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July 8, 1997

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FEDERAL COMMUNICATIONS COMMISSION  
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**BY HAND DELIVERY**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: MM Docket No. 91-221 ✓  
MM Docket No. 87-8  
MM Docket No. 94-150  
MM Docket No. 92-51  
MM Docket No. 87-154

Dear Mr. Caton:

Transmitted herewith, on behalf of Communications Corporation of America, are an original and four copies of its "Report on Existing Television Local Marketing Agreements," submitted pursuant to the Commission's Public Notice, "Commission Seeks Further Information Regarding Television LMA's", 62 Fed. Reg. 33792 (June 23, 1997).

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,  
FLETCHER, HEALD & HILDRETH, P.L.C.

*Anne Goodwin Crump*

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Enclosures

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BEFORE THE

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Federal Communications Commission

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WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Review of the Commission's Regulations Governing Television Broadcasting	)	MM Docket No. 91-221
	)	
Television Satellite Stations Review of Policy and Rules	)	MM Docket No. 87-8
	)	
Review of the Commission's Regulations Governing Attribution of Broadcast and Cable/MDS Interests	)	MM Docket No. 94-150
	)	
Review of the Commission's Regulations and Policies Affecting Investment in the Broadcast Industry	)	MM Docket No. 92-51
	)	
Re-examination of the Commission's Cross-Interest Policy	)	MM Docket No. 87-154
	)	

Directed to: The Commission

**REPORT ON EXISTING TELEVISION LOCAL MARKETING AGREEMENTS**

Communications Corporation of America ("CCA"), by its attorneys and pursuant to the Commission's Public Notice, "Commission Seeks Further Information Regarding Television LMA's", 62 Fed. Reg. 33792 (June 23, 1997), hereby respectfully submits its report with regard to existing television local marketing agreements ("LMA's") to which it is a party.

**I. Background**

1. CCA is a party to two LMA's, which involve stations in Shreveport, Louisiana, and Waco/Killeen, Texas. While CCA is not itself the licensee of stations in either of those markets,

it is the ultimate parent company of ComCorp of Texas License Corp., which is the licensee of KMSS-TV, Shreveport, Louisiana, and KWKT(TV), Waco, Texas.

2. CCA entered into Time Brokerage Agreements (LMA's) with White Knight Broadcasting of Shreveport License Corp. ("White Knight - Shreveport"), licensee of KSHV(TV), and White Knight Broadcasting of Killeen License Corp. ("White Knight - Killeen"), licensee of KAKW(TV). While the agreements were executed as of January 11, 1996, they have never actually been put into effect.

3. CCA is also a party to Commercial Inventory Agreements with both White Knight - Shreveport and White Knight - Killeen. These agreements do not, however, involve the provision of any programming to the White Knight stations. Rather, the Commercial Inventory Agreements provide for CCA to sell commercial advertising time for and provide accounting and other office services to KSHV(TV) and KAKW(TV) in return for revenues from the advertising time sold.

4. The LMA's between CCA and White Knight - Shreveport and White Knight - Killeen were entered into to provide a back-up position. At the time that the LMA's were entered into, both KAKW(TV) and KSHV(TV) were essentially start-up operations. Indeed, White Knight - Killeen had just acquired the construction permit for KAKW(TV), and the station did not commence regular broadcast operations until May 31, 1996. Although White Knight - Shreveport acquired a license for KSHV(TV), the station had not yet been on the air for even two years at the time that the LMA was executed. At the time that the LMA's were entered into, White Knight - Killeen and White Knight - Shreveport fully intended to select, contract for, and air its own programming for KAKW(TV) and KSHV(TV), and they have in fact carried out this

intention. Nevertheless, in light of the fact that the stations were start-up operations, and in light of possible Commission rule changes which would prohibit future LMA's, White Knight - Killeen and White Knight - Shreveport determined that they would enter into LMA's to provide a fall-back position in the event of future difficulties. White Knight - Killeen and White Knight - Shreveport continue to maintain the agreements with CCA as a fall-back position.

## **II. Description of LMA's**

### **A. KMSS-TV/KAKW(TV)**

(1) Stations Involved

- a. KMSS-TV, Shreveport, Louisiana, Channel 33, licensed to ComCorp of Texas License Corp., a subsidiary of CCA (the broker)
- b. KSHV(TV), Shreveport, Louisiana, Channel 45, licensed to White Knight Broadcasting of Shreveport License Corp.

(2) Name and Rank of Nielsen DMA

Shreveport - Rank 77

(3) Signal Contour Overlap

KMSS-TV and KSHV(TV) are co-located and thus have a substantial degree of overlap of city grade, Grade A, and Grade B signal contours.

(4) Date of LMA

January 11, 1996

(5) Term of LMA

The initial term is for five years after the Broker begins providing programming. The term is automatically renewed for two additional five year terms unless the Broker provides to the licensee at least 180 days notice of Broker's intent not to renew. The licensee may terminate the agreement upon 90 days written notice.

(6) Percentage of Time Brokered

No programming time - see Background, above

- (7) Network Affiliation  
KMSS-TV - Fox affiliate  
KSHV(TV) - UPN/WB affiliate

- (8) Nielsen Share

Not applicable - no programming provided - see Background, above

- (9) Other Information

See Background, above

#### **B. KWKT(TV)/KAKW(TV)**

- (1) Stations Involved

- a. KWKT(TV), Waco, Texas, Channel 44, licensed to ComCorp of Texas License Corp., a subsidiary of CCA (the broker)
- b. KAKW(TV), Killeen, Texas, Channel 62, licensed to White Knight Broadcasting of Killeen License Corp.

- (2) Name and Rank of Nielsen DMA

Waco/Temple/Bryan - Rank 94

- (3) Signal Contour Overlap

KWKT(TV) and KAKW(TV) are co-located and thus have a substantial degree of overlap of city grade, Grade A, and Grade B signal contours.

- (4) Date of LMA

January 11, 1996

- (5) Term of LMA

The initial term is for five years after the Broker begins providing programming. The term is automatically renewed for two additional five year terms unless the Broker provides to the licensee at least 180 days notice of Broker's intent not to renew. The licensee may terminate the agreement upon 90 days written notice.

(6) Percentage of Time Brokered

No programming time - see Background, above

(7) Network Affiliation

KWKT(TV) - Fox affiliate

KAKW(TV) - UPN/WB affiliate

(8) Nielsen Share

Not applicable - no programming provided - see Background, above

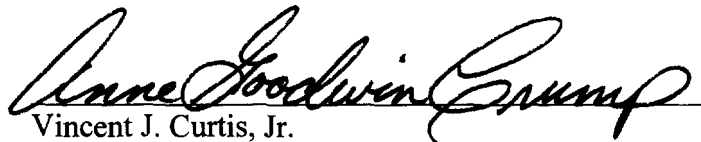
(9) Other Information

See Background, above

Respectfully submitted,

COMMUNICATIONS CORPORATION OF AMERICA

By:



Vincent J. Curtis, Jr.

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Its Attorneys

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