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July 8, 1997

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

Re: Station WLYH-TV  
 Lancaster, Pennsylvania  
 MM Docket Nos. 91-221,  
87-8, 94-150, 92-51 and 87-154

RECEIVED

JUL - 8 1997

FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

Dear Mr. Caton:

Gateway Communications, Inc. ("Gateway"), licensee of Station WLYH-TV, Lancaster, Pennsylvania, by its undersigned counsel, hereby provides certain information in response to the Commission's Public Notice entitled "Commission Seeks Further Information Regarding Television LMAs", released June 17, 1997 (DA 97-1246).\*

1. Gateway is a party to a Time Brokerage Agreement (the "LMA") with Clear Channel Television, Inc. ("Clear Channel") pursuant to which Clear Channel provides programming for broadcast by Station WLYH-TV, Channel 15, Lancaster, Pennsylvania (Brokered Station). Clear Channel Television Licenses, Inc. is the licensee of Station WHP-TV, Channel 21, Harrisburg, Pennsylvania (Brokering Station).
2. Stations WLYH-TV and WHP-TV are both located in the Harrisburg-Lancaster-Lebanon-York DMA (No. 45).
3. The city grade signal contours of Stations WLYH-TV and WHP-TV overlap.
4. The LMA is dated October 31, 1995.
5. The initial term of the LMA runs from October 31, 1995 through December 31, 2015. The LMA automatically renews for an additional five (5) years unless either party provides written notice of non-renewal no later than the close of business December 31, 2014.

\* 62 Fed. Reg. 33792 (June 23, 1997).

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6. Clear Channel provides programming for a substantial amount of WLYH-TV's broadcast day on a daily basis throughout the year. Gateway, however, has the obligation to ascertain that the programming of WLYH-TV responds to the needs and concerns of the community of license and has the right to preempt Clear Channel's programming as is necessary to broadcast its own programming which is responsive to issues of concern to the community of license and to children. Furthermore, Gateway may preempt or delete any programming of Clear Channel which it believes is unsuitable or contrary to the public interest and may substitute programming which, in its independent opinion, is of greater local or national importance.

7. Station WLYH-TV is an affiliate of The United Paramount Network ("UPN"); WHP-TV is a CBS affiliate.

8. Nielsen all-day audience shares for WLYH-TV and WHP-TV:

<u>Rating Period</u>	<u>WLYH-TV Share</u>	<u>WHP-TV Share</u>
November, 1996	2	11
February, 1997	2	13
May, 1997	2	11

9. Prior to the LMA between Gateway and Clear Channel, Station WLYH-TV operated for many years as the second CBS affiliate in the Harrisburg-Lancaster-Lebanon-York television market. As a result of the LMA, WLYH-TV currently is the only station in the market affiliated with UPN. Consequently, instead of duplicative CBS programming, television viewers now have available UPN programming broadcast by WLYH-TV, a clear public interest benefit of the LMA.

Should there be any questions concerning this letter, please communicate with the undersigned.

Very truly yours,



John R. Wilner  
Counsel for Gateway Communications, Inc.

JRW/vih