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July 8, 1997

Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

In re: Submission of Information Regarding LMAs
Docket Nos. 91-221, 87-8, 94-150, 92-51 and 87-154

Dear Sir:

This response is filed on behalf of Stations WNYS(TV), Syracuse, New York, the "Brokered Station" and WSYT(TV), Syracuse, New York the "Brokering Station" in response to the Commission's Public Notice requesting additional information contained in local marketing agreements (LMAs). The information requested is supplied in the same numerical sequence as contained in the Public Notice.

1.	**Brokered Station**	**Brokering Station**
Licensee:	RKM Media, Inc.	Max Television of Syracuse L.P.
Call Letters:	WNYS(TV)	WSYT(TV)
Channel:	43	68
Community of License:	Syracuse, New York	Syracuse, New York

2. Name and rank of DMA in which Brokered and Brokering Stations are Located:

Syracuse, New York
Neilsen DMA Rank 68

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3. Common area of overlap, indicated as percentage of total contours:

	City Grade	Grade A	Grade B
WNYS	89% of WSYT	91% of WSYT	92% of WSYT
WSYT	100% of WNYS	100% of WNYS	100% of WNYS

4. LMA entered December 21, 1995.

5.

Start/End Dates	Renewal Provision
July 2, 1996 - July 1, 2006	Negotiations for one or more additional terms shall commence 18 months prior to termination date. Brokering station has right of first refusal if LMA entered with third party.

6. Contract provides for Brokering Station to provide 158 weekly hours, barring preemption by Brokered Station (this would constitute 94% of operation).

7. Brokered Station - UPN
Brokering Station - Fox

8. Share of all day audience in three most recent rating period:

	5/97	2/97	11/96
Brokered Station	2	2	0
Brokering Station	6	6	6

9. Submitted herewith by Station WNYS is a summary of public interest benefits that have occurred as a result of the LMA between the stations.

Sincerely,

RKM Media, Inc.

By: _____
James P. Riley
Its Attorney

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Max Television of Syracuse L.P.

By: _____
William M. Barnard
Its Attorney

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WNYS-TV Public Interest Benefits

Prior to the Time Brokerage Agreement, station WNYS-TV was a full power licensee broadcasting at only 18,000 watts and having a very limited reach in the DMA. Under the Time Brokerage Agreement, WNYS-TV was rebuilt at a significant investment--increasing its power to 780,000 watts ERP and increasing its antenna height from its location on top of a 100 foot building to its co-location at 1,000 feet on WSYT's broadcast tower. Due to these improvements, WNYS improved its broadcast reach from approximately 45% of the population in the DMA to nearly 100%. Cable carriage was greatly enhanced and the station now reaches 97% of cable homes vs. 47% previously.

The Time Brokerage Agreement created a bonafide fifth station in the market and allowed WNYS to greatly improve its program offerings to the viewers in the Syracuse DMA. Brokering Station, WSYT, also invested significant cash resources to provide better programming for the station including local sports and entertainment such as:

- Syracuse University and Big East Football and Basketball (at a total cost in excess of $250,000 per year).

- Top notch syndicated fare including the three *Star Trek* franchises and *Grace Under Fire.*

It also enabled the station to better serve the community by:

- Increasing Children's Educational Programming immediately from 30 minutes to 90 minutes weekly and in the fall 1997 to an anticipated **four hours** weekly--all in post 8:00 a.m. time periods.

- Launching a locally produced Public Affairs show in March 1997 that airs in the prominent time period of 11:00 a.m. Sundays.

- Becoming involved in community events--the station had done zero in the past. In less than a year, WNYS has sponsored two National Kidney Foundation Fundraisers, Coaches vs. Cancer, Syracuse Winterfest, a March of Dimes event, an ongoing school oriented recognition program called *Class Act*, and many more on-the-air and off-the-air initiatives.

The Time Brokerage Agreement created twenty (20) new jobs--jobs that did not exist because previously the station had been operating with a skeleton crew.

The stations have achieved operating efficiencies in almost all areas by sharing facilities, personnel, and other resources.

The rebirth of this station also provides TV advertisers with an affordable alternative to the bigger and more expensive network affiliates of NBC, CBS, ABC, and FOX.