

Description of Transaction

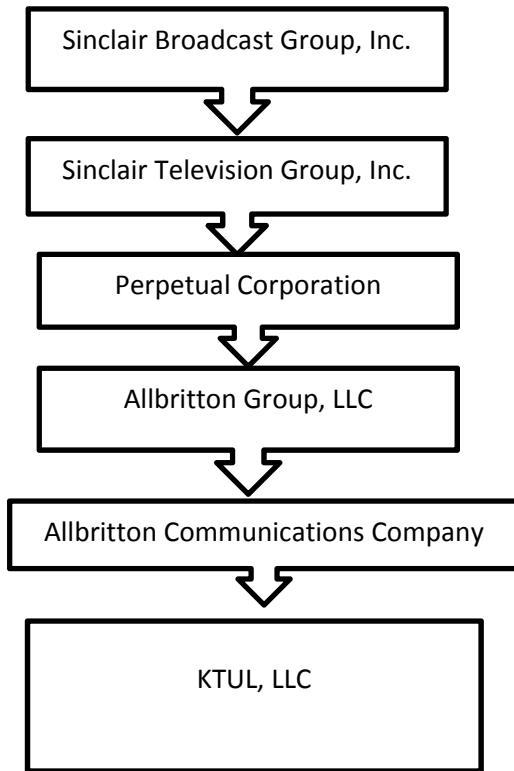
The proposed transaction is part of an internal reorganization.

In August 2014, the applicant proposed, and the FCC reviewed and consented to, a pro forma assignment application in which several earth station licenses, which are used in the operation of KTUL(TV), Tulsa, Oklahoma, would be assigned from KTUL, LLC into a direct, wholly-owned subsidiary, KTUL Licensee, LLC. See FCC File No. SES-ASG-20140829-00677 (the "August Assignment"). The August Assignment has not yet been consummated.

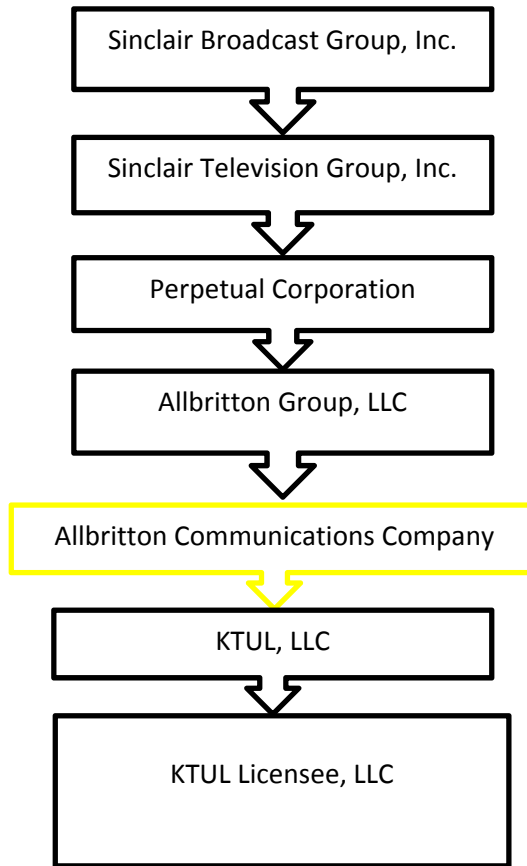
In the instant pro forma application, Allbritton Communications Company, KTUL, LLC's controlling member, will merge in, and contribute its interests in the licenses, to its immediate parent, Allbritton Group, LLC ("AGLLC"). Following Commission consent to the proposed transfer of control, the parties anticipate concurrently consummating this transaction and the August Assignment. As a result, the licensee will be a direct, wholly-owned subsidiary of AGLLC. See attached ownership chart.

CURRENT, INTERIM and FINAL OWNERSHIP STRUCTURE

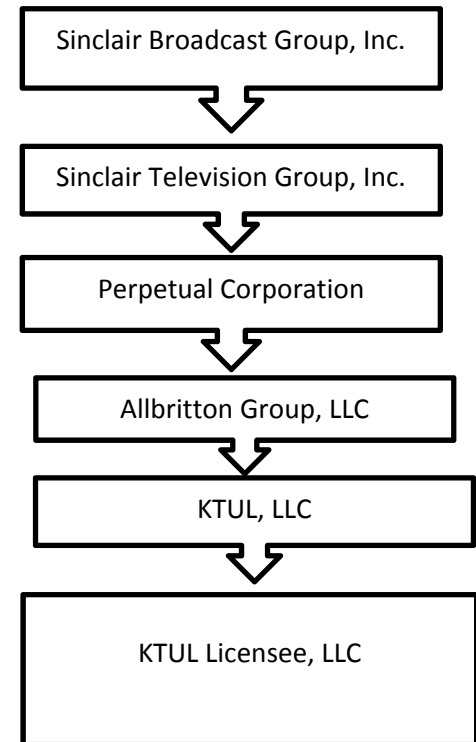
CURRENT OWNERSHIP STRUCTURE



INTERIM OWNERSHIP STRUCTURE¹



PROPOSED OWNERSHIP STRUCTURE



¹ The Interim Ownership structured, as filed in a FCC Form 312, was reviewed and approved by the Commission October 22, 2014. See FCC File No. SES-ASG-20140829-00677. This transaction has not been consummated, but will concurrently close with the Final Proposed Ownership Structure application, following Commission consent, before December 31, 2014.