

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

In re matter of )  
 )  
Amendment of Section 76.51(a) )  
Major Television Markets )  
(Tampa-St. Petersburg-Clearwater-, )  
Lakeland, Florida) )

RM- \_\_\_\_\_

To: Chief, Mass Media Bureau

Attention: Mail Stop 1800E

RECEIVED

DEC 16 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

PETITION FOR RULEMAKING

Public Interest Corporation, licensee of television Station WTMV(TV), Lakeland, Florida ("WTMV"), by its attorneys, hereby requests that the Commission initiate a rulemaking proceeding to amend Section 76.51(a) of the Commission's Rules to redesignate the Tampa-St. Petersburg-Clearwater, Florida hyphenated market as Tampa-St. Petersburg-Clearwater-Lakeland, Florida.<sup>1/</sup> In support thereof, the following is stated:

INTRODUCTION

1. Because Lakeland is located inside the Tampa-St. Petersburg Arbitron Area of Dominant Influence ("ADI"),<sup>2/</sup> WTMV competes directly with the television stations in the Tampa-St. Petersburg-Clearwater hyphenated market for audience share and advertising dollars. As an independent UHF station, WTMV's viability depends upon whether it is able to secure carriage on

1/ As noted infra, on December 15, 1992, the FCC issued a Report and Order adding Clearwater to the Tampa-St. Petersburg market. See Notice of Proposed Rule Making, MM Docket No. 93-218, FCC 93-1477 (MM Bur. rel. December 15, 1993).

2/ See 1993 Broadcasting & Cable Yearbook at C-201.

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cable systems throughout the Tampa-St. Petersburg ADI, in accordance with its must-carry rights under the 1992 Cable Act and the FCC's Rules. Cable systems inside the Tampa-St. Petersburg ADI, however, are not required to carry WTMV if doing so would cause them to incur additional copyright liability. See 47 C.F.R. § 76.55(c)(2).

2. Because Lakeland is not a designated community in the Tampa-St. Petersburg-Clearwater hyphenated market, WTMV is a "distant signal" (and thus may not be carried without incurring additional copyright fees) on Tampa-St. Petersburg ADI cable systems which are (a) more than 35 miles from Lakeland and (b) located in counties where WTMV is not significantly viewed. Consequently, although Lakeland is part of the same ADI as Tampa and St. Petersburg and thus may demand carriage on cable systems in and around those communities, the station will not be carried by those systems unless WTMV agrees to indemnify the affected cable operators for their increased copyright liability, i.e., their additional distant signal fees attributable to carriage of WTMV. Based on correspondence from the cable operators in question, WMTV estimates that these additional copyright fees would run into the millions of dollars. See Exhibit 1 (letters from cable systems noting the additional copyright liability). Even if WTMV could afford to pay these fees, it could not do so and remain competitive with the Tampa-St. Petersburg-Clearwater stations, since they are licensed to designated communities in the hyphenated market and thus do not have to reimburse cable

operators for any copyright fees. WTMV thus submits that the above-described competitive imbalance, and the other circumstances of this case, warrant the addition of Lakeland to the Tampa-St. Petersburg-Clearwater hyphenated market. WTMV further submits that the facts of this case are very similar to those supporting the FCC's recent addition of Clearwater to the Tampa-St. Petersburg hyphenated market (see note 1, supra), and that the FCC's action with respect to Clearwater thus provides an additional basis for granting WTMV's Petition.

#### ARGUMENT

3. In evaluating requests for hyphenation of a television market, the Commission considers the following factors:

- a. the distance between the existing designated communities and the community proposed to be added to the designation;
- b. whether cable carriage, if afforded to the subject station, would extend to areas beyond its Grade B signal coverage area;
- c. the presence of a clear showing of a particularized need by the station requesting the change of market designation; and
- d. an indication of benefit to the public from the proposed change.

See e.g., Amendment of Section 76.51, Major Television Markets (Orlando-Daytona Beach, Melbourne and Cocoa, Florida), 57 RR 2d 685 (1985). Using these factors as a guide, the FCC evaluates whether adding a community to an existing market will further the objective of the market hyphenation rule, which is to delineate areas where stations "can and do, both actually and logically, compete." Id. The application of these factors to WTMV's

situation reflects that WTMV does in fact compete with the television stations in the Tampa-St. Petersburg-Clearwater hyphenated market. The market should therefore be re-hyphenated to include Lakeland.

**Distance Between The Subject Communities.**

4. Lakeland is only 50 km. (31 miles) from Tampa, the principal city in the market. Furthermore, Lakeland is only 75 km. (47 miles) from St. Petersburg, the second designated city in the market, and approximately 50 miles from Clearwater, the third designated city in the market. These distances compare favorably to those in other cases where the Commission has either added or proposed to add a community to a hyphenated market. See e.g. Riverside/Los Angeles MM Docket No. 93-207, DA. 93-1444 (MM. Bur. rel Dec. 7, 1993) (94 km/58 mi.); Rome/Atlanta, GA, 7 FCC Rcd 8591 (1992) (91 km./56 mi.); Clermont/Orlando-Daytona Beach-Melbourne-Cocoa, FL, 8 FCC Rcd 3667 (1993) (37 km./23 mi.); Concord/San Francisco-Oakland-San Jose, CA, MM Docket No. 93-232, DA 93-991 (MM. Bur. rel. Aug. 19, 1993) (41 km./25 mi.); Pine Bluff-Little Rock, AR, MM Docket No. 93-233, DA 93-992, (MM. Bur. rel. Aug. 19, 1993) (63 km./39 mi.); and Clearwater/Tampa-St. Petersburg, supra (34 km./21 mi. to Tampa, 24 km./15 mi. to St. Petersburg). Because of this geographic proximity, Lakeland, Tampa, St. Petersburg and Clearwater have shared economic, social and cultural interests which link them together as a single television market.

**Cable Carriage Beyond Grade B Contour.**

5. The second factor the Commission considers is whether a grant of the proposed hyphenation will result in cable carriage of the subject station beyond its Grade B signal coverage area. As indicated by the WTMV contour map attached hereto as Exhibit 2, WTMV's city grade contour encompasses part of and its Grade A contour encompasses substantially all of Tampa, and its Grade B contour encompasses all of St. Petersburg. If Lakeland is added to the Tampa-St. Petersburg-Clearwater hyphenated market, WTMV will be entitled to copyright-free cable carriage inside each of the entire Lakeland, Tampa, St. Petersburg and Clearwater 35-mile zones. Hence, since WTMV's Grade B contour already encompasses Tampa and St. Petersburg, the addition of Lakeland to the Tampa-St. Petersburg-Clearwater hyphenated market will not expand WTMV's cable carriage rights significantly beyond its Grade B contour.<sup>3/</sup>

**Showing of Particularized Need.**

6. As noted above, WTMV is in the anomalous position of having to compete directly with the Tampa-St. Petersburg ADI stations without having comparable cable carriage rights throughout the market. The attached excerpt from the 1993 Cable and Station Atlas reflects that there is a substantial amount of contour overlap between WTMV and the Tampa-St. Petersburg ADI

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<sup>3/</sup> WTMV also submits that this factor has less relevance under the current must-carry framework, in which Congress accorded commercial television stations mandatory carriage rights on a marketwide rather than on a signal-coverage basis.

stations, meaning that they compete directly for audience share and advertising dollars. See Exhibit 3. Furthermore, WMTV is widely recognized as a Tampa market station. For example, WMTV is included in the television program listings published by Tampa newspapers and magazines and by the Tampa-Sarasota edition of TV Guide. See Exhibit 4. The station has also received a number of awards and commendations from Tampa-based publications and organizations for its programming and commitment to local service. See Exhibit 5 (excerpt from Tampa Bay magazine identifying WMTV as "Best TV Station") and Exhibit 6 (awards and commendations from Tampa area organizations.)<sup>4/</sup>

7. The close relationship between WMTV and the Tampa area is further evidenced by the fact that program suppliers (network or otherwise) recognize WMTV as a Tampa market station. See Exhibit 8. In fact, WMTV is the station which carries many ABC, NBC and CBS programs when the Tampa network affiliates preempt their network programming. Id. Furthermore, even though WMTV is not carried on a number of Tampa market systems, program syndicators charge WMTV Tampa rates for programming in recognition of the fact that WMTV is an integral part of the Tampa ADI, is listed in all regional and local program guides, and competes with Tampa stations for viewers.<sup>5/</sup> See Exhibit 9,

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<sup>4/</sup> WMTV is also the Tampa television affiliate for the Florida Marlins major league baseball club. See Exhibit 7.

<sup>5/</sup> Because Lakeland is only 31 miles from Tampa, program suppliers may sell Tampa stations exclusive programming rights as against WMTV. See 47 C.F.R. § 73.658(m). WMTV thus cannot often  
(continued...)

Declaration of Dan L. Johnson. Indeed, most of the station's advertisers are businesses located in Tampa, and regional and national advertisers buy spot time on WTMV precisely because it is a major independent station in the Tampa market. Id.

8. Nonetheless, without cable carriage in and around the population centers of Tampa, St. Petersburg and Clearwater, WTMV cannot compete effectively for audience and advertising dollars with stations which already enjoy marketwide cable coverage. Unless WTMV is placed on a more level playing field with the other Tampa market stations, WTMV will be less able to invest in the types of local programming Congress intended to foster in adopting the must-carry provisions of the 1992 Cable Act. The only way to resolve this problem is to add Lakeland to the Tampa-St. Petersburg-Clearwater hyphenated market, thereby removing the principal barrier to cable carriage of WTMV throughout the Tampa-St. Petersburg ADI.

**Grant of WTMV's Petition Will Serve the Public Interest.**

9. Congress's overriding objectives in adopting the must-carry provisions of the 1992 Cable Act were to provide cable subscribers with a diverse menu of local programming, and to assist smaller stations which had not previously enjoyed the same marketwide cable carriage as their competitors. See Cable Television Consumer Protection and Competition Act of 1992, P.L.

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5/(...continued)  
obtain popular syndicated fare unless it agrees to pay Tampa market rates for programming.

No. 102-385, 106 Stat. 1960, § 2(a)(9)-(16) (1992). The FCC will achieve both of these objectives by adding Lakeland to the Tampa-St. Petersburg-Clearwater hyphenated market, thus permitting WTMV to obtain cable carriage on the Tampa-St. Petersburg ADI cable systems which presently carry other Tampa market stations. Expanded cable carriage of WTMV will add another diverse broadcast voice to the menu of programming currently available to cable subscribers in the ADI and enhance the station's ability to attract the local, regional and national advertising dollars it needs to survive. WTMV thus submits that a grant of its Petition would serve the public interest and should be granted forthwith.

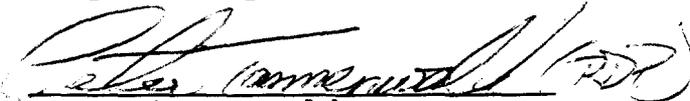
#### CONCLUSION

10. The addition of Lakeland to the Tampa-St. Petersburg-Clearwater hyphenated market satisfies the four criteria for market hyphenation. Specifically, WTMV has demonstrated that (1) Lakeland is sufficiently proximate to Tampa, St. Petersburg and Clearwater to be considered part of the Tampa-St. Petersburg-Clearwater hyphenated market; (2) the addition of Lakeland will not to any significant extent expand WTMV's cable carriage beyond the station's Grade B contour; (3) WTMV's particularized need for hyphenation arises from its inability to obtain the same marketwide cable carriage as its competitors; and (4) hyphenation would serve Congressional objectives and the public interest. Accordingly, WTMV requests that the FCC promptly issue a Notice of Proposed Rulemaking proposing the addition of Lakeland to the

Tampa-St. Petersburg-Clearwater hyphenated market, with a recommendation that the proposed hyphenation be adopted.

Wherefore, Public Interest Corporation requests that the FCC grant this Petition as requested above.

Respectfully submitted,

  
Peter Tannenwald

  
Robert D. Primosch

Arent Fox Kintner Plotkin & Kahn  
1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
(202)857-6024/857-6353

Counsel for Public Interest  
Corporation

December 16, 1993

ALL-STATE LEGAL SUPPLY CO. 1-800-222-0510 ED11-1C RECYCLED



CABLEVISION<sup>sm</sup>  
**CVI**  
INDUSTRIES

1655 STATE RD 472 P.O. BOX 8001 DELAND FL 32723-6001 (804) 775-4444 FAX: (904) 775-9303  
REGIONAL OFFICE

May 7, 1993

VIA CERTIFIED MAIL

WTMV  
Mr. Dan Johnson, General Manager  
7201 E. Hillsborough Ave.  
Tampa, Florida 33601

Dear Mr. Johnson:

This letter is provided to you pursuant to Section 76.58(d) of the Federal Communication Commission's Rules which requires a system to inform a commercial station or noncommercial educational station why it may not be entitled to carriage. We hereby notify you that WTMV is not entitled to carriage because it may cause an estimated \$6,600 annually of increased copyright liability to the cable system located in Palmetto, serving the community of Palmetto.

Should you have any questions, or need additional clarification, please contact me.

Sincerely,



Rich Gunter, Director of  
Government Relations  
Florida Region

RTG/  
ltcrplm

We're taking television  
into tomorrow.



May 28, 1993

Mr. Dan L. Johnson  
General Manager  
WTMV  
7201 E. Hillsborough Avenue  
Tampa, Florida 33610

VIA CERTIFIED MAIL

Dear Mr. Johnson:

We notified you earlier that increased Copyright liability may impact the must carry rights of WTMV on Port Richey, Florida. In response to your request, we estimate that the increase will be approximately \$1,839,000.00 for the current must carry election period (1993-1996).

Please keep in mind that our business is not static and many factors affect the Copyright fees we pay such as headend consolidations, acquisitions and, of course, internal growth. Therefore, Copyright costs may increase over time for a variety of reasons, including changes to our service offerings and/or prices. If you agree to indemnify TCI Cablevision of Pasco County for any Copyright increase associated with carriage of your signal, sign an indemnification agreement in the form attached, and provide a performance bond, letter of credit, or other financial instrument, WTMV could then be added to the Port Richey, Florida cable system.

I'm available to discuss the particulars of this with you at your convenience.

Very truly yours,

TCI CABLEVISION OF PASCO COUNTY

A handwritten signature in cursive script that reads "Vickie D. Chansler".

Vickie D. Chansler  
Area Manager

Attachment

10555 Moon Lake Road  
New Port Richey, Florida 34654-2899  
(813) 856-3278  
FAX (813) 856-6789

An Equal Opportunity Employer



50 Locust Avenue  
New Canaan, CT 06840-4750  
203-972-2000  
Telecopier: 203-966-9228

June 14, 1993

Mr. Dan L. Johnson  
WTMV  
P.O. Box 32  
Tampa, FL 33601

Dear Mr. Johnson:

Re: **MUST CARRY/COPYRIGHT LIABILITY**

We have received your letter requesting information regarding copyright liability relating to carriage on our system serving Dunnellon, FL. Since you are a distant signal for copyright purposes, in the event you are carried on our system pursuant to "must carry" rights, you will be responsible for reimbursing and indemnifying us for certain copyright fees. We estimate your copyright liability for the six-month period ending December 31, 1993 to be approximately \$13,000.00. This is an estimate only, and the actual amount of copyright liability for which you will be responsible with respect to the above six-month period, as well as other periods, may vary significantly from the above amount based on numerous factors, including without limitation revenues of the system, number and type of signals carried, and channel packaging.

Prior to carrying you pursuant to any "must carry" rights you may have, we will require you to execute a Copyright Indemnification Agreement. If you intend to pursue "must carry," please contact the undersigned in writing and we will forward to you the above Agreement.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. W. Paul', written over the typed name.

Douglas W. Paul  
Vice President

et-ll brand fax-transmittal memo 7671

# of pages 2

TO Johnson	FROM Jim Rozier
WTMV	Co. CW
nt.	Phone # 660-5524
813-622-7732	Fax # 660-5551



Rehabilitation of Central Florida

A DIVISION of Time Warner Cable  
A TIME WARNER ENTERTAINMENT COMPANY

**WTMV POTENTIAL COPYRIGHT LIABILITY**

Brooksville System - WTMV would be an unpermitted distant signal and be subject to the fee of 3.75 % of gross receipts.

Gross Receipts For 7/92 - 12/92	\$ 434,802.00
	x .0375
<b>Subtotal</b>	<b>\$ 16,305.08</b>
<b>DSE Rate</b>	<b>x 1.00</b>
<b>Six Month Copyright Liability</b>	<b>\$ 16,305.08</b>
	<b>x 2</b>
<b>Annual Copyright Liability</b>	<b>\$ 32,610.16</b>

West Hernando County - WTMV would be an unpermitted distant signal and be subject to the fee of 3.75 % of gross receipts.

Gross Receipts For 7/92 - 12/92	\$ 1,914,060.00
	x .0375
<b>Subtotal</b>	<b>\$ 71,777.25</b>
<b>DSE Rate</b>	<b>x 1.00</b>
<b>Six Month Copyright Liability</b>	<b>\$ 71,777.25</b>
	<b>x 2</b>
<b>Annual Copyright Liability</b>	<b>\$ 143,554.50</b>

Citrus County System - WTMV would be an unpermitted distant signal and be subject to the fee of 3.75 % of gross receipts.

Gross Receipts For 7/92 - 12/92	\$ 1,801,100.00
	x .0375
Subtotal	\$ 67,541.25
DSE Rate	x 1.00
Six Month Copyright Liability	\$ 67,541.25
	x 2
Annual Copyright Liability	\$ 135,082.50

Isla Del Sol System - If the Low Power TV station, W63BS, is not used, then WTMV would be an unpermitted distant signal to this system.

Gross Receipts For 7/92 - 12/92	\$ 292,000.00
	x .0375
Subtotal	\$ 10,950.00
DSE Rate	x 1.00
Six Month Copyright Liability	\$ 10,950.00
	x 2
Annual Copyright Liability	\$ 21,900.00

# STORER CABLE

COMMUNICATIONS  
OF WEST FLORIDA, INC.

5205 Fruitville Road  
P.O. Box 1178  
Sarasota, FL 34230  
(813) 371-4444  
FAX (813) 371-5097

June 4, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Dan L. Johnson, General Manager  
WTMV 32  
101 West Main Street, Suite 32  
Lakeland, Florida 33801

Dear Dan L. Johnson

This is in response to your letter dated May 7, 1993 regarding carriage of WTMV 32 from Lakeland, Florida on Storer Cable Communications of West Florida, Inc. in Sarasota.

As of the most recent filing with the copyright office the following are responses to your questions.

- A & B. 53,906 residential customers at \$7.95 per month  
37,122 commercial customers at rates between \$7.95 and \$17.95.
- C. 2 DSE'S
- D. WGN AND WTBS
- E. Information unavailable.

Since WTMV is licensed to Lakeland, Florida it's Grade B does not cover any part of our cable system and it is a distant non permitted independent signal to our system. In the current situation, carriage of WTMV by Storer Cable Communications of West Florida, Inc. in Sarasota, would result in the system incurring additional copyright fees of approximately \$186,000 per accounting period. There are two accounting periods each year. This charge would be incurred even if the station is carried for only part of an accounting period.

Storer will not commence carriage of WTMV absent receipt of a signed agreement (attached) to reimburse Storer for the additional copyright charges it would incur by virtue of carrying the station, and in light of the large liability which is involved, payment of the charges in advance, or other adequate security.

Finally, you should note that the above estimate of copyright liability is based on the system's revenue as of the end of 1992. The actual copyright liability we would incur as a result of carriage of WTMV would fluctuate as system revenues fluctuate, either up or down.

Very truly yours,



Rod Dagenais  
General Manager

CABLEVISION<sup>sm</sup>  
**CVI**  
INDUSTRIES

CABLEVISION CENTER LIBERTY NY 12754 (814) 292-7550 FAX: (814) 292-2180

\*\*\*VIA FAX (813) 622-7732\*\*\*

September 29, 1993

Dan Johnson  
General Manager  
WTMV  
7201 East Hillsboro Avenue  
PO Box 32  
Tampa, FL 33601

Dear Dan,

I have discussed with our Legal Department the WTMV copyright situation in the Palmetto system. They agree with me that the proper way to file a Copyright Statement of Account in regards to WTMV is to treat it as a partially permitted signal. In areas within the Grade B contour (Manatee County) it will be at the permitted rate and areas outside the Grade B contour (City of Palmetto and Town of Ellenton) it will be at the 3.75% rate. As we discussed the other day, my estimate of the copyright royalty of WTMV on the Palmetto system is approximately \$26,000 annually.

We believe that the approximately \$13,000 which would have to be paid for each copyright filing is a significant amount of money for your station to indemnify us as well as a significant amount of money that we must pay the Copyright Office and then be reimbursed from you. With that in mind we have asked you to place that amount of money in an escrow account. Since you have not agreed to that idea, we are open to any other concepts of security such as a personal guarantee by the owner of the station or the use of bonds or certificates of deposit as collateral. Of course, you will earn any interest on these accounts. If you have any other thoughts, please let me know.



I look forward to hearing from you. Please let me know in writing that you will definitely indemnify CVI for the approximately \$26,000 annually and what method of security you would like to utilize.

Sincerely,

A handwritten signature in black ink, appearing to read "Lew Scharfberg". The signature is fluid and cursive, written over the printed name.

LEW SCHARFBERG  
Corp. Director of Programming

LS:tfk

cc Tom Cruden

CABLEVISION<sup>SM</sup>  
**CVI**  
INDUSTRIES

ONE CABLEVISION CENTER, LIBERTY, NY 12754 (314) 292-7550

\*\*\*CERTIFIED\*\*\*

June 21, 1993

Dan L. Johnson  
General Manager  
WTMV  
7201 East Hillsboro Avenue  
PO Box 32  
Tampa, FL 33601

Dear Mr. Johnson,

I have been forwarded your letter to Rich Gunther regarding copyright fees in the Palmetto cable system. Based on the latest figures available, the applicable copyright revenue for the Palmetto system is approximately \$1,170,000 annually. We currently carry two distant independent stations which equals 2 DSE's. Since your grade B signal does not cover this system and I can find no other reason why WTMV would be a permitted signal, the copyright rate would be 3.75% of the applicable revenue. Therefore, the annual copyright fees would be approximately \$43,875.

Should you desire any additional information about this matter, please contact me.

Sincerely,



LEW SCHARFBERG  
Corp. Director of Programming

LS:tfk:WTMV



**PARAGON**  
C A B L E

April 27, 1993

**BY CERTIFIED MAIL RETURN RECEIPT REQUESTED**

**WTMV**  
Public Interest Corporation  
7201 E. Hillsborough Avenue  
Tampa, Florida 33610

Dear Mr. Johnson:

This letter is being sent to you pursuant to the provisions of section 76.58(D) (2) of the rules of the Federal Communications Commission and constitutes notice that our cable system's carriage of the signal of WTMV will cause an increased copyright liability for Paragon Cable's Manatee County, Florida system.

Under section 111 of the 1976 copyright act (17 U.S.C. section 111) WTMV is considered "distant" to our cable system in that all of the system is located outside the station's "local service area" as defined by the act. Accordingly, our carriage of your station would cause an increase in our copyright liability under the cable compulsory license.

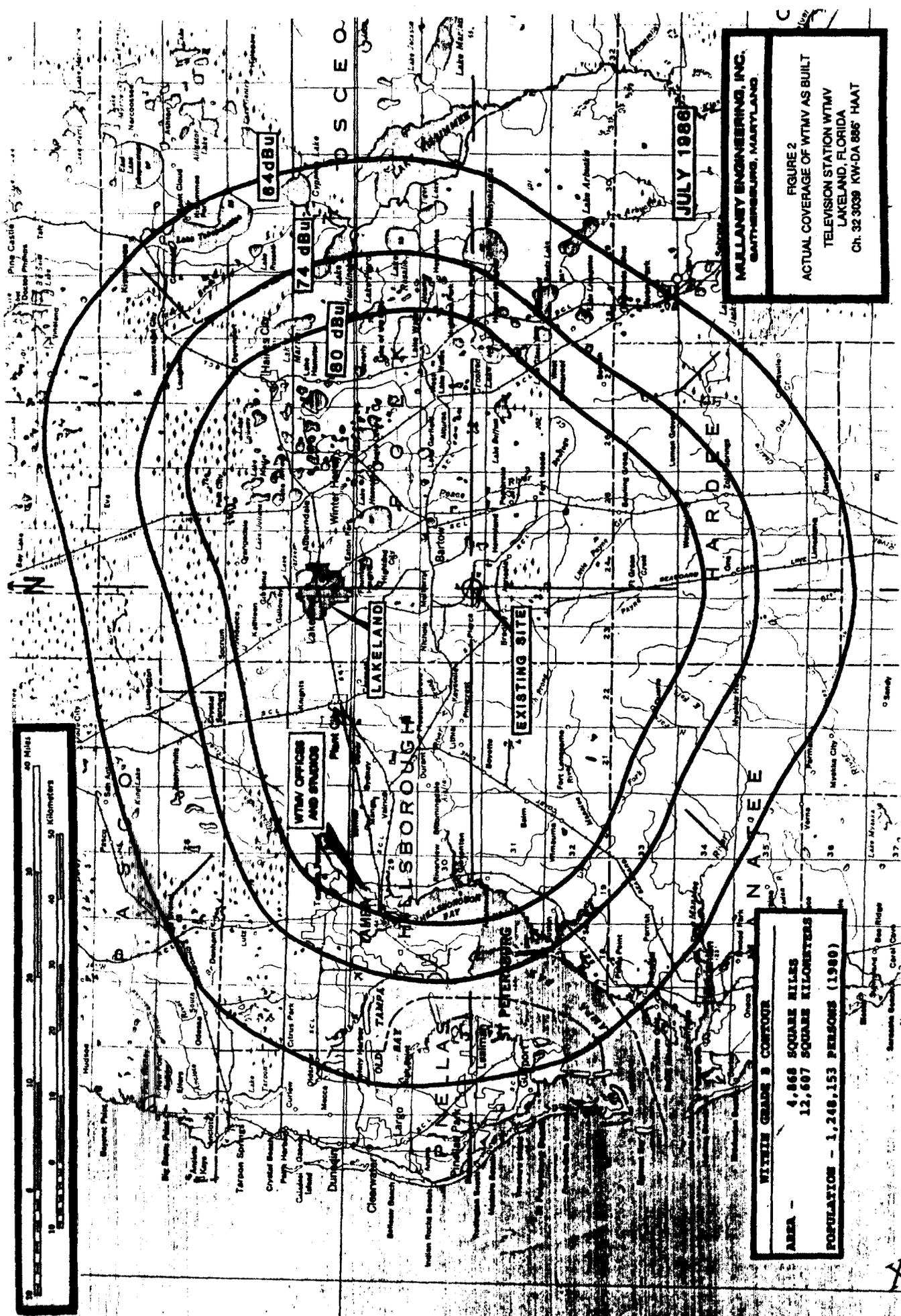
Based on our most-recent statement of account filed with the U.S. Copyright Office for the semi-annual period July 1-December 31, 1992, we estimate that carriage of your station would increase our semi-annual copyright liability by approximately \$83,828, assuming no change in our "gross receipts" as defined by the copyright office. This estimate is based on the fact that WTMV is a non-permitted independent signal to all of our cable system.

Under the Cable Television Consumer Protection and Competition Act of 1992 and the FCC's new Must-Carry Rules, we are not required to carry any local television broadcast station that is considered "distant" for copyright purposes unless that station agrees to indemnify us for our increased copyright costs associated with carriage of the station. Should you desire carriage of WTMV as a Must-Carry station, you must sign and return to us by May 21, 1993 the enclosed copy of this letter signifying your commitment to indemnify us against the additional copyright liability created by such carriage. We would expect to bill you for the amount owed within 30 days after each copyright accounting period ends.

2600 McCormick Drive, Suite 255, Clearwater, Florida 34619 813/791-7730

Owned by American Television & Communications Corp. and Houston Industries Incorporated





**MULLANEY ENGINEERING, INC.**  
 GAITHERSBURG, MARYLAND

**FIGURE 2**  
 ACTUAL COVERAGE OF WTVM AS BUILT  
 TELEVISION STATION WTVM  
 LAKELAND, FLORIDA  
 Ch. 32 3039 KW-DA 896' HAAT

**WITHIN GRADE B CONTOUR**

AREA -  
 4,868 SQUARE MILES  
 12,607 SQUARE KILOMETERS

POPULATION - 1,248,153 PERSONS (1980)

JULY 1986

WTVM OFFICES AND STUDIOS

EXISTING SITE

64 dBu

74 dBu

80 dBu

LAKELAND

WILLSBOROUGH

OLD TAMPA

PETERSBURG

NATALEE

HARDEE

D S C E O

11



