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JUL 10 1992

Federal Communications Commission
Office of the Secretary

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

RE: MM Docket No. 92-81, RM-7875
Farmington and Gallup, New Mexico

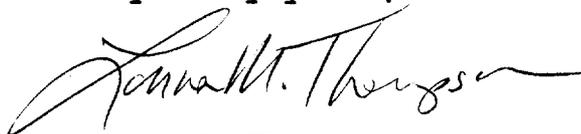
ORIGINAL
FILE

Dear Ms. Searcy:

Transmitted herewith, on behalf of KOB-TV, Inc., are an original and four copies of its "Supplement to Reply Comments" in MM Docket No. 92-81.

Should any questions arise concerning this filing, please communicate with this office.

Very truly yours,



Lonna M. Thompson

LMT/bl1

Enclosures

cc: Mr. Michael C. Ruger, FCC (w/enc.) (by hand)
Erwin G. Krasnow, Esquire (w/enc.)

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

RECEIVED

JUL 10 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	MM Docket No. 92-81
)	RM-7875
Amendment of Section 73.606(b))	
Table of Allotments)	
Television Broadcast Stations)	
(Farmington and Gallup, New Mexico))	

Directed to: Chief, Allocations Branch

SUPPLEMENT TO REPLY COMMENTS

KOB-TV, Inc., ("KOB"), licensee of Stations KOB-TV, Albuquerque, New Mexico, and KOB(TV), Farmington, New Mexico, by its counsel, hereby files its "Supplement to Reply Comments" ("Supplement") in the above-captioned proceeding.¹

I. The Proposed Reassignment will Disrupt Translators

In its June 23, 1992 "Reply of Pulitzer Broadcasting Company" ("Reply"), Pulitzer Broadcasting Company ("Pulitzer") argued that KOB has grossly exaggerated the disruption to existing translators that would result from reassignment of Channel 3 to Farmington and activation of Channel 10 at Gallup. Reply, p. 7. However, as the Technical Statement of W. Jeffrey Reynolds, attached hereto as Exhibit 1, demonstrates, use of Channel 3 at Farmington would interfere with the operation of more licensed TV translator stations than would its use at Gallup. Moreover, if KOB were to apply for Channel 10 at Gallup instead of Channel 3, this would interfere with many more

¹ Simultaneously herewith, KOB is filing a Motion for Leave to File Supplement to Reply Comments.

licensed TV translators than would the use of Channel 3. Thus, Channel 3 should be retained at Gallup.

II. The FCC Must Reject Pulitzer's Attack on KOB's Motives

In a vain attempt to deflect the Commission's attention from the failure to demonstrate that the public interest warrants the reassignment of Channel 3 from Gallup to Farmington, Pulitzer, in its Reply, attacked and mischaracterized KOB's motives in participating in this proceeding. Pulitzer questions KOB's interest in serving Gallup on Channel 3, arguing that KOB's interest in serving Gallup did not manifest itself until after the FCC had requested comments on Pulitzer's proposal, and that, rather than genuinely seeking to serve Gallup, KOB is only trying to prevent Pulitzer from competing with KOB's station in Farmington. As will be shown herein, however, Pulitzer's allegations are unfounded.²

KOB's actions are based on its own goal of serving Gallup.³ KOB's interest in Channel 3 at Gallup is long-standing. In 1985, KOB attempted to purchase the construction permit for the Channel 3 station at Gallup from William H. Graham, et al., d/b/a

² It is noteworthy that KOB has not urged the Commission to deny outright Pulitzer's request to move to Farmington.

³ KOB's interest in serving Gallup is clearly evidenced by its office currently maintained at Gallup, which employs a news person to provide local news and other information. Attached as Exhibit 2 hereto is a copy of a letter to KOB from Peterson Zah, President of the Navajo Nation, applauding the operation of the Gallup news bureau.

McKinley County Television ("McKinley"), which was the permittee of a television station on Channel 3 at Gallup, with the intent of establishing a satellite to retransmit the programming of Station KOB-TV, Albuquerque, New Mexico, to Gallup.⁴ The attempt, unfortunately, failed.⁵

Pulitzer argues that KOB's failure to file a competing application for Channel 3 at Gallup in 1989 is evidence that KOB's interest in serving Gallup is not genuine. Reply, p. 3. However, that assertion is false. KOB did not file a competing application for a construction permit for a new television station on Channel 3 in Gallup in 1989 because KOB believed that filing such an application would be fruitless. It was KOB's judgment that it could not prevail over Pulitzer in a comparative hearing because KOB feared that it would receive a significant comparative demerit for diversification⁶ because it already had three other full-power New Mexico television stations, two of

⁴ In September, 1985, KOB sent William H. Graham, a general partner of McKinley, for signature, a proposed option agreement for purchase of the Channel 3 construction permit, executed by KOB, along with a check in the amount of \$1000 made out to Chapman Associates, a media broker, to cover the cost of the option. A copy of the proposed option agreement is attached hereto as Exhibit 3.

⁵ For reasons unknown to KOB, the proposed option agreement was not signed by McKinley, and no agreement was reached on the proposed sale despite KOB's offer.

⁶ Under the Commission's Policy Statement on Comparative Broadcast Hearings, 1 FCC2d 393, 394 (1965), diversification is a factor of primary significance in broadcast comparative hearings.

which were satellites.⁷ By contrast, KOAT had two New Mexico television stations, including one satellite.⁸ KOB saw no point to a protracted hearing proceeding that would have resulted from its filing a competing application for Channel 3 at Gallup, particularly since it did not have reason to believe it could prevail comparatively.

In fact, KOB had already been through a similar encounter with Pulitzer when KOB tried to upgrade its television translator station on Channel 10 at Silver City, New Mexico, into a new satellite television station. On April 11, 1985, KOB filed an application for a construction permit for a new television station on Channel 10 at Silver City, New Mexico, to operate as a satellite of KOB-TV, Albuquerque. KOB already operated commercial television translator station K10KF on Channel 10, Silver City. Indeed, Hubbard Broadcasting, Inc., KOB's parent, had successfully petitioned the Commission to correct an error in the Commission's Table of Allotments which showed Channel 10 as reserved for non-commercial educational in order to permit the filing of an application for a commercial television station.

⁷ In addition to KOB-TV and KOB-TV, licensed to KOB, the Stanley S. Hubbard Revocable Trust, a related entity, is the licensee of Station KOB-TV, Roswell, New Mexico.

⁸ In October 1989, when KOAT Television, Inc. ("KOAT"), a subsidiary of Pulitzer, filed its application for construction permit for a new television station on Channel 3 at Gallup, it listed itself as the licensee of two full-power television stations in New Mexico: KOAT-TV, Albuquerque and KWNM-TV, Silver City. Additionally, a related entity, Phoenix Broadcasting, Inc., was the licensee of KTAR(AM) and KKLTV(FM), Phoenix, Arizona. See Exhibit 1 to the KOAT Gallup application, attached hereto as Exhibit 4.

See Report and Order in BC Docket No. 78-46, BC4025, released September 12, 1978.

On June 5, 1985, KOAT filed a competing application for a new commercial television station on Channel 10. Thereupon, based on its view that it could not prevail in a comparative hearing against KOAT because it feared a significant diversification demerit as against Pulitzer/KOAT,⁹ KOB entered into a settlement agreement with KOAT pursuant to which it agreed to dismiss its Silver City Channel 10 application. KOB obtained no monetary consideration for the dismissal, but KOAT agreed to assign its translator station on Channel 6 in Silver City to KOB. See Exhibit 6 hereto. Based on that experience, in which KOB was required to change the frequency of its translator and was not reimbursed for any of the legal, engineering and other expenses it expended in correcting the Channel 10 reservation and filing and prosecuting its application for Channel 10 at Silver City, KOB decided to forego filing a competing application for Channel 3 at Gallup. Therefore, KOB's forbearance is not to be construed as a lack of interest, but rather an exercise of prudence based

⁹ In Exhibit 3 to its Silver City application, KOAT stated that it owned only one other full-power television station in New Mexico, KOAT-TV. See Exhibit 5 hereto. In contrast, KOB, at the time of the filing of the Silver City application was the licensee of KOB(AM) and KOB-FM, Albuquerque, as well as full-power commercial television stations at Farmington (a satellite) and Albuquerque. The Stanley S. Hubbard Revocable Trust, a related entity, also had an application pending for the assignment to it of the license of the Channel 8 station in Roswell, New Mexico, which was granted on July 22, 1985. See FCC Public Notice, Report No. 19574, released August 6, 1985.

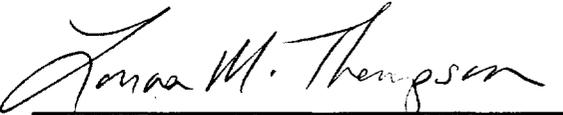
on experience.

The FCC must recognize Pulitzer's attack on KOB's motives as unfounded and nothing more than a diversionary tactic. The FCC must focus instead on the public interest, which mandates retention of Channel 3 in Gallup. Indeed, while the FCC has expressed concern about abuse of the allotment process, it has concluded that the best way to deal with potential abuse is to treat expressions of interest as representations to the Commission, to limit payments for withdrawal of expressions of interest, and to subject those who make expressions of interest without the requisite intent to construct and operate the proposed facility to appropriate administrative sanctions, including forfeitures. Report and Order in MM Docket No. 87-314, 5 FCC Rcd 3911, 3914-15 (1990), recon. denied, 6 FCC Rcd 3380 (1991). The Commission has stated that a question might be raised as to whether a party is advancing proposals in good faith "where there is either direct evidence of misrepresentation, or evidence of a pattern of filings in which a party expresses an interest in an allotment and either voluntarily dismisses its proposal prior to action in the allotment proceeding or fails to file an application...." Id., 5 FCC Rcd at 3915. Here, there is no evidence of misrepresentation or pattern of misconduct, only baseless accusations.

Accordingly, for the foregoing reasons, KOB-TV, Inc. respectfully urges the FCC to retain Channel 3 at Gallup and to allot a new UHF channel at Farmington.

Respectfully submitted,

KOB-TV, INC.

By: 

Marvin Rosenberg
Mania K. Baghdadi
Lonna M. Thompson

Its Attorneys

FLETCHER, HEALD & HILDRETH
1225 Connecticut Avenue, N.W.
Suite 400
Washington, D.C. 20036
(202)828-5700

July 10, 1992

L-1.Supp.78

EXHIBIT 1

TECHNICAL STATEMENT
IN SUPPORT OF THE SUPPLEMENTAL COMMENTS OF
KOB-TV INC.
FARMINGTON AND GALLUP, NEW MEXICO

This technical statement and associated exhibits have been prepared on behalf of KOB-TV Inc. (KOB-TV) in support of supplemental comments in the Federal Communications Commission's Notice of Proposed Rule Making in MM Docket No. 92-81 (Docket). KOB-TV is the licensee of TV Stations KOB-TV, channel 4, Albuquerque, New Mexico and KOB-F, channel 12, Farmington, New Mexico.

The Docket was issued in response to a request from Pulitzer Broadcasting Company (Pulitzer), permittee of TV Station KOAV, Channel 3, Gallup, New Mexico, and proposes the reallocation of channel 3 from Gallup to Farmington and the modification of the construction permit (FCC File No. BPCT-891010KG) of KOAV to specify Farmington as its community of license. Comments and reply comments were filed by KOB-TV. Pulitzer filed comments, reply comments and supplemental comments.

Translator Service Disruption

As noted in the KOB-TV Comments, based on the criteria contained in paragraph 26 of the Report and Order in BC Docket No. 78-253 (An Inquiry into the Future Role of Low Power Television Broadcasting and Television Translators in the National Telecommunications System) the activation of channel 3 at Farmington could adversely

affect 25 licensed TV translator stations and the activation of channel 10 at Gallup could adversely affect 32 licensed TV translator stations. Conversely, activation of the authorized KOAV operation on channel 3 at Gallup could adversely affect 13 licensed TV translator stations. Potential adverse effects to the licensed stations include required facility modifications such as channel changes. The actual adverse effects depend on the facilities implemented by the full service stations.

In its reply comments, Pulitzer alleges that only 1 TV translator station (K02HM, Allison-Arboles, Colorado) would be affected by the activation of channel 3 at Farmington, and that none of the other 24 licensed TV translator stations identified by KOB-TV would be affected under the Rules. Furthermore, Pulitzer alleges that only 6 of the 32 TV translator stations identified by KOB-TV as being potentially affected by activation of channel 10 at Gallup would actually be affected under the Rules. The Pulitzer analysis utilized hypothetical facilities for the proposed channel 3 operation at Farmington (ERP 100 kW, HAAT 150 meters) and the proposed channel 10 operation at Gallup (ERP 316 kW, HAAT 150 meters).

Pulitzer's analysis only considered interference "received" by the TV translator stations, not interference "caused" to the proposed full service stations at Farmington and Gallup. The Commission's Rules concerning prohibited interference by TV translator stations to other TV translator and full service stations are contained in Sections 74.705 and 74.707. Whereas TV translator

stations are permitted to "receive" interference, except in the case of mutually exclusive applications, they are absolutely prohibited from "causing" interference to full-service TV stations under these Sections. It would be at the licensee's discretion to alleviate instances of "received" interference. However, the FCC requires TV translator stations involved in prohibited interference being "caused" to full-service stations to modify facilities to eliminate the interference.

The Commission utilizes a computer program entitled "LPONE"¹ to determine if a TV translator station is involved in prohibited interference under Sections 74.705 and 74.707 of the Rules. This program was used to determine the number of licensed TV translator stations that would be adversely affected using the hypothetical facilities proposed by Pulitzer for channel 3 at Farmington (ERP 100 kW, HAAT 150 meters) and channel 10 at Gallup (ERP 316 kW, HAAT 150 meters), and the authorized KOAV facilities (ERP 24 kW, HAAT 31 meters) at Gallup. Figure 1 tabulates each affected TV translator station, its facilities and whether the type of objectionable interference involved was "caused" or "received". As shown, using LPONE and the hypothetical facilities proposed by Pulitzer, the activation of channel 3 at Farmington would result in 7 TV translator stations being involved in interference "caused" and 6 involved in interference "received". Furthermore, activation of

¹LPONE program written by John Boursy, November 1982; modified by Nai Tam August 30, 1988 and January 17, 1989.

channel 10 at Gallup would result in 12 TV translator stations being involved in interference "caused" and 10 involved in interference "received". Finally, activation of the authorized KOAV operation on channel 3 at Gallup would result in 3 TV translator stations being involved in interference "caused" and 1 involved in interference "received".

In its reply comments, KOB-TV provided an analysis of the availability of Grade B TV services to the areas that would gain and lose service based on the hypothetical site/facilities assumed by Pulitzer in the Docket. Furthermore, KOB-TV noted that the Grade B contour of KCHF on channel 11 at Santa Fe was omitted from the Pulitzer analysis of the availability of other services in both its Petition and Comments. It was also noted that the Commission's standard prediction method was used to determine contour locations. The Pulitzer supplemental comments allege that KOB-TV ignored the effect of terrain obstructions on KCHF and KKTO on channel 2 at Santa Fe, New Mexico. However, as explained in the Reply Comments of KOB-TV, rather than ignoring the effect of terrain obstructions, use of signal propagation methods other than the Commission's standard prediction method was considered inappropriate for allotment proceedings based on the Commission's refusal to consider such use in the Notice of Proposed Rule Making in MM Docket No. 89-68.

Pulitzer included maps in its petition and comments which depicted Grade B services available to the gain and loss areas. Examination of these maps indicates that terrain obstructions were also not considered by

du Treil, Lundin & Rackley, Inc.

A Subsidiary of A. D. Ring, P. C.

Page 5

Farmington and Gallup, New Mexico

Pulitzer in depicting the location of the KKTO Grade B contour. Rather, it is apparent that the Commission's standard prediction method was utilized in both instances.

W. Jeffrey Reynolds

W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
1019 19th Street, N.W., Suite 300
Washington, D.C. 20036
(202) 223-6700

July 9, 1992

TECHNICAL STATEMENT
IN SUPPORT OF THE SUPPLEMENTAL COMMENTS OF
KOB-TV INC.
FARMINGTON AND GALLUP, NEW MEXICO

TV Translator Stations Potentially Affected
by Adoption of the Pulitzer Reallocation Proposal Based on
The Commission's LPONE Program

I. Licensed TV Translator Stations Potentially Affected
by Channel 3 Activation at Farmington

<u>Call/Location</u>	<u>Facilities</u>	<u>Objectionable Interference</u>	
		<u>Caused</u>	<u>Received</u>
K02HM, Allison-Arboles, CO	CH 2, 0.007 kW DA	X	
K04NK, Dolores, CO	CH 4, 0.005 kW DA	X	
K02EH, Ute Park, NM	CH 2, 0.137 kW DA	X	
K02ET, Vallecito, CO	CH 2, 0.038 kW DA	X	
K03FX, Placerville, CO	CH 3, 0.02 kW DA	X	X
K03AY, Ridgway, CO	CH 3, 0.022 kW DA	X	X
K03FQ, Uravan, CO	CH 3, 0.007 kW DA		X
K03CO, Alamosa, CO	CH 3, 0.136 kW DA	X	X
K03EY, Doyleville, CO	CH 3, 0.003 kW DA		X
K03FR, La Veta, CO	CH 3, 0.006 kW DA		X
	Totals	7	6

II. Licensed TV Translator Stations Potentially Affected
by Channel 10 Activation at Gallup

<u>Call/Location</u>	<u>Facilities</u>	<u>Objectionable Interference</u>	
		<u>Caused</u>	<u>Received</u>
K10IR, Gallup, NM	CH 10, 0.356 kW D	X	X
K09NA, Sheep Springs, NM	CH 9, 0.104 kW DA	X	
K09FR, Zuni Pueblo, NM	CH 9, 0.01 kW DA	X	
K11CD, Zuni Pueblo, NM	CH 11, 0.013 kW DA	X	
K11JF, Ramah, NM	CH 11, 0.006 kW DA	X	
K11II, Crownpoint, NM	CH 11, 0.001 kW ND	X	
K09OI, Ganado, AZ	CH 9, 0.281 kW DA	X	
K11KY, Ganado, AZ	CH 11, 0.009 kW DA	X	
K10KT, Greasewood, AZ	CH 10, 0.009 kW DA	X	X
K10IN, Chinle, AZ	CH 10, 0.1 kW DA	X	
K10EO, North Chinle, AZ	CH 10, 0.208 kW DA	X	X
K10CG, Aztec/Cedar Hill, NM	CH 10, 0.087 kW DA	X	X
K10MZ, Dolores, CO	CH 10, 0.005 kW DA		X
K10MG, Socorro, NM	CH 10, 0.170 kW DA		X
K10AD, Vallecito, CO	CH 10, 0.057 kW DA		X
K10DO, Chromo, CO	CH 10, 0.003 kW DA		X
K10GO, Pagosa Springs, CO	CH 10, 0.008 kW DA		X
K10DQ, Monticello, UT	CH 10, 0.015 kW DA		X
	Totals	12	10

III. Licensed TV Translator Stations Potentially Affected
 by authorized KOAV Channel 3 operation at Gallup

<u>Call/Location</u>	<u>Facilities</u>	<u>Objectionable Interference</u>	
		<u>Caused</u>	<u>Received</u>
K02EY, Zuni, NM	CH 2, 0.012 kW DA	X	
K04DV, Navajo, NM	CH 4, 0.007 kW DA	X	
K03FB, Snowflake, AZ	CH 3, 0.027 kW DA	<u>X</u>	<u>X</u>
	Totals	3	1

EXHIBIT 2

THE NAVAJO NATION

P. O. DRAWER 308 • WINDOW ROCK, ARIZONA 86615 • (602) 871-8382-55

PETERSON ZAH
PRESIDENT

JUL 08 1992

MARSHALL PLUMMER
VICE PRESIDENT

Steve Henderson, Manager
KOB-TV

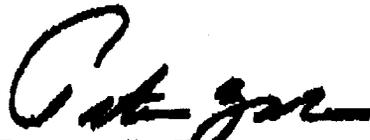
Dear Mr. Henderson:

I just wanted to take the time to say that since KOB-TV has established a news bureau in Gallup, the Navajo people and the Navajo Nation have benefitted from the increased coverage of news and events of interest to our local region. I personally know Denise Beconti and she has done a good job collecting news for your television station.

As we all know, an informed public is important for our society and therefore I welcomed the addition of your Gallup news bureau. As a leader, I am heartened by the increased awareness of issues close to home, and I hope you will be able to expand your coverage of news of interest to the Navajo people. It would also be beneficial to hear the Navajo language in your television newscast.

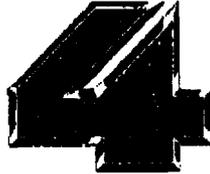
Keep up the good work.

Sincerely,
THE NAVAJO NATION



Peterson Zah
President

EXHIBIT 3



KOB Television

(505)243-4411 • P.O. Box 1351 • Albuquerque, N.M. 87103

September 6, 1985

Mr. William H. Graham
1210 West Avenue J
Lovington, New Mexico

Mr. Graham, enclosed is the original and duplicate original that needs to be signed and dated by all partners. Please note that pages 3 and 4 both are the places for signatures. Please return the original to me and retain the duplicate original for your files.

Also enclosed is a check for \$1,000.00 made out Chapman Association.

If you have any questions, please do not hesitate to call.

Jerry Danziger
Vice President/General Manager

JERRY DANZIGER
VICE PRESIDENT/GENERAL MANAGER

OPTION AGREEMENT

THIS OPTION AGREEMENT, made this _____ day of September, 1985, by and between WILLIAM H. GRAHAM, et al, a general partnership, d/b/a McKinley County Television, Box 1, Lovington, New Mexico (hereinafter "Owner"), and KOB-TV, INC., a Minnesota corporation, Albuquerque, New Mexico (hereinafter "Purchaser").

WITNESSETH

WHEREAS, the Owner, a general partnership organized under the laws of the State of New Mexico, doing business as McKinley County Television, and consisting of the following general partners:

William H. Graham
1210 West Avenue J
Lovington, New Mexico

Eddie M. Robinson
1214 West Avenue H
Lovington, New Mexico

Dorothy Runnels
1210 West Avenue J
Lovington, New Mexico

Cecilia R. Masters
3400 Box Canyon
Gallup, New Mexico

Nathan R. Berke
726 Camino Del Mar
San Francisco, California

is the grantee of a Television Broadcast Station Construction Permit assigned to Gallup, New Mexico, by the Federal Communications Commission ("FCC"), as more particularly appears on Exhibit A, attached hereto and made a part hereof by reference; and

WHEREAS, Purchaser desires to establish a satellite television station in Gallup, New Mexico, to transmit the programming of its television station KOB-TV, Albuquerque, New Mexico; and

WHEREAS, Purchaser desires to acquire an option to purchase from the Owner its

rights in the aforesaid construction permit on the terms and conditions hereinafter set forth.

NOW, THEREFORE, in consideration of the sum of One Thousand Dollars (\$1,000.00) paid by Purchaser to Owner, the receipt and sufficiency of which is hereby acknowledged by the Owner, the Owner hereby grants to Purchaser an irrevocable option to purchase the Owner's rights, subject to approval of the Federal Communications Commission, in that certain Television Broadcast Station Construction Permit as is more particularly described in Exhibit A, and such other permits and authorizations Owner may have to be used, required for, or intended for the operation of a television station on the operating assignment Channel 3, Gallup, New Mexico.

The purchase price of the Owner's rights to Channel 3, Gallup, New Mexico, shall be on such terms, conditions and price as the parties hereto mutually agree upon. It is agreed that the parties will enter into "good faith" negotiations as to the fair market value of the Owner's rights to and in Channel 3.

The option granted to Purchaser herein shall expire on November 30, 1985. The \$1,000.00 heretofore received shall be credited to the purchase price when the option is exercised. In the event the Federal Communications Commission does not grant an extension to Owner of its required completion of construction date (September 12, 1985), then and in that event, the \$1,000.00 option consideration shall be returned to Purchaser forthwith.

If the option to purchase is exercised in accordance with the terms and conditions to be mutually agreed upon, the Owner and Purchaser will enter into a separate sales agreement within thirty (30) days of the exercise of the option by the Purchaser. The purchase agreement will provide that the assignment/transfer of the FCC construction permit shall be contingent upon securing the required approval from the Federal Communications Commission and any other governmental or regulatory body from whom permission or consent is required.

The purchase agreement to be signed upon exercise of the option shall contain a provision providing that the closing of the assignment/transfer/sale shall take place within two (2) weeks of FCC approval of the license transfer and both Owner and Purchaser do hereby agree to use their best efforts to expedite such approvals as they are required.

Notices to be given or served hereunder shall be deemed duly served if personally mailed by registered or certified mail:

To The Owner: William H. Graham
McKinley County Television
Box 1
Lovington, New Mexico 88260

To The Purchaser: Jerry Danziger, Vice President
KOB-TV, Inc.
4 Broadcast Plaza S.W.
Albuquerque, New Mexico 87103

or at such other address as either party shall designate to the other by written notice.

This Option Agreement shall be binding upon and shall inure to the benefit of the successors and assigns of the parties.

IN WITNESS WHEREOF, the parties have caused this option to be executed the day and year first above written.

McKINLEY COUNTY TELEVISION
(A General Partnership)

Dated: _____

William H. Graham, General Partner

Dated: _____

Eddie M. Robinson, General Partner

Dated: _____

Dorothy Runnels, General Partner

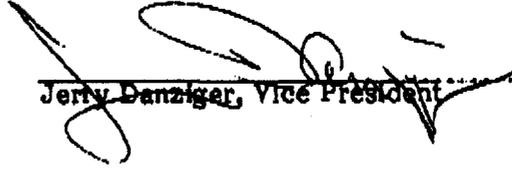
Dated: _____

Cecilia R. Masters, General Partner

Dated: _____

Nathan R. Berke, General Partner

KOB-TV, INC.



Jerry Danziger, Vice President