

illegal behavior hardly qualifies as "reasonable". That would restrict a federal candidate's right to broadcast an ad that may be arguably indecent or obscene while giving greater leeway to non-federal candidates to express the same opinion in such a manner. On the other hand, a right of access for a federal candidate under Section 312(a)(7) appears to have a preferred status (CBS, Inc. v. FCC, 453 U.S. 367 (1981)) which, it can be argued, should allow it to express an opinion free of censorship by the licensee, even at the cost of violating 18 U.S.C. § 1464. Such casuistic distinctions, however, ignore the basic purpose of the political broadcasting provisions of the Communications Act, which is both to allow all candidates some access to broadcast media for political discussion and, at the same time, to ban indecent and obscene speech. Licensees should not be further burdened with the necessity of making such legalistic distinctions and should be allowed, in good faith, reasonably to conclude, based upon all factors with which they may be confronted, whether to allow certain types of expression by political candidates that raise questions of illegality under 18 U.S.C. § 1464. Those factors could include the nature of the questionable speech, the nature of the candidacy, the issues that have been ventilated in the campaign and the office to which the candidate aspires. No blanket rule that differentiates among candidates for these purposes would serve the overall public interest and appropriately recognize the

journalistic function which licensees must initially be allowed to perform under the statute.

VI. Licensees Must Be Free to Ban Indecent or Obscene Political Messages Completely. Labelling and Channelling Are Insufficient Protection In All Circumstances for the Harm That Otherwise May Occur By Broadcast of Such Advertisements.

The Commission has also suggested that certain anti-abortion political ads that are particularly shocking may nonetheless be required to be broadcast in light of the no-censorship provision of Section 315(a), but could be labelled in advance in order to forewarn the audience of the nature of the material that will follow. Channelling such ads to periods of time in the broadcast day when children are not likely to be in the viewing audience was approved by the District Court in the WAGA-TV case and is now allowable as an interim measure by the Commission. LTBC views each of these options as insufficiently-responsive alternatives. Children may be found in the viewing audience at any time of the day or night. As indicated above, other sensitive viewer groups, including adults who have experienced the tragedy of a loss of a child or miscarriage of a pregnancy, can be severely impacted by exposure to such ads at a particularly vulnerable time in their lives. The judgments of the licensees, reasonably made, in light of all the relevant factors, including the best of advice they can bring to the issue from their communities, should be respected and neither labelling or channelling should be viewed as acceptable

alternatives to a good faith determination by a licensee not to accept, on any basis, certain ads which not only may be criminally indecent or obscene, but also may raise substantial public interest concerns for their communities.

VII. The Commission Should Respect Good Faith Judgments of Licensees Regarding the Acceptance of Arguably Illegal Ads Without Further Proof.

LTBC has to this point in its comments accepted and argued that a line should be drawn that allows licensees to refuse to broadcast ads that would violate 18 U.S.C. § 1464. It may, however, actually be the case that in many instances a conclusive judicial determination as to whether a particular ad would violate 18 U.S.C. § 1464 cannot be made. Time constraints, the pace of a political campaign, the inability to obtain a conclusive judicial ruling, and the inherently vague nature of the inquiry as to whether certain material is "obscene" or "indecent", makes it less than likely that a conclusive case will be in hand that a particular ad would violate 18 U.S.C. § 1464. Nonetheless, so long as the licensee is acting in good faith and has made a reasonable determination that the particular ad likely raises a serious question concerning potential violation of 18 U.S.C. § 1464, that decision should be respected if the licensee also makes a good faith determination that the public interest would not be served by providing access for such an ad. Various cases can be imagined where, by virtue of the nature of the political ad, the ad may

escape the judgment that it violated 18 U.S.C. § 1464 but nonetheless raise serious public interest questions for a licensee. LTBC is not urging that the licensee should be allowed to impose its subjective judgment as to what serves the public interest in reviewing political ads in general. However, when that judgment of the licensee coincides with serious questions concerning the indecent or obscene nature, for example, of the ad, the Commission should not attempt to make fine legal distinctions in reviewing the good faith discretion of the licensee. Such a process would do much to chill the journalistic independence and discretion of licensees and would raise serious questions concerning the role of the Commission as set forth above.

VIII. The Commission Should Adopt a Protocol That Defers to the Good Faith Reasonable Discretion of Licensees To Accept or Reject Political Ads To Avoid Serious Questions Regarding the Constitutionality of the Communications Act, as Applied.

LTBC has urged here that the Commission should adopt a procedure of deferring to the reasonable good faith exercise of discretion by licensees when they determine to accept or reject political ads which raise issues under 18 U.S.C. § 1464. We have argued that the Communications Act and important principles of constitutional dimensions extend to broadcasters the journalistic responsibility for making these decisions. LTBC believes, in addition, that the failure of the Commission to respect the good faith exercise of discretion by licensees would raise serious

questions regarding the constitutionality of the applicable provisions of the Communications Act. While the Commission does not have the authority to pass upon the constitutionality of the Communications Act, it ought to take account of constitutional values and the desirability of avoiding serious constitutional questions in assessing its role and the manner in which the Communications Act should be implemented.

In Red Lion Broadcasting Co. v. FCC, 395 U.S. 367, 386 (1969), the Supreme Court recognized that "Although broadcasting is clearly a medium affected by a First Amendment interest, United States v. Paramount Pictures, Inc., 334 U.S. 131, 166, 68 S. Ct. 915, 933, 92 L. Ed. 1260 (1948), differences in the characteristics of new media justify differences in the First Amendment standards applied to them." At the same time, the Court in Red Lion expressly held "that the First Amendment is [not] irrelevant to public broadcasting. On the contrary, it has a major role to play as the Congress itself recognized in Section 326, which forbids FCC interference with "the right of free speech by means of radio communication." 395 U.S. at 389-390. As against these values, the Court upheld the constitutionality of the Fairness Doctrine, resting in large part on the scarcity of broadcast frequencies as justification for government regulation under the First Amendment, and held that "the government is permitted to put restraints on licensees in favor of others whose views should be expressed on

this unique medium. . . . It is the right of the viewers and listeners, not the right of the broadcasters, which is paramount." 395 U.S. at 390. Notwithstanding this holding, the factual predicate upon which at least part of its decision rests has been largely undercut in recent years. Scarcity can no longer justify government control of the content of broadcasting such as embodied in Section 315.^{13/} The tension between the Supreme Court's holding in Red Lion and its holdings with regard to the absolute First Amendment rights of the print media, Miami Herald Publishing Co. v. Tornillo, 418 U.S. 241 (1974); Mills v. Alabama, 384 U.S. 214 (1966), yet remains to be resolved.

The Commission would exacerbate that tension between the Red Lion approach to content regulation of the broadcast media and the journalistic freedom otherwise enjoyed by the print media (particularly in the area of political expression) were it to assume a power to decide in the first instance the manner in which broadcasters should discharge their journalistic function to accept or reject the political ads at issue here. The desirability of

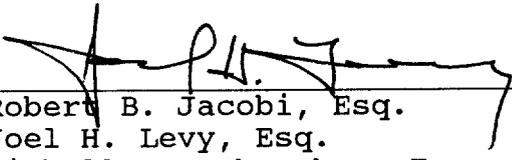
^{13/} The Commission itself has relied in major part upon the diminished if not complete elimination of scarcity as grounds for administrative repeal of the Fairness Doctrine. See Syracuse Peace Council v. FCC, 867 F.2d 654, 661 (D.C. Cir. 1989). We are now in an age in which the prospect of as many as 500 separate media voices can be delivered by wire to the home of individual subscribers as well as through compressed broadcast signals and satellite delivered radio and television services.

avoiding such serious constitutional questions counsels strongly in favor of the approach which has been urged by LTBC.^{14/}

Respectfully submitted

LOUISIANA TELEVISION BROADCASTING CORP.

By:


Robert B. Jacobi, Esq.
Joel H. Levy, Esq.
Michelle M. Shanahan, Esq.

Cohn and Marks
1333 New Hampshire Avenue, N.W.
Suite 600
Washington, D.C. 20036
(202) 293-3860
Its Attorneys

January 22, 1993

^{14/} LTBC reserves the right to urge that the provisions of the Communications Act in issue here are unconstitutional and represent an unwarranted imposition upon the constitutional rights of broadcasters, listeners, and viewers under the First Amendment, whatever the nature of FCC review of the exercise of licensee discretion that may be implemented here.

EXHIBIT A

C. J O H N C A S K E Y
a professional law corporation

Baton Rouge

September 29, 1992

Mr. Milton Gross
Chief, Political Program Branch
Federal Communications Commission
1919 M Street, N.W. -- Room 8202
Washington, D.C. 20554

RE: Administrative Complaint pursuant to
47 U.S.C. Section 315 against WBRZ-TV,
Louisiana Television Broadcasting,
Post Office Box 2906, Baton Rouge, LA
70821

Dear Mr. Gross:

The undersigned represents The Reverend Kim Carmouche of Baton Rouge, Louisiana, who is a candidate for the office of Mayor-President for the Parish of East Baton Rouge. This Administrative Complaint processed against a local television station is made on an urgent basis pursuant to 47 U.S.C. Section 315 inasmuch as the election is scheduled for October 3, 1992.

History of the Complaint

The Reverend Kim Carmouche declared his candidacy for the office of Mayor-President of Baton Rouge on August 20, 1992, on a platform of family values and "right-to-life" including opposition to abortion. Exhibit "A". His announced opponent was incumbent Mayor-President, Tom Ed McHugh. Reverend Carmouche prepared six 30-second spots in support of his "Carmouche for Life for Mayor" campaign. Four of the five local television and cable stations in the Greater Baton Rouge area approached by Reverend Carmouche agreed to air all six 30-second spots (unedited and uncensored) for the customary fee.

Reverend Carmouche's opponent, Tom Ed McHugh, entered into an extensive contract with WBRZ Channel 2-TV owned by the Louisiana Television Broadcasting Corporation, to air a series of the Mayor-President's own 30-second campaign spots. Exhibit "B". On Wednesday, September 23, 1992, The Reverend Carmouche met with Mr. John Pellerin, Sales Representative of WBRZ-TV and asked the station to air his six prepared 30-second spots just as the television station had aired the spots of his incumbent opponent. The initial response of Mr. Pellerin

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Mr. Milton Gross
September 29, 1992

was favorable. The Reverend Carmouche was quoted a price by Mr. Pellerin of \$3,208.75 to run the spots, and Reverend Carmouche rendered his check to the station. Exhibit "C". Reverend Carmouche was told that his campaign spots would begin August 24 and run through October 2, 1992.

Reverend Carmouche was subsequently contacted by Mr. Pellerin (before any of the spots were aired) and told that the owner of the station, Mr. Richard Manship, had viewed the six spots and determined that they were "not suitable to his viewing audience." Thus, Reverend Carmouche was told that the station would not run any of the spots based on the content of the message. On Tuesday, September 29, 1992, the controversy caught the attention of the local newspaper in Baton Rouge, The Advocate. Exhibit "D". In the newspaper article, Mr. Manship is quoted as acknowledging "federal law" requiring equal opportunities to candidates for public office to utilize broadcasting stations, but also as alleging that he had the right to "censor a candidate's broadcast when it contains obscene matter or violates the federal criminal code." The ads were said to have too graphically have illustrated the abortion controversy.

After the article in The Advocate appeared, The Reverend Carmouche had occasion to speak by telephone with Mr. Pellerin, who announced that WBRZ-TV had modified its position so as to agree to air spots 1 and 6 of the series but that the television station continued to refuse to air spots 2, 3, 4 & 5. Reverend Carmouche was given back by the station all six tape spots as well as his check.

Complaint

The Reverend Carmouche, in relying on the clear wording of 47 U.S.C. Section 315(a), charges WBRZ-TV with intentionally refusing to afford him equal opportunities of broadcasting his campaign television spots after entering into a contract with his incumbent opponent, Tom Ed McHugh, and extensively airing the incumbent's unedited campaign spots. The owner of the station explicitly justifies the refusal on grounds of content-based censorship. 47 U.S.C. Section 315(a) states:

"Provided, that such licensee shall have no power of censorship over the material broadcast under the provisions of this Section." Emphasis original.

Mr. Manship's subsequent approval of two of the six ads underscores content-based censorship as the clear rationale of the station's

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Mr. Milton Gross
September 29, 1992

refusal. Mr. Manship's veiled suggestion in The Advocate article that anti-abortion political material is "obscene" was dispensed with by the FCC in its August, 1992 ruling to the contrary. It is inconceivable that Mr. Manship was and is unaware of the ruling.

Relief Requested

This Administrative Complaint is forwarded to your office by telefax with Exhibits, save a VHS copy of the six campaign spots in question which have been labeled Exhibit "E" and are being sent by Federal Express with the original of this Complaint to your office today. The Reverend Carmouche asks for an immediate investigation and disposition of this matter by the Commission in light of the urgency of the timing involved. Unless this Complaint is acted upon immediately, administrative remedies will not be able to be exhausted prior to the actual date of the election. Reverend Carmouche considers WBRZ-TV's position to be a blatant violation of statute and Commission rules and regulations promulgated pursuant to 47 U.S.C. Section 315(d), and Reverend Carmouche suspects political advocacy on the part of the station to be the primary motive involved.

Respectfully Submitted:



C. John Caskey

CJC:lmw

copy w/enclosures: WBRZ-TV

VERIFICATION

STATE OF LOUISIANA

PARISH OF EAST BATON ROUGE

BEFORE ME, the undersigned authority, personally came and appeared THE REVEREND KIM CARMOUCHE, who being duly sworn by me did depose and say:

THAT he has read the foregoing Administrative Complaint lodged with the Federal Communications Commission against WBRZ-TV, and that every allegation contained therein is true and correct to the best of his own knowledge, information and belief.

Reverend Kim Carmouche
REVEREND KIM CARMOUCHE

SWORN TO AND SUBSCRIBED before me this 29th day of September, 1992 in Baton Rouge, Louisiana.

[Signature]
NOTARY PUBLIC

OPERATION RESCUE LOUISIANA

Date: August 20, 1992

Contact: Anne Marie Booth
(504) 346- 8423

BATON ROUGE: Right to Life advocate, the Reverend Kim Carmouche, announced today that he is qualifying for the October 3 election for Mayor-President. Carmouche said "This city and parish deserve a clear choice in candidates on family matters and the right to life. I concede that I'm not a politician or an experienced fence-straddler who will appeal to all groups, but I have already demonstrated the most crucial leadership of all - not only in the pulpit but also in the neighborhoods of Baton Rouge. Without a strong advocate for family values and the right of the unborn to live, this city has no alternative to "business as usual". This year alone over 1000 of Baton Rouge's future citizens have been slaughtered by abortionists. Unless the sanctity of life is restored, there is no safety for the elderly, the infirm or the forgotten of our city. A number of years ago, a mayoral candidate in St. Louis pledged to work to make that city an abortion-free zone. I'm asking the city of Baton Rouge to say "YES" to life. Let's make our city an abortion-free zone. As your mayor, I'll be a leader, not a follower of politically 'correct' idealogy."

FOR IMMEDIATE RELEASE



SEP 29 '92 03:35PM SAVE JIES
 LOUISIANA TELEVISION BROADCASTING CORPORATION
 P.O. BOX 2006
 BATON ROUGE, LA 70821
 PHONE 504-387-2222
 SALES 504-336-2226

P. 6/23

START DATE 09/22/92	CONTRACT # 2899	MOD #	PAG
END DATE 10/02/92	DATE ENTERED 09/18/92	DATE LAST MOD 09/21/92	

CONTRACT

WEINER COMPANIES
ATTN: ROBERT REVEL
2431 S. ACADIAN THRUW
SUITE 460
BR, LA 70808
(504) 928-6931

ADVERTISER TOM ED MCHUGH	STATION/MARKET WBRZ-TV-BATON ROUGE, LA		
PRODUCT MAYORIAL RACE/DEMO	SALES/PERSON/OFFICE CARTER/POLITICAL		
CONTRACT YEAR	BILLING CYCLE CAL MONTH	BILLING METHOD AS AIRED	RATE CARD
AD: 53000 AG: 75228 SL: 7 CC:250/ 0/ 0 A:			

COPY BEHINDS STRICTLY CONFIDENTIAL

LINE #	TIMES/PROGRAMS	DATES	ID #	LENGTH	MO	TU	WE	TH	FR	SA	SU	RATE
1	5:58A - 7A	TU 09/22/92-WE 09/23/92		30	0	1	1	0	0	0	0	2 125.0
2	5:58A - 7A	MO 09/28/92-FR 10/02/92		30	1	1	1	1	1	0	0	5 125.0
3	6:58A - 9A	TU 09/22/92-WE 09/23/92		30	0	1	1	0	0	0	0	2 100.0
4	6:58A - 9A	MO 09/28/92-FR 10/02/92		30	1	1	1	1	1	0	0	5 100.0
5	10:58A -12N ***SPECIAL***	TU 09/22/92-WE 09/23/92		30	0	1	1	0	0	0	0	2 125.0
6	10:58A -12N ***SPECIAL***	MO 09/28/92-FR 10/02/92		30	1	1	1	1	1	0	0	5 125.0
7	3:58P - 5P	TU 09/22/92-WE 09/23/92		30	0	1	1	0	0	0	0	2 200.0
8	3:58P - 5P	MO 09/28/92-FR 10/02/92		30	1	1	1	1	1	0	0	5 200.0
9	4:58P - 5:30P	TU 09/22/92-WE 09/23/92		30	0	1	1	0	0	0	0	2 250.0
10	4:58P - 5:30P	MO 09/28/92-FR 10/02/92		30	X	X	X	X	X	-	-	2 250.0
11	5:58P - 6:30P	TU 09/22/92-TU 09/22/92		30	0	1	0	0	0	0	0	1 425.0
12	5:58P - 6:30P	MO 09/28/92-FR 10/02/92		30	X	X	X	X	X	-	-	1 425.0
13	7:58P -11P	MO 09/28/92-MO 09/28/92		30	1	0	0	0	0	0	0	1 900.0
14	9:58P -10:35P	WE 09/23/92-WE 09/23/92		30	0	0	1	0	0	0	0	1 425.0
15	9:58P -10:35P	TU 09/29/92-FR 10/02/92		30	-	X	X	X	X	-	-	1 425.0
16	8:58A -10A	FR 10/02/92-FR 10/02/92		30	0	0	0	0	1	0	0	1 60.0
17	11:58A -12:30P	TU 09/22/92-WE 09/23/92		30	0	1	1	0	0	0	0	2 70.0
18	11:58A -12:30P	MO 09/28/92-FR 10/02/92		30	1	1	1	1	1	0	0	5 70.0

-----ADDITIONAL-INSTRUCTIONS-----
 POLITICAL
 2 WEEKS CANCELLATION NOTICE REQUIRED

SEP 92 OCT 92
 6117.50 1882.50

ACCEPTED FOR STATION

ACCEPTED FOR AGENCY AND MEDIA BUYING SERVICE BY THE AGENT FOR THE ADVERTISER

EXHIBIT

B



SEP 29 '92 03:36PM SAVE AIES
 LOUISIANA TELEVISION BROADCASTING CORPORATION
 P.O. BOX 2806
 BATON ROUGE, LA 70821
 PHONE 504-387-2222
 SALES 504-336-2226

CONTRACT

START DATE 09/22/92	CONTRACT # 7/23 2899	MOD #	PAGE
END DATE 10/02/92	DATE ENTERED 09/18/92	DATE LAST MODIF 09/21/9	

WEINER COMPANIES
ATTN: ROBERT REVEL
2431 S. ACADIAN THRUWY
SUITE 460
BR, LA 70808
(504) 928-6931

ADVERTISER TOM ED MCHUGH	STATION/MARKET WBRZ-TV-BATON ROUGE, LA		
PRODUCT MAYORIAL RACE/DEMO	SALESPERSON/OFFICE CARTER/POLITICAL		
CONTRACT YEAR	BILLING CYCLE CAL MONTH	BILLING METHOD AS AIRED	RATE CARD
AD: 53000 AG: 75228 SL: 7 CC:250/ 0/ 0 A:			

LINE#	TIMES/PROGRAMS	DATES	ID #	LENGTH	MO	TU	WE	TH	FR	SA	SU	RATE
<p style="text-align: center;">-----AIR-----TOTALS-----</p> <p>WEEKS---SPOTS---GROSS---AGENCY COMMISSION---NET</p> <p>2 45 8000.00 1200.00 6800.00</p>												

COPY OF AIRLINES STRICTLY ENFORCED 48

WBRZ-TV-BATON ROUGE

ACCEPTED FOR STATION

ACCEPTED FOR AGENCY (AND MEDIA BUYING SERVICE) AND AS AGENT FOR THE ADVERTISER

CONTRACT # 10
CASH TRADE NON-CM
TOTAL COST \$8,000

REVENUE AREAS 1. National 2. Local 3. Regional
4. Direct Response 5. Nat./Direct Resp. 6. Package
7. Political 8. Prod. 9. Misc. 10. Market Development



DATE 9/17
START DATE 9/22
END DATE 10/2

ADVERTISER # NEW 5300 ADVERTISER NAME TOM ED MC Hugh
AGENCY # 75228 AGENCY NAME _____ CITY _____
SALESPERSON # 7 SALESPERSON CC OFFICE _____
PRODUCT NAME MAYORIAL RACE-EBR PPC 184 SPC APC
BUYER NAME Robert Revel PHONE # (1) 928-6931
SPECIAL INSTRUCTIONS _____

DIRECT _____
BILLING STD _____ CAL
WEEKLY _____ SPECIAL _____
MANY PRODUCTS _____ SEP INV _____
REMARK # 8
PRIORITY _____

#	START AND END DATE	AVAIL	P	LEN	COST	START AND END TIME	#/WK	MO	TU	WE	TH	FR	SA	SU	FLIGHTS
1	9/22-23			30	125	558A-7A	2		+	+					
2	9/28-10/2			1	125	" "	5	1	1	1	1	1			
3	9/22-23				100	658A-9A	2		+	+					
4	9/28-10/2				100	" "	5	1	1	1	1	1			
5	9/22-23				125	1058A-12N	2		+	+					
6	9/28-10/2				125	" "	5	1	1	1	1	1			
7	9/22-23				200	358p-5p	2		+	+					
8	9/28-10/2				200	" "	5	1	2	1	1	1			
9	9/22-23				250	458p-530p	2		+	+					
10	9/28-10/2				250	" "	2								
11	9/22-23				425	558p-630p	1		+						

SEP 29 '92 03:37PM SAVE BIES

Approved _____ Date _____

Entered By ⊖ Date 9/18

PAGE#

OF

ADV#

ACY#

DATE

CONTRACT #

#	START AND END DATE	AVAIL	P	LEN	COST	START AND END TIME	#/WK	MO	TU	WE	TH	FR	SA	SU	FLIGHTS
11	9/28-10/2			30	425	558p-630p	1								
12	9/28				900	8p-11p	1	1							
14	9/23-				425	958p-1035p	1			1					
15	9/28-10/2				425	" "	1								
16	10/2				60	858a-10a	1								
17	9/22-23				70	1158a-1230p	2		1	1					
18	9/28-10/2				70	1158a-1230p	5	1	1	1	1	1			

Date *SEP 29 '92 03:40 PM SAVE* BIES

Sales Person *Carol Carter* P. 10/23

1992 POLITICAL REQUEST FORM

Must be completed for all candidates and issues.

Candidate *Tom Ed McNugh* (or) Issue

Party Affiliation *Democrat* Office *Mayor President -*

Election *Primary* *E BR Parish*

Person Requesting Time

Name *Robert Revel* Agency/Buying Service *Werner + Werner*

Address *2431 S. Acadiano*

Phone Number: (Voice) *928-6931* (Fax) *928-6937*

Avails

Description of Time Requested or Rejected *All attached proposal*

Avails Submitted? Date Submitted *9/15/92* Rate Card # Used *attached*

Political Policy Submitted Date Submitted *9/8/92*

Advised of Clearance Probability *Yes* Dates *9/15*

99% chance of non-clearance using pre-emptive

Order

Airtime \$ Production \$ Traffic Instr.

PB 13 Signed/Date Check In-House

Spot Checked for Use/Disclaimer By Whom/Date

Public File

This Information has been placed in candidate/issue's political file:

Political Request Form Copy of Check Copy of Avails

PB 13 Copy of Rate Card Order Worksheet

Correspondence

WBRZ TV
Tvscan Package Plan -- Week by Week Summary
BATON ROUGE -- JUL/92 ARBITRON

Agency : WEINER AND WEINER	Package No. : 159
Buyer : ROBERT REVEL	Sched Dates : 09/22/92-10/02/92
Advertiser : TOM ED MCHUGH - POLITICAL	Lengths : 30
Product : MAYOR PRESIDENT - EBR	Dayparts : CDE1LPA2
Salesperson : CAROL CARTER	Rate Card : J
Assistant : SHARON BEAM	Telephone : 504-336-2226
	Date Due : 09/15/92

Program/Descr.	Run-Dates	Wks	D	Avg-Rate	SE	SE	TY
Len Days Times	Spts			Total-Cost	22	28	
WBRZ ABC 2							
TUNE IN	SEP22-OCT04	2	C	\$125.00	3	5	TP
30 MO-FR 6:00A- 7:00A		8		\$1,000.00			
GO MORN AMER	SEP22-OCT04	2	C	\$100.00	3	5	TP
30 MO-FR 7:00A- 9:00A		8		\$800.00			
ALL MY CHILD	SEP22-OCT04	2	D	\$125.00	3	5	TP
30 MO-FR 11:00A-12:00P		8		\$1,000.00			
OPRAH WINFREY	SEP22-OCT04	2	E	\$200.00	3	5	TP
30 MO-FR 4:00P- 5:00P		8		\$1,600.00			
EYEWTHS NWS 5	SEP22-OCT04	2	1	\$250.00	2	2	TP
30 MO-FR 5:00P- 5:30P		4		\$1,000.00			
EYEWTHS NWS 6	SEP22-OCT04	2	1	\$425.00	1	1	TP
30 MO-FR 6:00P- 6:30P		2		\$850.00			
NFL M FOOTBALL	SEP28-OCT04	1	P	\$900.00	--	1	TP
30 MON 8:00P-11:00P		1		\$900.00			
EYEWTHS NW T-S	SEP22-OCT04	2	2	\$425.00	1	1	TP
30 TU-SU 10:00P-10:35P		2		\$850.00			
<hr/>							
WBRZ Schedule Totals:		41		\$8,000.00	16	25	
<hr/>							
2 Week Schedule Totals:		41		\$8,000.00	16	25	

REACH AND FREQUENCY PROJECTIONS ARE COMPUTED USING THE BETA-BINOMIAL EXTENSION FORMULA
 PREPARED BY THE TVSCAN RATINGS ANALYSIS SYSTEM. REPORT DESIGN & CONTENTS COPYRIGHT 1992 TVSCAN, INC. (205) 987-7456
 DATA FROM THE JUL 1992 ARBITRON. SUBJECT TO LIMITATIONS AND RESTRICTIONS STATED IN ORIGINAL REPORT.

WBRZ-TV/JOHN BLAIR COMPANY
 BATON ROUGE, LOUISIANA
 THIRD QUARTER 1992 RATE CARD - GRID
 *ALL RATES BELOW UNDERLINED LEVELS ARE PRE-EMPTIBLE
 SUPPLEMENT TO RATE CARD #33
 REVISED SEPTEMBER 11, 1992



** 1992/93 FALL SEASON PRIMETIME PREMIERE WEEK OF SEPTEMBER 21, 1992

			LOWEST UNIT FIXED RATES	INMEDIATELY PRE-EMPTIBLE	LOWEST UNIT INMEDIATELY PRE-EMPTIBLE
M-SAT	7-10PM	SUN 6-10PM	<u>\$400</u>	350	300
		+ PRIME ROS (LIMITED - NO SPECIFIC NIGHTS)			
MON	7-8PM	ABC PRIME VARIOUS	<u>\$450</u>	400	300
MON	7-8PM	** THE YOUNG INDIANA JONES CHRONICLES	<u>\$450</u>	400	300
MON	8-APROX.11PM	NFL MONDAY NIGHT FOOTBALL (9/7-12/28)	<u>\$900</u>	800	600
		(*RATE N/A FOR SAINTS GAME 11/23 OTO. CHECK W/ STATION RE SPORTS/SPECIALS)			
TUE	7-8PM	FULL HOUSE/HOME IMPROVEMENT	<u>\$650</u>	600	475
TUE	7-8PM	FULL HOUSE/RANGIN' WITH MR. COOPER ** (NEW PROGRAM)	<u>\$650</u>	600	500
TUE	8-9PM	ROSEANNE/COACH	<u>\$600</u>	550	450
TUE	9-10PM	+ ABC PRIME VARIOUS	<u>\$500</u>	475	450
TUE	9-10PM	+ GOING TO EXTREMES ** (NEW PROGRAM)	<u>\$500</u>	475	450
WED	7-8PM	WONDER YEARS/DOOGIE HOWER MD (EFF. 8/19)	<u>\$550</u>	500	450
WED	8-9PM	HOMI IMPROVEMENT/ARRESTING BEHAVIOR (EFFECTIVE 8/19 UFM)	<u>\$525</u>	500	450
WED	8-9PM	HOMI IMPROVEMENT/LAURIE HILL ** (NEW PROGRAM)	<u>\$525</u>	500	450
WED	9-10PM	+ CIVIL WARS	<u>\$500</u>	450	400
THU	7-8PM	WHO'S THE BOSS?/GROWING PAINS	<u>\$350</u>	325	275
THU	7-8PM	DELTA/ROOM FOR TWO ** (NEW PROGRAM)	<u>\$350</u>	325	275
THU	8-9PM	HOMEFRONT	<u>\$350</u>	325	275
THU	9-10PM	+ PRIMETIME LIVE	<u>\$500</u>	450	400
FRI	7-8PM	+ FAMILY MATTERS/STEP BY STEP	<u>\$700</u>	650	500
FRI	8-9PM	DINOSAURS/PERFECT STRANGERS	<u>\$550</u>	500	450
FRI	8-9PM	DINOSAURS/CAMP WILDER ** (NEW PROGRAM)	<u>\$550</u>	500	450
FRI	9-10PM	+ 20/20	<u>\$650</u>	625	600
SAT	7-8PM	+ MACGYVER	<u>\$450</u>	400	300
SAT	7-8PM	+ COVINGTON CROSS ** (NEW PROGRAM)	<u>\$450</u>	400	300
SAT	8-9PM	+ HUMAN TARGET	<u>\$350</u>	325	300
SAT	8-9PM	+ CROSSROADS ** (NEW PROGRAM)	<u>\$350</u>	325	300
SAT	9-10PM	+ THE COMMISS	<u>\$400</u>	375	300
SUN	6-7PM	+ LIFE GOES ON	<u>\$375</u>	350	300
SUN	7-8PM	+ AMERICA'S FUNNIEST HOME VIDEOS/ AMERICA'S FUNNIEST PEOPLE	<u>\$650</u>	600	500
SUN	8-10PM	+ ABC SUNDAY NIGHT MOVIE (BY TITLE)	<u>\$550</u>	500	450
M-F	5-530PM	+ EYEWITNESS NEWS	<u>\$250</u>	225	175
SUN	530-6PM	** EYEWITNESS NEWS	<u>\$200</u>	150	90
M-F	6-630PM	+ EYEWITNESS NEWS	<u>\$425</u>	400	350
SAT	6-630PM	** EYEWITNESS NEWS	<u>\$200</u>	175	100
M-SU	10-1035PM	+ EYEWITNESS NEWS	<u>\$425</u>	400	350
SAT	10-1035PM	+ EYEWITNESS NEWS	<u>\$400</u>	350	300
MON	11-1135PM	+ EYEWITNESS NEWS (EFF. 9/7 UFM)	<u>\$200</u>	175	125
T-SU	10-1035PM	+ EYEWITNESS NEWS (EFF. 9/8 UFM)	<u>\$425</u>	400	350
M-F	630-7PM	HARD COPY	<u>\$275</u>	250	200
SAT	630-7PM	NIGHT COURT (LTC 8/29)	<u>\$200</u>	175	100
SAT	630-7PM	WHO'S THE BOSS? (EFF. 9/5)	<u>\$200</u>	175	100
M-F	1035-1105PM	GOLDEN GIRLS	<u>\$225</u>	200	125
T-F	1035-1105PM	MURPHY BROWN (EFF. 9/15 UFM)	<u>\$225</u>	200	125
M-F	1105PM-1205AM	ARSENIO HALL SHOW	<u>\$175</u>	150	100
MON	1135P-1235AM	ARSENIO HALL SHOW (EFF. 9/7 UFM)	<u>\$80</u>	70	60
T-F	1105P-1205AM	ARSENIO HALL SHOW (EFF. 9/8 UFM)	<u>\$175</u>	150	100

ALL RATES BELOW THE UNDERLINED "FIXED" LEVEL ARE IMMEDIATELY PRE-EMPTIBLE.
 LOWEST UNIT PRE-EMPTIBLE RATES ARE SUBJECT TO CHANGE WEEKLY.
 ADVERTISERS WILL BE ADVISED OF CHANGES AND PROBABILITY OF CLEARANCE.

+ INDICATES THE AREAS THAT WILL ACCOMMODATE A :10 ONLY.
 + :10 RATE 50% OF :30.
 10'S IN EYEWITNESS NEWS - ADJACENCIES ONLY.

STATION HAS A LIMITED NUMBER OF :15 COMMERCIAL POSITIONS AVAILABLE.
 ** INDICATES THE AREAS THAT WILL ACCOMMODATE A :10 OR :15 SPOT.

9/28,

Doug W. called - didn't want
three days for wk of 9/18.

Total \$ ~~per~~ ^{per 3rd} day was \$550

bought 7 Noon News @ 70⁼⁼
+ 1 Geraldo in to
replace \$.

TOTAL still \$8,000

SALES ORDER



CONTRACT # _____

CASH TRADE NON-CM _____

TOTAL COST 8000

REVENUE AREAS 1. National 2. Local 3. Regional

4. Direct Response 5. Nat./Direct Resp. 6. Package

7. Political 8. Prod. 9. Misc. 10. Market Development

DATE 9/17
 START DATE 9/22
 END DATE 10/2

P. 19/23

ADVERTISER # _____ ADVERTISER NAME TOM ED Mc Hugh

AGENCY # _____ AGENCY NAME _____ CITY _____

SALESPERSON # 7 SALESPERSON CC OFFICE _____

PRODUCT NAME MAYORIAL Race-EBR PFC _____ SPC 184 APC _____

BUYER NAME Robert Revel PHONE # 1 928-6931

SPECIAL INSTRUCTIONS _____

DIRECT _____

BILLING STD _____ CAL

WEEKLY _____ SPECIAL _____

MANY PRODUCTS _____ SEP INV _____

REMARK # B

PRIORITY _____

#	START AND END DATE	AVAIL	P	LEN	COST	START AND END TIME	#/WK	MO	TU	WE	TH	FR	SA	SU	FLIGHTS
1	9/22-25			30	125	558A-7A	3								
2	9/28-10/2			1	125	" "	5	1	1	1	1	1			
3	9/22-25				100	658A-9A	3								
4	9/28-10/2				100	" "	5	1	1	1	1	1			
5	9/22-25				125	1058A-12N	3								
6	9/28-10/2				125	" "	5	1	1	1	1	1			
7	9/22-25				200	358p-5p	3								
8	9/28-10/2				200	" "	5	1	1	1	1	1			
9	9/22-25				250	458p-530p	2								
10	9/28-10/2				250	" "	2								
11	9/22-25				425	558p-630p	1								

SEP 29 10 03 AM '92

Approved _____ Date _____

Entered By _____ Date _____

2 WBRZ Telecommu

*Jeff -
Please handle
& return to*

DATE:

9/15/9

TO:

9A-1230P

*me
JK -
CC*

ATTN:

Bill

FROM:

Carol

MESSAGE:

*Bill, here's the revised
John Ed McHugh proposal*

Thanks!

Carol

Number of Pages to Follow:

1

275

If you have any questions regarding this transmittal, please call the sender, or WBRZ at 387-2222.

Fax Numbers :

(504) 336-2229

Sales Department

(504) 336-2347

News Department

(504) 336-2246

All Other Departments

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