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March 20, 1992

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REC'D MASS MED BUREAU File No.
0937-109-66

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MAR 20 1992

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

VIDEO SERVICES

Reference: Beach TV Properties, Inc.
(NEW) Channel 46
Panama City Beach, FL
File No. BPCT-910815KE
Federal Communications Commission
Office of the Secretary

Dear Ms. Searcy:

We submit in triplicate a Petition for Leave to Amend
the above-referenced application.

If there are any questions in regard to this matter,
kindly communicate directly with this office.

Respectfully submitted,

BEACH TV PROPERTIES, INC.

By: 
Henry A. Solomon
Its Attorney

HAS:dh
Enclosure

cc: Local Public File
Robert S. Stone, Esq. (w/encl.)

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAR 20 1992

Federal Communications Commission
Office of the Secretary

In re Application of)
)
BEACH TV PROPERTIES, INC.) File No. BPCT-910815KE
)
For a Construction Permit)
for a new TV Station on)
Channel 46, Panama City Beach,)
Florida)

To: Mass Media Bureau

PETITION FOR LEAVE TO AMEND APPLICATION

Beach TV Properties, Inc. ("Beach"), by its attorneys, and pursuant to 47 C.F.R. §73.3522(a)(2), petitions for leave to amend its above-referenced application. In support hereof, the following is shown:

1. The attached Amendment proposes relocation of Beach's antenna site to an existing television tower. The FAA notified Beach that construction of Beach's tower would presumably be a hazard to air navigation. The FAA gave Beach the options of requesting a further study within thirty days (by March 25, 1992), or of significantly reducing structure height. Beach believes that relocation to a tower which has already been cleared by the FAA is the most appropriate course of action. Such site change would obviate any administrative delays and would not prejudice any mutually exclusive applicant.

2. Good cause exists for acceptance of the proffered Amendment. As indicated above, Beach does not seek, nor will it obtain, any comparative advantage if the Amendment is accepted. Beach recognizes that its coverage data are limited to those reported in its application, as previously amended. Acceptance of this Amendment will not disrupt the orderly conduct of this proceeding; nor would it necessitate additional hearings. Beach has acted with due diligence in tendering this Amendment within 30 days of the FAA's advisory, and the amendment process has not been occasioned by the voluntary act of the applicant. See Erwin O'Conner Broadcasting Co., 22 FCC 2d 140, 142 (Rev. Bd. 1970).

WHEREFORE, THE PREMISES CONSIDERED, It is respectfully requested that the proffered minor Amendment be Accepted.

Respectfully submitted,
BEACH TV PROPERTIES, INC.

By: 
Henry A. Solomon
Melodie A. Virtue
Its Attorneys

HALEY, BADER & POTTS
2000 M Street, N.W., Suite 600
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March 20, 1992

CERTIFICATE OF SERVICE

I, Dinah L. Hood, a secretary at Haley, Bader & Potts, hereby certify that a copy of the foregoing "PETITION FOR LEAVE TO AMEND APPLICATION" was mailed, postage prepaid, this 20th day of March, 1992, to the following:

Robert S. Stone, Esq.
McCannbell & Young
P.O. Box 550
Knoxville, TX 37901-0550



Dinah L. Hood