

LAW OFFICES
VERNER, LIIPFERT, BERNHARD, McPHERSON AND HAND
CHARTERED

JAMES M. VERNER*
EUGENE T. LIIPFERT
EMERITUS

BERL BERNHARD
HARRY MCPHERSON
LLOYD N. HAND*
RONALD B. NATALIE
WILLIAM C. EVANS
MICHAEL J. ROBERTS
FRITZ R. KAHN
BERNHARDT K. WRUBLE
THOMAS J. KELLER
JOHN A. MERRIGAN
JOSEPH L. MANSON, III
WILLIAM H. CRISPIN*
CLINTON A. VINCE
GLEN L. ORTMAN
ERWIN G. KRASNOW
JAMES F. HIBEY
RUSSELL E. POMMER
GEORGE M. FOOTE, JR.*
BUEL WHITE*
WILLIAM F. ROEDER, JR.*
ROY G. BOWMAN
AMY L. BONDURANT
HOPEWELL H. DARNEILLE, III
DOUGLAS OCHS ADLER

RILEY K. TEMPLE*
JOHN P. CAMPBELL*
MICHAEL J. BARTLETT*
DOUGLAS J. COLTON
JOHN H. ZENTAY
FRED W. DROGULA
ANDREA JILL GRANT
GARY J. KLEIN
J. CATHY FOGEL
JOHN B. CONNOR**
LAWRENCE R. SIDMAN
WILLIAM E. KENNARD
BENJAMIN H. FLOWE, JR.
FREDERICK J. TANSILL*
PAUL E. NORDSTROM
SHERRY A. QUIRK
J. RICHARD HAMMETT*
MICHAEL D. GOLDEN
SUSAN O. TEMKIN
JAMES J. BLANCHARD*
WILLIAM A. ZEITLER*
NEIL T. PROTO
LESLIE M. ALDEN*
LAWRENCE Z. LORBER
R. STUART BROOM
ROBERT G. VARNER, JR.
KENNETH S. BARR

SUITE 700
901-15TH STREET, N.W.
WASHINGTON, D.C. 20005-2301
(202) 371-6000

TELEX: 1561792 VERLIP UT
TELECOPIER: (202) 371-6279

HOUSTON OFFICE

6901 TEXAS COMMERCE TOWER
600 TRAVIS
HOUSTON, TEXAS 77002
(713) 237-9034
TELECOPIER: (713) 237-1216

VIRGINIA OFFICES

8280 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22102
(703) 749-6000
TELECOPIER: (703) 749-6027

10484-A ARMSTRONG STREET
FAIRFAX, VIRGINIA 22030
(703) 591-2883
TELECOPIER: (703) 385-7998

TERRENCE J. MCCARTIN
DEAN R. BRENNER
FRANCES C. DELAURENTIS
LAWRENCE N. COOPER*
DON C. LEWIS*
LINDA E. COLLIER*
REBECCA M.J. GOULD*
JOHN S. MOOT
MARK R. LEWIS
SCOTT K. DAINES*
LESLIE B. KRAMERICH*
E. JOHN KRUMHOLTZ
MICHAEL E. BELLER
LISA J. GEFEN
MICHAEL H. TECKLENBURG*
RICHARD J. BIFFL*
SHARI B. GERSTEN*
PETER A. GOULD
WILLIAM E. VINCENT
JOHN B. BRITTON
ANDREW D. ESKIN
MARIE L. MILLER**
GUY A. MORLEY*

BRIAN A. MIZOGUCHI
JOHN R. MIETUS, JR.
BONNIE M. DEUTSCH
JACQUELINE R. KINNEY
KRISTA L. POOL*
JEANETTE M. PABLO
KATHERINE A. ELLIS**
SUSAN G. BLUMENTHAL*
HEDY L. NELSON
GLENN R. MOORE*
BARBARA L. BURTON
DAVID TONG ZHANG*
THOMAS K. JONES**
STUART J. RABIN*
ERIC T. WERNER*
DIANE ULLA MAGE
CHRIS B. WETHERINGTON*
JOHN A. ORDWAY, JR.
BETH WOLFFE
DOUGLAS W. HALL
LISA HARRIS DEAN
J. GREGORY BISHOP

OF COUNSEL

PAUL C. SHEELINE
RICHARD H. SALTSMAN
CHARLENE A. STURBITTS
HOWELL E. BEGLE, JR.
BRUCE A. KIMBLE**
ROBERT W. BLANCHETTE
DOROTHEA SUMMERELL

MARY K. WILLIAMS**
JOSEPH E. BRENNAN*
STEPHEN W. VAN HOOSER*
GENE R. SCHLEPPENBACH*
J. ROBERT KIRK
JAMES K. JACKSON

LOUIS F. BESIO
VICE PRESIDENT FOR
FINANCE AND ADMINISTRATION
WRITER'S DIRECT DIAL NUMBER

* NOT ADMITTED IN DC
* ADMITTED IN VIRGINIA
ADMITTED IN TEXAS

(202) 371-6230

June 23, 1992

RECEIVED

JUN 23 1992

Federal Communications Commission
Office of the Secretary

HAND DELIVERY

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: MM Docket No. 92-81, RM-7875

Dear Ms. Searcy:

Transmitted herewith, on behalf of Pulitzer Broadcasting Company are an original and four copies of the "Reply of Pulitzer Broadcasting Company" in the above-referenced proceeding.

Please file the original, and stamp and return the copy enclosed which is marked for that purpose. In the event there are any questions concerning this matter, please communicate with this office.

Sincerely yours,

Eric T. Werner

Eric T. Werner

Enclosures

cc: Michael C. Ruger, Esq. (w/encl.)

No. of Copies rec'd
List: A B C D E

0+4

ORIGINAL

RECEIVED

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

JUN 23 1992

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Amendment of Section 73.606(b))
Table of Allotments)
Television Broadcast Stations)
(Farmington and Gallup, New Mexico))

MM Docket No. 92-81
RM-7875

TO: Chief, Allocations Branch

REPLY OF PULITZER BROADCASTING COMPANY

Pulitzer Broadcasting Company (hereinafter "Pulitzer"), by its attorneys and pursuant to Sections 1.415 and 1.420 of the Commission's Rules, herewith submits its Reply to the "Comments and/or Counterproposal"^{1/} filed on June 8, 1992 by KOB-TV, Inc. ("KOB") in the above-captioned proceeding.

I. PRELIMINARY STATEMENT

KOB, in addition to being the licensee of Station KOB-TV, Albuquerque, New Mexico, is also the licensee of Station KOB(TV), Farmington, New Mexico. KOB's Comments in this proceeding can only be viewed as a transparent attempt by the dominant licensee in Farmington to preserve its monopoly status at the expense of the public interest. Its eleventh hour expression of interest in Channel 3 and disavowal of interest in vacant Channel 10 evinces less of a desire to serve the people of Gallup than a desire to avoid competition in its home market.

^{1/} Citations will appear as "Comments of KOB-TV at ____."

Moreover, as demonstrated herein, KOB's arguments are so ill-founded and unsubstantiated as seriously to suggest that the pleading was interposed purely for the purpose of delaying the Commission's proper disposition of this matter.

In a fruitless attempt to cast doubt on the merits of Pulitzer's proposed reallocation, KOB advances three arguments: (1) the illusory claim that Gallup would be deprived of potential first service; (2) the suggestion that its hollow expression of interest in Channel 3 forecloses the reallocation; and (3) the desperate and unsubstantiated contention that operation of Channel 3 at Farmington and of Channel 10 at Gallup "could interfere" with secondary translator services in the communities. As demonstrated herein, each of these unsteady legs collapses upon closer examination and does nothing to disturb the conclusion that reallocation of Channel 3 to Farmington would result in the preferable arrangement of allotments.

II. THE AVAILABILITY OF MANY ALTERNATIVE ALLOTMENTS AT GALLUP AND THE NEW SERVICE AND OTHER PUBLIC INTEREST BENEFITS THAT WOULD STEM FROM OPERATION OF CHANNEL 3 AT FARMINGTON CONSTITUTE SIGNIFICANTLY COMPELLING REASONS TO APPROVE THE REALLOTMENT

At the outset, KOB contends that reallocation of Channel 3 to Farmington "would result in a loss of predicted first Grade B service . . . from Station KOAV-TV, as currently authorized." Comments of KOB-TV at 3 (emphasis added). As Pulitzer set forth in its Comments, Comments of Pulitzer Broadcasting Co. at 9-12, Station KOAV-TV "as currently authorized" is not a potential

service for Gallup, and, in any event, the Commission's concern in the reallocation context has historically only included existing services, not potential services. Those arguments need not be restated here.

Nonetheless, even assuming arguendo that loss of potential service were a relevant concern in the reallocation analysis, Gallup will experience no such loss here because Channel 10 remains available for use by an applicant with a bona fide interest in serving that community. Ample evidence exists to cast doubt on the sincerity of KOB's sudden expression of interest in serving Gallup. Channels 3, *8, and 10 were allotted to Gallup almost 40 years ago. Even though KOB-TV was purchased 35 years ago, KOB has evidenced no interest in the community beyond operation of a single translator station. KOB did not challenge Pulitzer's application for Channel 3 in 1989. Against such a backdrop, KOB's asserted concern for first service in Gallup rings hollow indeed. As demonstrated herein, and in the accompanying Engineering Statement, Channel 10 can serve Gallup every bit as effectively as Channel 3. Thus, if KOB truly desires to serve the Gallup, Channel 10 provides it with the opportunity to do so. Moreover, as Pulitzer has previously demonstrated, as many as 43 UHF channels are also available for allotment to Gallup if demand warrants it. Comments of Pulitzer Broadcasting Co. at 8 n.8. Accordingly, removal of Channel 3 can hardly be said to deprive Gallup of an opportunity for potential service.

Perhaps recognizing the weakness of its foregoing claim, KOB next recites the Commission's policy not to reallocate a channel in which interest has been expressed, absent compelling reasons, advancing the specious claim that the substantial first and second services and other benefits the reallocation would produce are not sufficiently "compelling" to overcome its bare expression of interest. Comments of KOB-TV at 5. The validity of KOB's assertion depends, however, upon a mischaracterization of its cited case authority.

In support its claim that its expression of interest in operating Channel 3 at Gallup overcomes the service benefits arising from reallocation of the channel to Farmington, KOB cites Memorandum Opinion and Order in MM Docket No. 87-309 (Montrose and Scranton, Pennsylvania), 5 FCC Rcd 6305, 6306 (1990), parenthetically noting that "(provision of a first local service is not a sufficiently compelling reason to override the FCC's policy not to reallocate a channel for which interest has been expressed)." Comments of KOB-TV at 5. Several critical differences distinguish Montrose and Scranton from the instant case, however.

In Montrose and Scranton, the Policy and Rules Division had denied a petition to reassign vacant UHF Channel 64 from Scranton to Montrose, Pennsylvania, "because two applications for the use of Channel 64 in Scranton had already been filed and were granted cut-off protection almost two months before the release of the Notice of Proposed Rule Making" Montrose and Scranton, 5

FCC Rcd at 6305. The staff found Montrose's status as a county seat without local television service to be inadequate to overcome the policy not to reallocate a channel in which interest has been expressed. Id.

Denying the petitioner's application for review, the Commission stated:

While [petitioner] contends that the reallocation of Channel 64 would result in a first local television service to Montrose, we do not believe that the provision of a first local television service is a sufficiently compelling reason for making the reallocation in this case. We note that there is no replacement channel available for Scranton and we have, at this point in the proceeding, a permittee for Channel 64 that will be able to activate a long-vacant channel. In this case, the value of a first local service is attenuated given the relatively small size of Montrose (1,980).

Id. at 6360 (emphasis added).

These facts stand in sharp contrast to the facts of the instant case. First, unlike the case in Montrose and Scranton, here KOB expressed no interest in operating in Gallup until after the Commission issued a Notice of Proposed Rule Making inviting comments on Pulitzer's reallocation proposal. Second, the first service Pulitzer's proposed reallocation will bring to Farmington (3,366 persons within a 3,162 square kilometer area) far exceeds the first service proposed for Montrose. Moreover, this significant first service will be accompanied by an even greater second service -- providing more than 67,000 persons with their first broadcast alternative to Station KOB-TV. Finally, and most critically, the Commission emphasized that no replacement

channel existed for Channel 64 at Scranton; however, here Channel 10 stands vacant and ready to be activated as a replacement for Channel 3 and numerous UHF channels could also be allotted to Gallup as replacements.

Unlike the "attenuated" first service showing in Scranton and Montrose, the substantial service benefits to be derived from reallocation of Channel 3, coupled with the availability of numerous replacement channels in Gallup, clearly provides a compelling basis to approve the reallocation, particularly in the face of KOB's belated and questionable showing of interest. Applying the policy as KOB urges in this case would not serve the public interest. It would permit any licensee to block a preferential reallocation of a channel that would introduce competition into the licensee's market.

III. OPERATION OF CHANNEL 3 AT FARMINGTON AND OF CHANNEL 10 AT GALLUP WILL HAVE NO APPRECIABLE EFFECT ON TRANSLATOR SERVICE IN THE TWO COMMUNITIES

Finally, KOB asserts a claim based on the purported effect of the reallocation on translator services in Gallup and Farmington. Comments of KOB-TV at 6. KOB acknowledges that "translators are secondary and the FCC does not normally take them into account in making changes in the TV Table of Allotments under Section 74.702(b)"; nonetheless, KOB essentially claims that, all other factors being equal, the Commission should consider translators in this case because of the alleged

interference they would experience and "the unavailability of other over-the-air or cable services" Id.

As an initial matter, Pulitzer has already clearly demonstrated that all other factors are not equal in this case: Section 307(b) considerations and the Commission's allotment priorities favor the proposed reallocation. Moreover, KOB's statement that no cable service is available in Gallup is flatly wrong. As Pulitzer indicated in its Petition for Rule Making, Gallup is served by a cable television system. The system, operated by United Artists, carries 27 channels on its basic tier of service, including the following local regional broadcast television stations from Albuquerque: KGGM-TV; KGSW-TV; KNME-TV; KOAT-TV; and KOB-TV. For these reasons alone, the Commission need not depart from its policy of ignoring translators in its reallocation analysis.

Nonetheless, turning to the merits of the claim, KOB's argument withers under scrutiny. KOB asserts that as many as 57 translators "could" be "potentially affected." Id. As the attached Engineering Statement reveals, this claim can only be described as a gross exaggeration. In point of fact, the operation of Channel 3 at Farmington will adversely affect none of the 25 translators identified by KOB. Engineering Statement, App. at 2-3. Moreover, KOB's claim that 32 translators could be affected by activation of Channel 10 at Gallup is equally misleading. Id. at 4. Engineering analysis indicates that only one translator would definitely be displaced by Channel 10, and

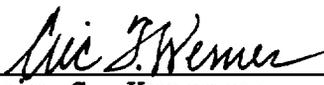
that two more would require further study. Id. at 4-5. In any event, as previously stated, sufficient channels remain available for allotment to Gallup to accommodate any of the three translators that might be displaced by operation of Channel 10. Accordingly, KOB's translator argument provides no support for its opposition to use of Channel 10 and likewise cannot overcome the substantial public benefits that reallocation of Channel 3 to Farmington would produce.

IV. CONCLUSION

For the foregoing reasons, the Commission should reject KOB's counterproposal as contrary to the public interest, and should reallocate Channel 3 from Gallup to Farmington, New Mexico, and modify Pulitzer's construction permit for Channel 3 accordingly to specify Farmington as its community of license.

Respectfully submitted,

PULITZER BROADCASTING COMPANY

By: 
Erwin G. Krasnow
Eric T. Werner

Verner, Liipfert, Bernhard,
McPherson and Hand, Chartered
901 Fifteenth Street, N.W.
Washington, D.C. 20005-2301
(202) 371-6000

Its Attorneys

June 23, 1992

**ENGINEERING STATEMENT
IN SUPPORT OF REPLY COMMENTS OF
PULITZER BROADCASTING COMPANY
STATION KOAV(TV)
GALLUP, NEW MEXICO
MM DOCKET NO. 92-81**

This engineering statement was prepared on behalf of Pulitzer Broadcasting Company (Pulitzer), permittee of station KOAV, Gallup New Mexico, in support of reply comments in MM Docket No. 92-81.¹ In its *Petition for Rule Making*, Pulitzer requested reallocation of Channel 3 from Gallup to Farmington, New Mexico, as the community's second VHF television service, and the modification of the construction permit for its station KOAV to specify Farmington in lieu of Gallup as the community of license. Use of Channel 3 at Farmington would meet the minimum distance separation requirements of Section 73.610 of the FCC's Rules.

In its comments filed in response to the *Notice of Proposed Rule Making* in this Docket, Pulitzer provided the FCC with additional information supporting its claim of first and second local service that would be provided were Channel 3 to be reallocated from Gallup to Farmington. Those comments demonstrated that implementation of the Pulitzer plan would provide a first TV service to 3,366 persons in 3,162 square kilometers and a second TV service to 67,444 persons in 10,176 square kilometers. Pulitzer's comments also stated that use of Channel 3 at Farmington would be more cost effective, more environmentally sound, and less burdensome on the public than any other alternative.

Comments were also filed in this matter by KOB-TV, Inc. (KOB), licensee of KOB-TV, Albuquerque, and KOBF(TV), Farmington, both New Mexico. KOB argues that transmigration of

¹ See *Amendment of Section 73.606(b), Table of Allotments, Television Broadcast Stations (Farmington and Gallup, New Mexico)*, RM-7875, released April 16, 1992.

JULES COHEN & ASSOCIATES, P.C.

CONSULTING ELECTRONICS ENGINEERS

WASHINGTON, D.C. 20036

Engineering Statement
KOAV, Gallup, New Mexico

Page 2

Channel 3 from Gallup to Farmington would create a "white area," that the reallocation would cause disruption to existing translator service, and that Pulitzer has failed to demonstrate the feasibility of its proposal. KOB also states its intent to operate Channel 3 at Gallup if the FCC fails to grant Pulitzer's Petition. KOB's comments on the Pulitzer proposal make a frail attempt to cast aspersions on technical matters related to the operation of Channel 3 at Farmington. These reply comments will show that KOB's technical comments are presumptive at best and lack any basis under the Rules.

Reallocation of Channel 3 from Gallup to Farmington would not create a "white area" because no station currently operates on Channel 3 at Gallup. If Gallup now has no service on Channel 3, then there can be no loss of service if that channel is reallocated to Farmington.

Despite the provision of Section 74.702(b) of the FCC's Rules which allows for changes in the TV Table of Allotments without regard for existing or proposed TV translator stations, KOB identifies those TV translators potentially affected by activation of Channel 3 at Farmington. The engineering statement accompanying KOB's comments states, "...the activation of channel 3 at Farmington could adversely affect 25 licensed TV translator stations," yet no engineering data are provided to support this claim. In fact, only one translator station, K02HM, Allison-Arboles, Colorado, would be affected by activation of Channel 3 at Farmington, and that translator rebroadcasts the signal of Pulitzer's station KOAT-TV, Albuquerque, an ABC affiliate. Pulitzer anticipates the shut down of K02HM if its proposal is adopted because that translator's protected service area lies entirely within the Grade B contour of the proposed KOAV facility. Accordingly, those persons now served by K02HM would be served by KOAV.

None of the other translators identified by KOB as potentially being affected by use of Channel 3 at Farmington would actually be affected under the Rules. All translators operating on Channel 2 are more than 92 kilometers away from the proposed KOAV site. Operating with effective radiated power of 100 kilowatts and antenna radiation center height above average terrain of 150

meters, the 74 dBu, F(50,50) interfering contour would extend only 31 kilometers toward the Channel 2 translators. Assuming conservatively that the distance to the protected 62 dBu, F(50,50) contour for all of the translators is 10 kilometers, no question of prohibited contour overlap arises. Likewise, with respect to the Channel 4 translators, the 68 dBu F(50,50) interfering contour for the proposed KOAV facility would extend only 42 kilometers toward the closest Channel 4 translator which is located 177 kilometers away. Again, there is no question of prohibited contour overlap.

For the cochannel translators, either distance or terrain eliminates any potential for interference. The 17 dBu, F(50,10) interfering contour for the proposed KOAV facility extends 291 kilometers. The closest translator outside of the interfering contour is K03FR, La Veta, Colorado, located 296 kilometers away. K03FR operates with effective radiated power of 6 watts and antenna radiation center height of 2384 meters above mean sea level (AMSL). The average terrain elevation at the K03FR site, based on 36 evenly spaced radials, is 2691 meters AMSL. Thus, the translator's radiation center is 310 meters below average terrain. Certainly a translator located that far below the surrounding terrain will not be affected by the operation of KOAV at Farmington some 296 kilometers away. The other cochannel translators located outside the KOAV interfering contour are simply too far away to be affected.

Finally, no line-of-sight path exists between the proposed KOAV site and the six cochannel translators located between 147 and 251 kilometers away. The terrain between the proposed KOAV site and these translators rises to above 4000 meters AMSL, some 2000 meters above the proposed KOAV radiation center. This formidable terrain obstruction will prevent interference being caused to these translators by the proposed operation of KOAV. From the foregoing, it is clear that activation of Channel 3 at Farmington will have no effect on any translator that is to remain in operation.

KOB's comments also identify those TV translators potentially affected by activation of Channel 10 at Gallup. This list is as misleading as the previously discussed list of TV translators potentially affected by activation of Channel 3 at Farmington. Assuming operation on Channel 10 at Gallup with effective radiated power of 316 kilowatts and antenna radiation center height above average terrain of 150 meters, closer scrutiny of the list of potentially affected translators reveals only a few that will be affected.

Eleven of the 32 translators identified by KOB as being affected by activation of Channel 10 at Gallup are located well beyond the radio horizon of the assumed Channel 10 facility and therefore would not be affected. Assuming the facilities specified above and uniform intervening terrain, the distance to the radio horizon is 194 kilometers and 11 of the 32 translators identified are at least 215 kilometers from the Channel 10 reference coordinates.

Of the remaining 21 translators, 15 operate on adjacent channels and are located far enough away that no question of prohibited contour overlap arises using a uniform terrain assumption. Terrain obstructions between the Channel 10 reference site and many of these translators mitigate the potential for interference to an even greater extent.

This leaves a total of six translators that will be affected by activation of Channel 10 at Gallup. Of these 6, one rebroadcasts the signal of KOB-TV and two rebroadcast the signal of KOAT-TV. Presumably if KOB were to operate a station of Channel 10 at Gallup, there would be no need for K09NA, Sheep Springs, New Mexico, to rebroadcast the signal of KOB-TV. Pulitzer would cooperate with the licensees of K10IN, Chinle, Arizona, and K10CG, Aztec and Cedar Hill, New Mexico, in the event those translators are displaced.

Of the remaining 3 translators, only one is located inside the Grade B contour of assumed Channel 10 facility at Gallup and certainly would be displaced. The remaining two are

JULES COHEN & ASSOCIATES, P.C.

CONSULTING ELECTRONICS ENGINEERS

WASHINGTON, D.C. 20036

Engineering Statement
KOAV, Gallup, New Mexico

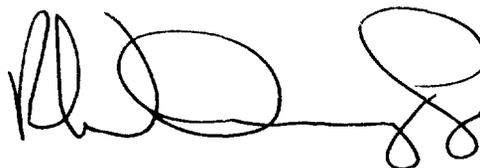
Page 5

located far enough outside the Grade B contour that further study is needed to determine if rechanneling would be necessary. Certainly, Channel 10 at Gallup should not lie fallow simply because one translator will be displaced and two others may be displaced. Given the low effective radiated power used by all of the translators identified by KOB and their limited protected service areas arising from the use of directional antennas, no problems are expected in rechanneling any translator displaced by activation of Channel 10 at Gallup.

With respect to the feasibility of constructing a Channel 3 facility at Farmington, Pulitzer is not aware of any impediments that would prevent construction of the proposed facility. It is a trivial matter to achieve effective radiated power of 100 kilowatts at Channel 3. To achieve antenna radiation center height above average terrain of 150 meters at the proposed site using a typical 3-bay batwing antenna, a tower height of about 113 meters (371 feet) above ground level would be sufficient. Such a tower could be designed and erected easily.

Turning now to KOB's desire to operate a television station at Gallup, it is not necessary for the FCC to consider the KOB counterproposal in this proceeding because a second channel is available at Gallup. Channel 10 at Gallup is unused, and there are no pending applications for that channel. Rather than advancing a mutually exclusive counterproposal in this proceeding, KOB needs only to apply for Channel 10 to realize its goal of operating a television station at Gallup.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 22, 1992.

A handwritten signature in black ink, appearing to read "Robert W. Denny, Jr.", with a stylized flourish at the end.

Robert W. Denny, Jr., P.E.

CERTIFICATE OF SERVICE

I, Donna M. DiMuro, a secretary for the law firm of Verner, Liipfert, Bernhard, McPherson and Hand, Chartered, do hereby certify that a copy of the foregoing "Reply of Pulitzer Broadcasting Company" was delivered by hand this 23rd day of June, 1992 to:

Michael C. Ruger, Esq.
Chief, Allocations Branch
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W.
Room 8322
Washington, D.C. 20554

and by first class mail, postage prepaid to:

Marvin Rosenberg, Esq.
Mania K. Baghdadi, Esq.
Fletcher, Heald & Hildreth
1225 Connecticut Avenue, N.W.
Suite 400
Washington, D.C. 20036

Attorneys for KOB-TV, Inc.



Donna M. DiMuro

Dated: June 23, 1992