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July 8, 1997

RECEIVED

JUL - 8 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Attention: Policy and Rules Division
Stop Code 1800D

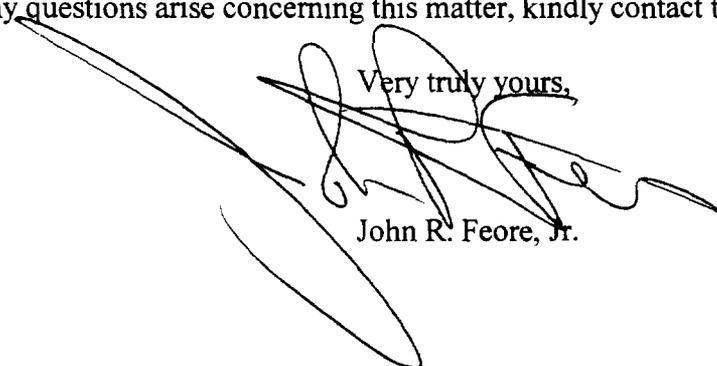
Re: MM Docket Nos. 91-221, 87-8, 94-150, 92-51 and 87-154
Television Station WOAC(TV), Canton, Ohio

Dear Sir or Madam:

On behalf of Whitehead Media of Ohio, Inc., licensee of Television Station WOAC(TV), Canton, Ohio, we submit herewith an original and four copies of the licensee's response to the FCC's June 17, 1997 *Public Notice* in the above-captioned proceedings. This submission concerns a Time Brokerage Agreement between Paxson Communications of Cleveland-67, Inc. and Whitehead Media of Ohio, Inc, the licensee of Television Station WOAC(TV), Canton, Ohio.

Should any questions arise concerning this matter, kindly contact the undersigned.

Very truly yours,


John R. Feore, Jr.

JRF/lkr
Enclosure

No. of copies rec'd 0+4
LINA RUDGE

LMA REPLY FORM

MARKET: CLEVELAND, OHIO

DMA #: 13

					Degree of Overlap (%)			Nielsen (all day) Audience Share (9am - midnight)				
					City Grade	Grade A	Grade B	11/96	2/97	5/97		
Brokered Station	Channel No. & Call Sign Channel 67 WOAC(TV)	Network Affiliation Independent	Licensed Community Canton, OH	Owner/Licensee Whitehead Media of Ohio, Inc.	City Grade A and Grade B overlap (Engineering Supplement to be provided)				Not Available			
Brokering Station:	WAKC	Independent	Akron, OH	Paxson Communications of Cleveland-67, Inc.					Not Available			

LMA Specifics:	Date of LMA Signing	Length of Initial Term	Initial Term Start Date	Initial Term End Date	<u>Renewal Provisions/Terms</u> Describe renewal provisions including: (1) length of renewal, (2) at which party's option, (3) whether renewal is automatic, and (4) how renewal option may be exercised.	% Time Brokered per week
	10/30/95	10 years	10/30/95	10/30/05	Mutually agreed upon term	Up to 96.4% (168 hours/week)

PUBLIC INTEREST BENEFITS RESULTING FROM ENTERING INTO THE LMA

The Time Brokerage Agreement for WOAC(TV), Canton, Ohio, was entered into together with funding provided by Paxson Communications of Cleveland-67, Inc. which enabled Whitehead Media, a company wholly-owned by an African American, to acquire WOAC. The TBA has been combined with the co-location of the stations in new facilities to create cost efficiencies in each station's operation. Without the TBA and the ability to provide programming over the station, Paxson Communications would not have been willing to provide the funding to allow Whitehead Media, Inc. to acquire the station.