

Federal Communications Commission Washington, D.C. 20554 OCT 2 3 2009

Raycom Media, Inc. c/o Jonathan D. Blake, Esq. Covington & Burling LLP 1201 Pennsylvania Avenue, N.W. Washington, DC 20004

HITV License Subsidiary, Inc. c/o John Griffith Johnson, Jr. Paul, Hastings, Janofsky & Walker LLP 875 15th Street, N.W. Washington, DC 20005

Re:

Complaint and Request for Emergency Relief Regarding Shared Services Agreement Between Raycom Media and MCG Capital

Dear Counsel:

This letter addresses the above-referenced Complaint and Request for Emergency Relief filed by Media Council Hawai'i ("Media Council") on October 7, 2009. In its complaint, Media Council argues, among other things, that a series of agreements between the licensees of station KHNL(TV) and KFVE(TV), Honolulu, Hawaii, wholly owned subsidiaries of Raycom Media, Inc. ("Raycom"), and HITV License Subsidiary, Inc. ("HITV"), licensee of station KGMB(TV), Honolulu, Hawaii, would result in an unauthorized transfer of control of station KGMB(TV) to Raycom, in violation of section 310(d) of the Communications Act of 1934 and section 73.3555(b) of the Commission's rules.

Pursuant to authority set forth in section 1.41 of the Commission's rules,² and to determine the appropriate procedural status of the transaction, we request that Raycom and HITV file executed versions of the Asset Exchange Agreement, Shared Services Agreement, Option Agreement, and the Lease Agreement, to the extent one exists, described in a September 16, 2009, communication to Commission staff.

¹ 47 U.S.C. § 310(d); 47 C.F.R. § 73.3555(b) (2002).

² 47 C.F.R. § 1.41.

We request that hard copies and pdf versions of the agreements be submitted to David J. Brown, Attorney-Advisor, Video Division, Media Bureau, at David.Brown@fcc.gov, and to Angela J. Campbell, Esq., counsel for complainant, Media Council, no later than five (5) calendar days of their execution.

Sincerely,

Barbara A. Kreisman Chief, Video Division

Media Bureau

cc: Angela J. Campbell, Esq.
Institute for Public Representation
Georgetown University Law Center
600 New Jersey Avenue, N.W.
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