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January 6, 1993

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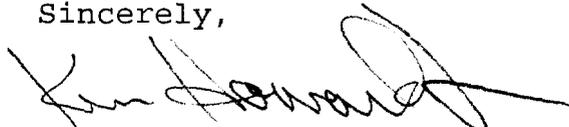
Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, DC 20554

Re: Request by TV14, Inc. to Amend Section 76.51
MM Docket No. 92-295, RM-8016

Dear Ms. Searcy:

Submitted herewith for filing in the above-described proceeding are the comments of Scripps Howard Cable of Northwest Georgia ("Scripps Howard"). Scripps Howard supports amendment of the Commission's rules to change the designation of the Atlanta, Georgia, television market to "Atlanta-Rome, Georgia." If you require additional information, please contact the undersigned.

Sincerely,



Kenneth C. Howard, Jr.
Counsel to Scripps Howard Cable
of Northwest Georgia

0749:2789

Attachment

cc: F. Steven Crawford
Neal F. Fondren

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List A B C D E

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NEAL F. FONDREN
GENERAL MANAGER

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 **SCRIPPS HOWARD CABLE
OF NORTHWEST GEORGIA**

January 6, 1993

Ms. Donna Searcy, Secretary
Federal Communications Commission
Washington, D.C. 20554

RE: MM Docket No. 92-295, RM-8016

Dear Ms. Searcy:

I am the General Manager for Scripps Howard Cable of Northwest Georgia (Scripps Howard), the cable system serving the Rome, Georgia community and surrounding areas. I am writing to offer the following comments in regard to the proposed rulemaking that would make Rome, Georgia part of the Atlanta market. I support the rulemaking and offer the following perspective with respect to the perception of the Rome, Georgia community. Please consider the following:

1. The Rome, Georgia community considers itself part of the Atlanta metro area already. There is much trade to and from Rome. The Atlanta based stations are considered to be local by most residents in the Rome, Georgia market.
2. Atlanta stations consider Rome to be a part of the Atlanta market. The majority of the Atlanta stations include the Rome, Georgia area in their sales efforts, and Atlanta stations are very active in their demands to be carried "on channel" on Scripps Howard's cable television system. Under the new legislation, several would be must carry stations as part of the Atlanta ADI. One station, WXIA, provides a full-time news bureau in the Rome area. It is very clear that Atlanta based stations consider Rome as part of their television market.
3. Scripps Howard presently assumes a liability for importing stations considered to be distant under copyright law but which are perceived as local by the community at large. While Atlanta cable operators are reluctant to assume a copyright liability for WTLK under the present market configuration, Scripps Howard has assumed copyright liability for the importation of almost all Atlanta based stations. Under the proposed rulemaking, Atlanta based stations would be local to Rome and could be carried without penalty. A case in point is that of WVEU TV-69, who has requested carriage on Scripps Howard's Rome, Georgia cable system. This station could not be grandfathered under the existing market situation and could not be carried without payment to the copyright office of 3.75% of the cable system's gross revenues. During the past basketball season, we were unable to provide our customers with ACC basketball because of the extreme liability that would have resulted. Customers, not having an understanding of copyright law, were angry. Inclusion into the Atlanta market would open the door for carriage of other important programming out of the Atlanta market. The case presented by WTLK could just as easily be made on the behalf of WVEU.

Ms. Donna Searcy, Secretary
Federal Communications Commission
January 6, 1993

In summation, it is clearly warranted that Rome, Georgia should be included as a part of the Atlanta, Georgia market. Thank you for your consideration.



Neal F. Fondren
General Manager
Scripps Howard, Northwest Georgia

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