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December 16, 2022

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

**Re: In re Applications to Transfer Control of TEGNA Inc. ("TEGNA") to
Standard General L.P., MB Docket No. 22-162**

Dear Ms. Dortch:

In connection with the applications filed in the above-referenced proceeding ("Applications"), this letter addresses the applicability of retransmission consent agreements (each, an "RCA") to the TEGNA stations that will be controlled by Standard General L.P. and SGCI Holdings III LLC (collectively, "Standard General") following the transactions contemplated by the Applications (the "Transactions").

As Standard General has previously stated, any impact of the Transactions on the retransmission consent fees payable by multichannel video programming distributors ("MVPDs") is not central to Standard General's thesis for the proposed Transactions. Accordingly, in light of the cost of continued delay to the closing of the Transactions (the "Closing"), consistent with the terms of the Agreement and Plan of Merger, dated February 22, 2022, Standard General hereby:

- (1) voluntarily and irrevocably waives enforcement or other application of any term or condition of an RCA that would, by reason of any of the Transactions, result in an RCA between Cox Media Group and any MVPD applying to any current TEGNA station that will be controlled by Standard General after the Closing (such stations, the "TEGNA Stations"); and
- (2) acknowledges and agrees that the intent and effect of such waiver is to permit any RCA with TEGNA in effect as of the time immediately prior to the Closing to continue to apply to the TEGNA Stations as of and following the Closing.

Please contact the undersigned if you have any questions with respect to the foregoing.

Very truly yours,

Soohyung Kim