

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL

ORIGINAL

In re Applications of

) MM Docket No. 91-10

WHITE BROADCASTING PARTNERSHIP
et al.

) File No. BPH-891214MM

For Construction Permit for a New FM Station
Station on Channel 289A in Baldwin, Florida

RECEIVED

To: Hon. Edward Luton, Administrative Law Judge

MAY 10 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PEACHES BROADCASTING, LTD.
FILE NO. BPH-811214MN

INTEGRATION AND DIVERSIFICATION STATEMENT

David Honig
1800 N.W. 187th Street
Miami, Florida 33056
(305) 628-3600

Counsel for Peaches
Broadcasting, Ltd.

May 10, 1991

PRINCIPALS OF THE APPLICANT

The owners of Peaches Broadcasting, Ltd. ("Peaches") are:

Peaches Productions Group, Inc. ("PPGI"), 9130 11th Avenue, Jacksonville, FL 32208. PPGI is the sole general partner of Peaches. It holds a 25% equity interest in the partnership. Frederick Matthews is the President and a Director of PPGI; he owns a 50% equity interest in PPGI. Anna Matthews is the Vice President, Secretary and a Director of PPGI; she owns a 50% equity interest in PPGI. The Matthews' are husband and wife. They reside at 9130 11th Avenue, Jacksonville, FL 32208.

United Communications, Inc. ("UCI"). UCI is the sole limited partner of Peaches, holding a 75% equity interest in the partnership. It is a District of Columbia corporation whose address of record is 1425 Fourth St. S.W. #A-105, Washington, D.C. 20024. UCI has one class of shares (common and voting) and 84 shares outstanding. All owners of UCI are U.S. citizens. The names, addresses and interests of its stockholders are as follows.

- a. Lawrence Doss
President, Treasurer, and Board Member
19.05% owner, holding 16 shares
19391 Suffolk Dr.
Detroit, Michigan 48203
- b. Glenn Haydel
Secretary and Board Member
11.90% owner, holding ten shares
4465 Bancroft Dr.
New Orleans, Louisiana 70122
- c. C.C. Haydel
7.14% owner, holding six shares (voted by proxy
by Glenn Haydel)
4465 Bancroft Dr.
New Orleans, Louisiana 70122
- d. Dr. Gilbert A. Maddox
Board Member
6.12% owner, holding 5.143 shares
1425 Fourth St. S.W. #A-105
Washington, D.C. 20024
- e. Gregory Syphax
2.47% owner, holding 2.075 shares (voted by
proxy by Dr. Gilbert A. Maddox)
1439 Locust Rd. N.W.
Washington, D.C. 20012

- f. Dr. Burke Syphax
5.69% owner, holding 4.782 shares (voted by
proxy by Gilbert A. Maddox)
1370 Hamilton St. N.W.
Washington, D.C. 20011
- g. Walter Douglas
Chairman of the Board and Board Member
3.57% owner, holding three shares
20035 Lichfield
Detroit, Michigan 48221
- h. Paul Hubbard
3.57% owner, holding three shares (voted by
proxy by Walter Douglas)
18995 Birchcrest
Detroit, Michigan 48221
- i. Howard Sims
3.57% owner, holding three shares (voted by
proxy by Walter Douglas)
1326 Nicolet Pl.
Detroit, Michigan 48207
- j. Samuel Thomas
3.57% owner, holding three shares (voted by
proxy by Walter Douglas)
19360 Burlington
Detroit, Michigan 48221
- k. Dr. James Freemont
Board Member
14.29% owner, holding 12 shares
3774 Highway 166 West
Douglasville, Georgia 30134
- l. Betty Hood
4.76% owner, holding four shares (voted by proxy
by Dr. James Freemont)
631 Flamingo Dr. S.W.
Atlanta, Georgia 30311
- m. Jacques Morial
Board Member
14.29% owner, holding 12 shares (held in trust
for the estate of his father, the late Ernest N.
Morial)
936 N. Rampart Street
New Orleans, Louisiana 70116.

PRINCIPALS TO BE INTEGRATED

Frederick Matthews will work at the station as General Manager on a full-time basis (at least 40 hours per week). In that position, Mr. Matthews will ultimately be responsible for all management, administrative, and budgetary decisions relating to the operation of the station (except those normally performed by a Program Director). He will share responsibility for hiring the staff with Mrs. Matthews.

Anna Matthews will work at the station as Program Director on a full-time basis (at least 40 hours per week). In that position, Mrs. Matthews will directly supervise and schedule all on-air employees, including announcers and the News and Public Affairs Director, and will ultimately be responsible for all programming decisions relating to the operation of the station. Mrs. Matthews will also implement the station's EEO Program. She will share responsibility for hiring the staff with Mr. Matthews.

If Peaches obtains the construction permit, the Matthews' will each resign all other employment in order to fulfill their integration commitments. They will also sell or close down the nonbroadcast operations of PPGI.

As noted below, the Matthews' are active in numerous civic activities. If Peaches is awarded the construction permit, the Matthews' will each reduce their time commitments to these activities (apart from activities in which they are involved as part of their routine professional responsibilities at the radio station) to no more than approximately 20 hours per week.

QUALITATIVE ENHANCEMENTS

A. Local Residence

The Matthews' have each been lifelong residents of Jacksonville (excepting Mr. Matthews' nine and one half year stint in the military, from 6/71-1/81). Throughout the time the Matthews' have resided in Jacksonville, they have lived within the 60 dbu contour of the proposed station. They do not plan to move to Baldwin, which is entirely surrounded by the City of Jacksonville.

B. Racial and Gender Enhancements

Mr. Matthews is a Black male. He will make use of his racial background to provide a program service which will be particularly responsive to the needs of minorities in the service area, including the need for better interracial communications.

Mrs. Matthews is a Black female. She will make use of her racial background and her gender to provide a program service which will be particularly responsive to the needs of minorities and women in the service area, including the need for better interracial and inter-gender communications.

C. Civic Involvement

Peaches will claim credit for the Matthews' extensive participation in civic organizations, the territorial jurisdiction of which includes Baldwin and/or other communities with the proposed station's service area.

The organizations in which Mr. Matthews has been involved include the following.

<u>Dates</u>	<u>Activities and Responsibilities</u>
1978 - Present	Jacksonville Branch of the NAACP. Member since 1978; President, 7/83 - 10/84. Board Member since 1/82. Fulltime volunteer from 9/83 - 10/84. Since October, 1984, Mr. Matthews has devoted approximately two hours weekly to NAACP activities.
6/82 - 5/90	Jacksonville Association of Black Communicators. Founding President, 6/82 - 6/83; Board Member from 6/82 - 6/84. Mr. Matthews devoted approximately three hours per week to the Association throughout most of the time he was on the Board.
7/83 - 10/84	IMPACT: Board Member. IMPACT is a local crime prevention organization. Mr. Matthews devoted approximately two hours per week to IMPACT.
9/87 - 9/88	Center of Excellence: Board Member. The Center was a support group for Black high school students, encouraging them to attend college. Mr. Matthews devoted approximately one hour per week to the Center.
8/88 - 6/89	Leadership Jacksonville, Class of 1988. This is a class designed to encourage and identify business, social and educational community leaders. Mr. Matthews devoted approximately eight hours per month to Leadership Jacksonville.
8/88 - 3/90	Ritz Theater Renovation District, Inc. Board Member since 9/89. Mr. Matthews devoted approximately two hours per week to renovating the Theater.
7/89 - 12/90	Superintendent's Vocational Advisory Committee: Member. Mr. Matthews devoted approximately one hour per week to the Advisory Committee.
8/89 - 9/89	United States Constitution Bicentennial Commission of Jacksonville: Member. Mr. Matthews devoted approximately two hours per month (for two months) to the Commission.

9/89 - 4/90

State Insurance Commissioner's Auto Insurance Task Force: Member. Mr. Matthews devoted approximately one hour per week to the Task Force.

12/89 - Present

Northwest Council of the Jacksonville Chamber of Commerce: Board Member (elected). Mr. Matthews expects to devote approximately two hours per week to the Northwest Chamber.

The organizations in which Mrs. Matthews has been involved include the following.

Dates

Activities and Responsibilities

1/84 - Present

Jacksonville Branch of the NAACP. Member since 9/83; Subscribing Life Member since 7/88. Elected Executive Board Member, 1/89. The Executive Committee makes policy for the NAACP's 1,000 local members, conducts voter registration drives and community forums, and holds workshops on community issues. Since 1/90, Mrs. Matthews has been Press and Publicity Chairperson for the Branch. She has primary responsibility for insuring that the Branch and its members receive maximum coverage of events by the local and national press. She arranges press conferences, public relations, press releases and photography of all events. Mrs. Matthews devotes approximately eight hours per month to the NAACP.

9/88 - 6/90

Martin Luther King, Jr. Elementary School PTA: Member. Mrs. Matthews devoted approximately one hour per month to the PTA chapter.

11/88 - 6/90

Democratic Committeewoman District 8B: Elected November, 1988. Mrs. Matthews devoted approximately two hours per month to the Party.

4/89 - 4/90

Jacksonville Community Council (JCCI). Member. This group of citizens studies such issues as solid waste, the city's election system, race relations, school desegregation, crime, police/community relations, minority business development, health and housing. Mrs. Matthews was employed for 30 hours per week by JCCI, and she volunteered approximately an additional 10 hours per week to JCCI.

- 6/89 - 12/90 Northwest Council of the Jacksonville Chamber of Commerce 1990. Member since 6/89; Executive Committee Member and Treasurer from 1/90 to 12/90. This business development group is an arm of the 8,000 member Jacksonville Chamber of Commerce. Mrs. Matthews devoted approximately two hours per week to the Chamber.
- 10/89 - Present Jean Ribault Senior High PTA: Member. Mrs. Matthews devotes approximately two hour per month to the PTA chapter.
- 10/89 - Present Duval County Voter Registration Task Force: Active Member since 10/89, working citywide to conduct voter education and registration. Mrs. Matthews devotes approximately one hour per week to the Task Force.
- 1/91 - Present Homework Assistance and Tutoring Program, Abyssinia Baptist Church. Founder and Director. This volunteer program assists children from throughout the county in their schoolwork and instills in them self esteem and positive role models. Mrs. Matthews devotes approximately six hours weekly to the Program.
- 1/91 - Present William Raines High Local School Advisory Council (LSAC). LSAC works with the principal and teachers concerning budgetary, academic, disciplinary and civic matters. Mrs. Matthews devotes approximately three hours per month to LSAC.

D. Broadcast Experience

Mr. Matthews has had substantial broadcast experience, including the following positions:

<u>Dates</u>	<u>Position and Duties</u>
1/72 - 1/81	Studied broadcasting at the Defense Information Institute, Fort Benjamin Harrison, Indiana, while an enlistee in the United States Air Force. Mr. Matthews' military assignments included broadcast work in Iceland, the Phillippines and San Antonio, Texas. While based in San Antonio (intermittently from 5/75 - 12/80) , Mr. Matthews worked with the Aerospace Audiovisual Service where, as a writer, director, producer and on/off camera talent, he was involved primarily with the production of training and promotional materials for Air Force and civilian personnel stationed in the area.
3/80 - 11/80	KSAT-TV, Channel 12, San Antonio, Texas: Weathercaster (16 hours per week)
3/81 - 4/81	WTLV-TV, Channel 12, Jacksonville, Florida: Weathercaster (16 hours per week)
8/81 - 1/82	WCGL-AM, Jacksonville, Florida: Announcer, News Director and Account Executive (25 hours per week)
1/82 - 12/82	WERD-AM, Jacksonville, Florida: Account Executive (fulltime)
1/83 - 10/83	WCGL-AM, Jacksonville, Florida: Operations Manager (fulltime)
10/84 - 7/88	WOKV-AM/WAIV-FM, Jacksonville, Florida: Senior News Reporter, Anchor, Talk Show Host and Producer (fulltime). In 1985, Mr. Matthews received two awards from the Florida Associated Press Broadcasters Association for Outstanding Documentary and Investigative Journalism.
1/87 - 8/87	Edward Waters College, Department of Communications: Associate Instructor. Taught classes in Radio and Television Broadcasting (20 hours per week).

1/89 - Present

Peaches Productions Group, Inc. (PPGI): President (fulltime until 4/90; approximately 20 hours per week thereafter). PPGI is a media services company specializing in producing broadcast and print programs as well as offering services in public relations. Mr. Matthews is Executive Producer of the "Rising Star" television program which first aired four times on WJXT-TV in February, 1989 and which is scheduled to be on the Sunshine Cable Network. Mr. Matthews also publishes The Outlet, PPGI's monthly magazine, and since 1987 has been a weekly columnist in the Jacksonville Advocate Free Press.

4/90 - 3/91

WSVE-AM, Jacksonville. General Manager (fulltime).

Mrs. Matthews has no broadcast station experience, but has media experience transferable to broadcasting, as follows.

Dates

Position and Duties

1/89 - Present

Peaches Productions Group, Inc. (PPGI). As Vice President and Secretary of PPGI, Mrs. Matthews serves as Editor of The Outlet and as Editor of The Black Book: A Minority Business Directory (first published September, 1989). This portion of her duties for PPGI accounts for approximately 30 hours per week.

1/90 - Present

Jacksonville Branch of the NAACP: Press and Publicity Chairperson. Mrs. Matthews has primary responsibility for insuring that the Branch and its members receive maximum coverage of events by the local and national press. She arranges press conferences, public relations, press releases and photography of all events. Mrs. Matthews has spent approximately six hours per month on the Press and Publicity Committee.

DIVERSIFICATION OF MASS MEDIA OWNERSHIP

Neither the applicant, PPGI, or either of the Matthews' has an attributable interest in a medium of mass communications.1/

1/ Peaches' limited partner, UCI, also has no attributable interest in a medium of mass communications. UCI is a limited partner in the following applicants for FM construction permits. In each instance, UCI is an insulated limited partner pursuant to a written limited partnership agreement meeting the Commission's requirements as set out in Attribution Rules (Reconsideration), 58 RR2d 615 (1985).

1. UCI holds a 75% equity interest in Jamal Broadcasting, L.P., an applicant for an FM construction permit to serve Mt. Juliet, Tennessee, File No. BPH-891012MS. Jamal's application was designated for hearing by HDO, DA 91-377 (released April 18, 1991), MM Docket No. 91-84. On May 7, 1991, Jamal noted its appearance for hearing.
2. UCI holds a 75% equity interest in McCoy Communications Limited Partnership, an applicant for an FM construction permit to serve Vancouver, Washington, File No. BPH-890413MA. McCoy's application was designated for hearing by HDO, 5 FCC Rcd 7160 (released November 19, 1990), MM Docket No. 90-418. On December 10, 1990, McCoy noted its appearance for hearing.

UCI formerly held interests in a number of other FM construction permit applications. Peaches does not understand the Prehearing Order, FCC 91M-1455 (released April 26, 1991) to require that these previous interests be reported; however, a list of these former interests will be supplied to any interested party on request.

Dr. James Freemont, a 16.67% stockholder in UCI, is a 50% equity holder and sole limited partner in TFB Associates Limited Partnership ("TFB"). TFB was an applicant for an FM construction permit to serve Hogansville, Georgia, MM Docket No. 90-52, File No. BPH-880602NB. TFB has merged its application into that of T. Wood & Associates, Inc., of which it has a 33% voting equity interest, giving Dr. Freemont, indirectly, a 16.5% equity interest in the merged entity. The merger was approved and the proceeding terminated by MO&O, FCC 91M-791 (released February 28, 1991). TFB is an insulated limited partner pursuant to a written limited partnership agreement meeting the Commission's requirements as set out in Attribution Rules (Reconsideration), supra.

AUXILIARY POWER

Peaches proposes to install auxiliary generators at the studio and transmitter sites in order to supply power in the event of a power failure.

DECLARATION OF FREDERICK MATTHEWS

I, Frederick Matthews, affirm that I have reviewed and approved the foregoing "Integration and Diversification Statement" and that the contents thereof are true and correct to the best of my knowledge.

I declare under penalty of perjury under the laws of the United States of America that the foregoing declaration is true and correct. Executed 1 May 96.

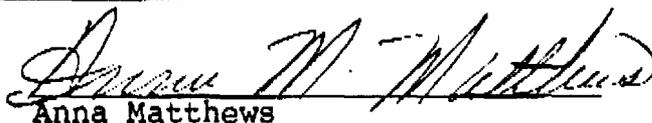


Frederick Matthews

DECLARATION OF ANNA MATTHEWS

I, Anna Matthews, affirm that I have reviewed and approved the foregoing "Integration and Diversification Statement" and that the contents thereof are true and correct to the best of my knowledge.

I declare under penalty of perjury under the laws of the United States of America that the foregoing declaration is true and correct. Executed 5-7-91.


Anna Matthews

CERTIFICATE OF SERVICE

I, David Honig, this 10th day of May, 1991, hereby certify that I have placed in U.S. First Class Mail, postage prepaid, a copy of the foregoing "Integration and Diversification Statement" addressed to the following:

Hon. Edward Luton
Administrative Law Judge
Federal Communications
Commission
2000 L Street N.W.
Washington, D.C. 20554

Y. Paulette Laden, Esq.
FCC Hearing Branch
2025 M Street N.W. #7212
Washington, D.C. 20554

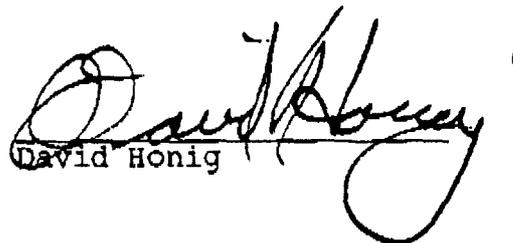
Denise B. Moline, Esq.
McCabe & Allen
9105 Owens Dr.
Manassas Park, VA 22111
Counsel for White

Office of the Chief Counsel
Federal Aviation Administration
800 Independence Ave. S.W.
Suite AGC-230
Washington, D.C. 20591

Arthur V. Belendiuk, Esq.
Smithwick & Belendiuk
2033 M Street N.W.
Washington, D.C. 20036
Counsel for Johnson

James L. Winston, Esq.
Rubin Winston & Diercks
1730 M St. N.W. #412
Washington, D.C. 20036
Counsel for Northeast

Avelino G. Halagao, Esq.
7799 Leesburg Pike #900
Falls Church, VA 22043
Counsel for JEM


David Honig