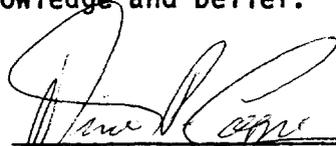


AFFIDAVIT

My name is Dino Cagni and during the mid 1980's I was the Executive Director of the Palm Beach-Martin County Medical Center (commonly known as Jupiter Hospital). During that time Jupiter Hospital produced a series of radio programs called "Here's to Your Health." These programs were broadcast for 30 minutes each Saturday morning from 10:00am to 10:30am on WWSI AM-FM (later called WIXI, WKSX and WTRU) while the station was under the management of Robert Taylor. This series ran for 52 consecutive weeks during the period September 1984 to September 1985. At the beginning of the series, Jupiter Hospital paid a production fee to WWSI to underwrite the cost of the airtime. There were no commercials in the 30 minute broadcast. We used an interview format in which Pat McGowan of Jupiter Hospital acted as host/moderator in a discussion each week about health issues with one or more guests who were usually health care professionals from Jupiter Hospital. The program was oriented toward current medical information as a service to the listener and was not designed to be an advertisement for Jupiter Hospital. As administrator of the hospital, I remember receiving positive comments about the program at that time.

I understand that this statement may be submitted to the Federal Communications Commission.

I declare under penalty of perjury that all of the foregoing statements are true and correct to my knowledge and belief.



Dino Cagni

dated: _____

8/12/92

ROBERT B. TAYLOR
EXHIBIT No. 7

ASCERTAINMENT EFFORTS OF JUPITER AM-FM STATIONS
DURING THE PERIOD OCTOBER 1984 THROUGH MARCH 1987

During the license period, WTRU (FM) and WEXI (AM) used the following informal methods to ascertain problems and needs in Jupiter and surrounding communities:

- a) Paid membership in the Jupiter-Tequesta-Juno Beach Chamber of Commerce. The president of the stations' licensee, Robert Taylor, as well as members of the stations' sales staff attended card exchanges and other Chamber sponsored events. During these meetings conversations occurred between community leaders and station staffers regarding local issues and needs.
- b) Interaction between station staffers and local business persons occurred often in the course of meetings at local businesses to set up and prepare radio advertising campaigns. These discussions often involved local issues. Later during informal meetings back at the stations' offices, the sales staffers would brief Robert Taylor as to the nature of comments made by these local business leaders.
- c) Interaction by telephone between station staffers and the listening public on local issues and news topics often occurred. The stations maintained local phone lines plus at extra cost leased a 546 number so listeners in neighboring Martin County could call the stations toll free.
- d) Jan Davisson. The stations had an informal working relationship with Jan Davisson whereby Jan would maintain

continuing contact with many local community leaders, ascertain local needs and issues, then conduct interviews with some of these leaders which were broadcast on the stations. Jan was a longtime Jupiter resident who operated her own public relations firm in the community. Robert Taylor and Jan Davisson spent many hours talking about people in Jupiter as well as discussing local issues, problems and needs.

- e) Local newscasts. The stations broadcast daily local newscasts with an emphasis on frequent newscasts during morning drive time. Station staffers gathered news by reviewing various local and regional newspapers, and by monitoring television and all-news radio station news reports. The stations sometimes obtained important local news leads from listeners calling in. News staffers also attended local news conferences. With these contacts, many local issues and needs were ascertained by station staff.
- f) As a college graduate, a fluent reader, and having a keen interest in Jupiter as a community in which he owned a business, Robert Taylor kept himself aware of community issues and needs by reading the local print media and listening and watching the local broadcast media.

Local Problems Ascertained

Clean-up of Jones Creek

Traffic on Indiantown Road / Building of I 95 Interchange

Sunrise Collapse - Lots of funds for Paul Thompson's Calle Viejo Project

FPL Wire Electrocution of 7 people in Troy Hulks Family on 3/22/85 in Jupiter

Jupiter Inlet District - Requests for softball fields

Speedboats killing manatees

Widening of Indiantown Road

New Bridge over Intracoastal at Indiantown Road

Competing in Bed Race in Jupiter for charity - Summer 1986

Aftermath of death of daughter of school board member, Gail Bjork, in car accident in Center Street.

Election of Tom Lewis to Congress

Business problems of Mayor Mary Hinton

National Problems

AIDS

Crime Prevention

Cancer Prevention

Drug Abuse

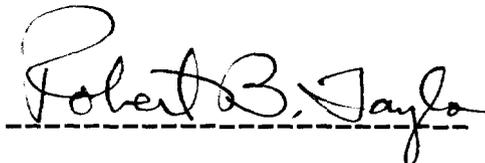
Alcohol Abuse

DECLARATION

I, Robert B. Taylor, state under penalty of perjury that:

1. I have reviewed the foregoing Robert B. Taylor Exhibit No. 7 entitled "Ascertainment Efforts of Jupiter AM-FM Stations During the Period October 1984 Through March 1987" which constitutes my direct testimony in this proceeding.

2. The statements made in the referenced exhibit are true and correct to the best of my knowledge and belief.

A handwritten signature in cursive script that reads "Robert B. Taylor". The signature is written in black ink and is positioned above a horizontal dashed line.

Robert B. Taylor

August 21, 1992

ROBERT B. TAYLOR
EXHIBIT NO. 8

Public Affairs Programming

Community Calendar and "Happenings" Programs

The stations broadcast a series of Community Calendar PSA programs and/or a PSA program entitled "Happenings", which was 90 seconds in duration, from November 1984 through October 1986 which provided information on community events, organization meetings and local government meetings, at which community issues were on the agenda. The Community Calendar PSA's were approximately 60 seconds in length. The number of those programs which were aired per month are as follows:

<u>1984</u>	<u>1985</u>	<u>1986</u>	
November: 39	January: 31	March: 193	July: 173
December: 25	February: 40	April: 237	Aug: 260
	March: 34	May: 246	Sept: 203
		June: 240	Oct: 150

60 Seconds on Nutrition

Jupiter AM-FM "60 Seconds On Nutrition", Public Affairs Program, Aired Weekdays at 1:00 p.m., Duration One Minute Each, Number Aired:

<u>1984</u>	<u>1985</u>
November: 23	January: 11
December: 18	February: 19
	March: 19

Good Health to You

Locally produced by WTRU and Jupiter Hospital, 30 minute duration, aired weekly 10:00 to 10:30 AM each Saturday. The format was interviews and round table discussions on health issues with one or more guests who were doctors, nurses and other health care professionals. It contained no commercial matter or other breaks. It aired for 52 consecutive weeks from September 1984 to September 1985. It appears in the available program logs only from 11/3/84 to 8/24/85.

January 1986

Planned Parenthood - 3
Sierra Club - 1

February 1986

Palm Beach Chamber of Commerce (Crime Prevention) - 1
Smoking Clinic - 1
Help the Hungry at Home - 2

March 1986

Help the Hungry at Home - 2
Jupiter Business and Professional Women's Club - 8
Tornado Watch Announcement - 1
Job Service of Florida - 6

April 1986

AMI - Palm Beach Gardens Medical - Breast Cancer - 1
Planned Parenthood - 2
Humane Society - 3
Animal Rescue League - 3
Palm Beach Junior College (AIDS) - 1

May 1986

AIDS Symposium - Palm Beach Junior College - 4
Humane Society - 5
Animal Rescue League - 3
Job Service of Florida - 9
Hands Across Palm Beach County -114
Hands Across America - 1
Literacy Workshop - 3
M.A.D.D. - 9
Hurricane Promo - 2

June 1986

Hurricane Promo - 23
Job Service of Florida - 7

July 1986

Hurricane Promo - 5
Cocaine - 20
Job Service of Florida - 3

August 1986

Cocaine - 1
Hurricane Promo - 14
New Horizons Drug Treatment - 9

September 1986

Hurricane Promo - 6
Crisis Line - 6
New Horizons Drug Treatment - 8
Stress Management - Good Samaritan Hospital - 1

Banned Books - 1

October 1986

Crisis Line/ Dial A Friend - 12

New Horizons Drug Treatment - 12

Hurricane - 2

Ocean Impact Foundation - 2

November 1986

New Horizons - 5

Crisis Line - 3

Great American Smoke-Out - 1

Ocean Impact Foundation - 1

Hurricane Promo - 1

December 1986

New Horizons - 3

Marine Mammal - Ocean Impact Foundation - 1

Crisis Line - 3

Call-a-Cab - Palm Beach-Martin Hospital - 5

Don't Drink & Drive - M.A.D.D. - 1

January 1987

Call a Cab - 3

Crisis Line - 2

Alcohol Abuse - 1

February 1987

YMCA/Rape Prevention - 4

BURT
REYNOLDS

Jupiter Theatre

1001 E. Indiantown Road
Jupiter, Florida 33458-5191

December 9, 1986

WKSJ KOSY 97 FM
500 North Delaware Boulevard
Jupiter, Florida 33458

Attention: Ms. Sherri L. McKing
Office Manager

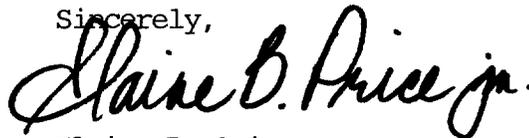
Dear Ms. McKin:

We are pleased to donate a gift certificate for two to be used as an auction item in conjunction with your December 10, 1986, "Make-A-Wish Foundation" fund raiser at Parker's Lighthouse in North Palm Beach.

Please read the gift certificate carefully as certain conditions do apply.

Best wishes for a very successful event.

Sincerely,



Elaine B. Price
Executive Director

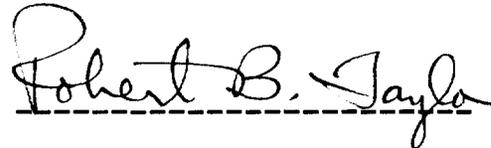
EBP:jm
cc: on file
encl.

DECLARATION

I, Robert B. Taylor, state under penalty of perjury that:

1. I have reviewed the foregoing Robert B. Taylor Exhibit No. 8 entitled "Public Affairs Programming" which constitutes my direct testimony in this proceeding.

2. The statements made in the referenced exhibit are true and correct to the best of my knowledge and belief.

A handwritten signature in cursive script that reads "Robert B. Taylor". The signature is written in black ink and is positioned above a horizontal dashed line.

Robert B. Taylor

August 21, 1992

ROBERT B. TAYLOR

EXHIBIT No. 9

DECLARATION OF ROBERT B. TAYLOR RE: Strike Threat

The paragraph cited by JBC in the December 9, 1991 comes at the end of a three page letter dealing with my business proposal to JBC. At that time, I was very frustrated by the long delay in the renewal process. I wanted them to know I was going to defend my licenses and would consider applying for the TV license to stay in the broadcast business in the Jupiter area. When I wrote the letter of December 9, 1991, I did not view my statement concerning possibly filing a TV application as a threat to file a "strike" application. I was totally unaware of the filing deadline for TV applications.

I had heard that someone named Potamkin was behind the Jupiter Broadcasting ("JBC") application, but I did not know who this person was or how he was tied to JBC. I went to check the WPBF public file in January 1992 because I had heard that a "Potamkin" was involved in that station. I wanted to see what was in the file and to find out who was involved in the station, but this was long after the letter was written.

After the public file visit, I wrote to Alan Potamkin asking for a meeting because I had come to the conclusion that he had to be the "Potamkin" connected to JBC because he had a Miami address. In response to my letter to Mr. Potamkin, JBC counsel telephoned to set up a meeting. I attended a meeting in Miami on January 20, 1992 with Paul Levine and counsel in which I tried to find out from them if it was true that Alan Potamkin had a connection with JBC. They denied that Mr. Potamkin had any connection. I did not find out the nature of Alan Potamkin's connection as an option holder until I received the JBC petition to enlarge issues.

JBC states that my letter was a threat "calculated to have the maximum impact on settlement". However, there were no settlement discussions going on and the next contact between me and JBC was about a month later, well after the date that JBC has given as the date for the filing of Florida television station renewal applications.

I never anticipated that my letter would be interpreted as a threat to file a "strike" application. It was not intended as such.

Federal Communications Commission	
Docket No. <u>92-114</u>	Exhibit No. <u>9</u>
Filed by <u>RBT</u>	
Disposition <u>9</u>	Identified <u>✓</u>
	Received <u>✓</u>
	Rejected <u>_____</u>
Report	
Date <u>0 11 Sept 92</u>	

DECLARATION

I, Robert B. Taylor, state under penalty of perjury that:

1. I have reviewed the foregoing Robert B. Taylor Exhibit No. 9
entitled: " Declaration of Robert B. Taylor Re: Strike
Threat",

which constitutes my direct testimony in this proceeding.

2. The referenced exhibit is true and correct to the best of
my knowledge and belief.


Robert B. Taylor

dated: AUGUST 17, 1992

ROBERT B. TAYLOR

EXHIBIT NO. 10

DECLARATION OF ROBERT B. TAYLOR RE: Management Contracts

I made a decision to change the format of WTRU to a "Spanish International" format because of the positive response the station received to a Sunday Spanish language program which was hosted by Mr. Jaime Garza. I viewed the Spanish format as one that would meet a need in the area and at the same time be commercially successful. I entered into a management contract (with the title "Air Time Lease") with Ramon Hernandez in January 1991 which was later revised in April 1991 and was named "Management Contract". This contract was terminated in June 1991. I entered into a management contract with Jaime Garza dated June 26, 1991. Mr. Garza currently manages the station under the agreement.

In the contracts, both Mr. Hernandez and Mr. Garza were given the normal responsibilities of a General Manager with the aim of taking the steps needed to carry out the Spanish format. However, they were independent contractors and not employees. Mr. Garza (and Mr. Hernandez) is paid in the form of 50% of the gross revenues.

Mr. Garza hires and pays the personnel but all of the agreements specified that I was responsible for maintaining broadcast studios and transmitting equipment and for paying the cost of real property taxes and personal property taxes, ASCAP/BMI fees, basic telephone service, electricity, insurance coverages, and payment of mortgages. The equipment in use at the station such as transmitter, antenna, monitors, etc. is equipment owned by me.

The station has been operated under these agreements with the understanding that I retained oversight responsibility for the operation. All three of the contracts specifically state that "The operation and programming of WTRU will remain under the control of the lessor at all times." All of the contracts contain language that requires a minimum of three PSAs per day and the broadcast of interviews with community leaders. The Garza contract is for no specific term and is terminable at will.

During the months when I am in Florida, I live in an apartment that is located right in the station studio building, and thus, I am there every day. All of the employees are bilingual and I have regular contact with them during these times. When I go to Michigan for the summer months, I maintain contact with Mr. Garza to discuss payment of accounts and other matters, and he has been instructed to, and does, telephone when there is any problem including equipment malfunctions or the need to repair equipment. I contact the contract engineer to arrange for equipment repairs.

DECLARATION

I, Robert B. Taylor, state under penalty of perjury that:

1. I have reviewed the foregoing Robert B. Taylor Exhibit No. 10 entitled: " Declaration of Robert B. Taylor Re: Management Contracts",

which constitutes my direct testimony in this proceeding.

2. The referenced exhibit is true and correct to the best of my knowledge and belief.


Robert B. Taylor

dated: AUGUST 17, 1992

ROBERT B. TAYLOR

EXHIBIT NO. 11

DECLARATION OF ROBERT B. TAYLOR RE: 73.3523 ALLEGATIONS

Jupiter Broacasting ("JBC") has alleged that my December 9, 1991 letter was an offer to draft settlement agreements with JBC that did not mention the FCC in an attempt to conceal the terms of a settlement from the FCC.

The fact is that I had proposed a business plan to Mr. Levine in a November 18, 1991 letter under which Taylor and JBC would form a joint venture on a 50-50 partnership basis. My November 18 letter made no reference to FCC settlement regulations, but simply set forth a plan for JBC and Taylor to operate the station together.

In a phone conversation, Mr. Levine informed me that such an arrangement might not be acceptable as a settlement. I stated in my letter responding to that conversation that "as I mentioned Tuesday, I don't think my Nov. 18 business plan proposal is linked to an FCC settlement." I viewed a settlement agreement as one in which I would be seeking to get JBC to dismiss their application in return for payment of money. I was proposing that neither of the parties would walk away but unite to operate the stations. When I stated that "I would be willing to sign an affidavit stating that there was no linkage", it was because I believed that there was no linkage. However, it was clear that I was trying to formulate an acceptable approach because I also suggested that another possibility was to file a settlement agreement with the out-of-pocket expenses being paid by means of the JBC consultant contract.

The purpose of my discussion in my December 9, 1991 letter was to brainstorm to find an acceptable approach to join in a workable business arrangement. There was no attempt on my part to suggest that the parties should take steps to evade FCC settlement restrictions. I was seeking an approach that would be acceptable under FCC regulations. I never suggested that we enter into any agreement that would violate commission rules.

Federal Communications Commission	
Docket No. <u>95-114</u>	Exhibit No. <u>11</u>
Presented by <u>R.B.T.</u>	
Disposition	Identified <input checked="" type="checkbox"/>
	Received <input checked="" type="checkbox"/>
	Rejected <input type="checkbox"/>
Reporter <u>[Signature]</u>	
Date <u>11 Sept 92</u>	

DECLARATION

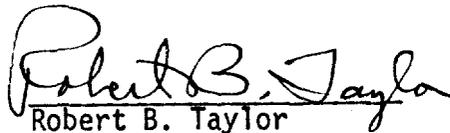
I, Robert B. Taylor, state under penalty of perjury that:

1. I have reviewed the foregoing Robert B. Taylor Exhibit No. 11
entitled: "Declaration of Robert B. Taylor Re: 73.3523

Allegations",

which constitutes my direct testimony in this proceeding.

2. The referenced exhibit is true and correct to the best of
my knowledge and belief.


Robert B. Taylor

dated: AUGUST 17, 1992