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July 8, 1997

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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

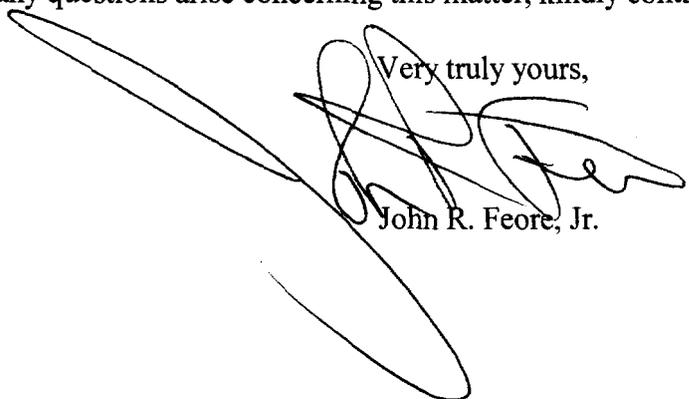
Re: MM Docket Nos. 91-221, 87-8, 94-150, 92-51 and 87-154
Television Station WTVX(TV), Fort Pierce, Florida

Dear Sir or Madam:

On behalf of Whitehead Media of Florida, Inc., licensee of Television Station WTVX(TV), Fort Pierce, Florida, 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 Fort Pierce-34, Inc. and Whitehead Media of Florida, Inc, the licensee of Television Station WTVX(TV), Fort Pierce, Florida.

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 024
List ABOVE

LMA REPLY FORM

MARKET: WEST PALM BEACH-FT. PIERCE, FLORIDA

DMA # 44

	<u>Channel No. & Call Sign</u>	<u>Network Affiliation</u>	<u>Licensed Community</u>	<u>Owner/ Licensee</u>	Degree of Overlap (%)	Nielsen(all day) Audience Share (9am - midnight)		
					City Grade	Grade A	Grade B	11/96
Brokered Station:	Channel 34 WTVX(TV)	UPN	Ft. Pierce, Florida	Whitehead Media of Florida, Inc.	City Grade A and Grade B overlap (Engineering Supplement to be provided)	3	3	2
Brokering Station:	Channel 25 WPBF-TV	ABC	Tequesta, Florida	Paxson Communications of Ft. Pierce-34, Inc.		10	9	10

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
	12/29/95	10 years	12/29/95	12/29/05	Mutually agreed upon term.	Up to 96.4% (162 hours/week)

PUBLIC INTEREST BENEFITS RESULTING FROM ENTERING INTO THE LMA

The Time Brokerage Agreement was entered into together with funding provided by Paxson Communications Corporation to enable Whitehead Media of Florida, Inc. to acquire WTVX(TV), Fort Pierce, Florida. The station was in bankruptcy and the combination of the funding and LMA permitted Whitehead Media of Florida, Inc., a company wholly-owned by an African-American, to acquire this television station.

The TBA has permitted both stations to co-locate their studios and facilities and has resulted in cost savings that have benefitted both stations. This co-location has allowed the stations to save on rent, utility, maintenance costs and administrative costs with the result that WTVX(TV) has been able to secure an UPN affiliation for its station.

Without the TBA, Whitehead Media of Florida, Inc. would not have been able to purchase the station out of bankruptcy and to operate it in manner that has enabled it to increase its service to the community including its affiliation with UPN.