on September 16, 2014.

Grant of this request for Special Temporary Authority is in the public interest. As an initial matter, both the Media and Wireless Bureaus have already made a finding that both the transfer of control and *pro forma* assignment of licenses serve the public interest. Grant of this request for Special Temporary Authority also will serve the public interest for the same reasons found by the other Bureaus. Moreover, grant of this request for Special Temporary Authority will allow Gray to continue to use the Earth Stations in connection with the operations for television stations WJRT-TV and WTVG. Specifically, the Earth Stations allow the television stations to receive quality programming and aid in the gathering and reporting of local news. Thus, Special Temporary Authority will ensure that local viewers will not suffer even though the applications for the Earth Stations remain pending.

The transfer of control and *pro forma* assignment of license applications remain pending due to circumstances beyond Gray's control. Gray timely filed each of the applications, and the Media Bureau and Wireless Bureau promptly put each application on Public Notice. The International Bureau, however, did not place its application for the transfer of control on Public Notice until August 27, 2014 – more than thirty days after Gray filed the applications. Thus, the International Bureau applications remain pending even though the applications filed with the other Bureaus have been granted.

Gray only seeks Special Temporary Authority to operate the Earth Stations in the manner proposed in each of the pending transfer of control and *pro forma* assignment of license applications until the International Bureau is able to complete its processing of the applications, and Gray requests Special Temporary Authority for a period of no more than thirty days. Gray recognizes that grant of this request for Special Temporary Authority will in no way prejudice any decision the International Bureau might make regarding the pending applications.

Gray respectfully requests expedited processing of this request. The parties have scheduled the closing of the transfer of control for **Monday, September 15, 2014**, and the *pro forma* assignment of licenses is scheduled to close one day later on Tuesday, September 16, 2014.

## EXHIBIT A

Gray filed the following applications with the FCC on July 23, 2014, for the transfer of control of the licenses used in connection with television station WJRT-TV:

Bureau	Call Sign	File No.	Date Granted
Media	WJRT-TV	BTCCDT-20140723AFI	9/5/2004
Wireless	KNAH775, WEG842, WEG843, WNLC477, WPNX785, WPXX893	0006384817	9/11/2014
International	E040304	SES-T/C-20140723-00611	Pending
International	E040379	SES-T/C-20140723-00609	Pending
International	E970268	SES-T/C-20140723-00610	Pending

Gray filed the following applications with the FCC for the *pro forma* assignment of licenses used in connection with television station WJRT-TV:

Bureau	Call Sign	File No.	Date Granted
Media	WJRT-TV	BALCDT-20140829ACG	9/11/2004
Wireless	KNAH775, WEG842, WEG843, WNLC477, WPNX785, WPXX893	0006446133	Pending
International	E040304	SES-ASG-20140903-00692	Pending
International	E040379	SES-ASG-20140903-00690	Pending
International	E970268	SES-ASG-20140903-00691	Pending

Gray filed the following applications with the FCC on July 23, 2014, for the transfer of control of the licenses used in connection with television station WTVG:

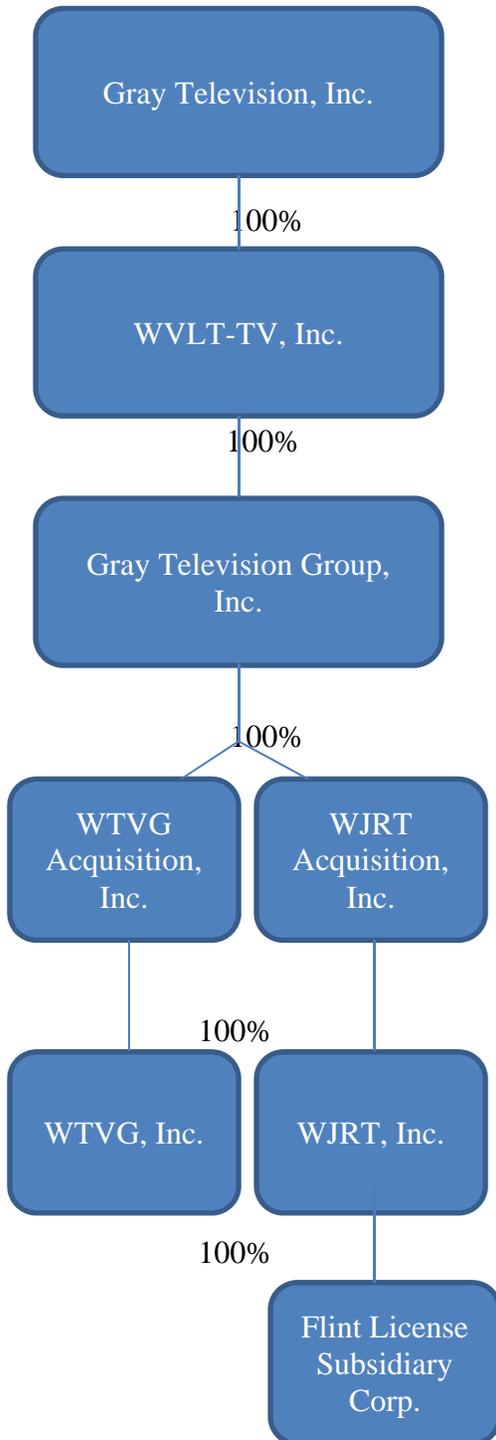
Bureau	Call Sign	File No.	Date Granted
Media	WTVG	BTCCDT-20140723AFJ	9/5/2004
Wireless	WQEW538, WQRF664, WQRF665, WQRF666, WQTQ262	000638829	9/11/2014
International	E040306	SES-T/C-20140723-00613	Pending
International	E070082	SES-T/C-20140723-00612	Pending

Gray filed the following applications with the FCC for the *pro forma* assignment of licenses used in connection with television station WTVG:

Bureau	Call Sign	File No.	Date Granted
Media	WTVG	BALCDT-20140829ACF	9/11/2004
Wireless	WQEW538, WQRF664, WQRF665, WQRF666, WQTQ262	0006446112	Pending
International	E040306	SES-ASG-20140903-00687	Pending
International	E070082	SES-ASG-20140903-00693	Pending

**EXHIBIT B**

**Ownership Structure Proposed in SJL  
Transaction Transfer of Control  
Applications**



**Ownership Structure Proposed in Pro  
Forma Assignment of License Applications**

