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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, and 87-154
Television Station WUPL(TV), Slidell, Louisiana

Dear Mr. Caton:

On behalf of Cox Broadcasting, Inc. ("Cox"), and in connection with the above-referenced proceedings, we submit herewith Cox's response to the FCC's June 17, 1997 Public Notice requesting information on television local marketing agreements.

Cox is the programmer of Television Station WUPL(TV), Channel 54, Slidell, Louisiana pursuant to a Time Brokerage Agreement dated as of May 1, 1996 (the "TBA") between Cox and Cornerstone, Inc., the licensee of WUPL(TV). WUPL(TV) is located in the New Orleans, Louisiana Designated Market Area ("DMA") which is ranked 41st in the country. Cox owns no other television stations in the New Orleans DMA; however, its affiliate, Cox Communications, Inc., owns several cable systems serving communities in the DMA.

WUPL(TV) is an affiliate of the UPN network. Under the TBA, Cox provides programming to the station for approximately 162 hours or 96.4% of the broadcast week. The remaining time during the week is reserved to Cornerstone and Cornerstone may use any additional time it may need to serve the public interest through other programming. During the three most recent Nielsen ratings periods, WUPL(TV) had an audience share of 2 for November 1996, 3 for February 1997 and 3 for May 1997.

The TBA commenced on May 1, 1996, and the initial term of the agreement is three years from that date. Either party has the option of extending this initial three-year term as may be necessary to permit Cox to acquire the stock of Cornerstone's parent company pursuant to FCC approval. The terms for this acquisition are outlined in a Put and Call

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Mr. William F. Caton

July 8, 1997

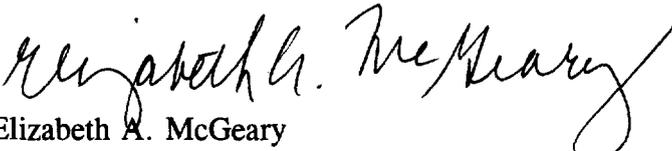
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Agreement dated as of May 1, 1996 among Cox, Cornerstone, its parent, Middle America Communications, Inc. and the shareholders of Middle America Communications, Inc.

The time brokerage arrangement between Cox and Cornerstone has had several important public interest benefits. In September 1996, for example, the station began airing three hours per week of children's educational and informational programming. Prior to that time, the station had only been airing two and one-half hours of children's educational programming per week. The station also airs a greater variety of public service announcements ("PSAs") and is able to target its PSAs more effectively to the local community than was possible prior to commencement of the LMA. As an example, the station recently began airing a series of PSAs designed to educate children on bicycle and swimming safety. The station is actively involved in Partnership for a Drug-Free America and is airing a series of PSAs designed to educate children about the dangers of using drugs. WUPL(TV) also recently began airing a series of "Community Calendar" spots which provide viewers with information on local community events. Finally, during the past year, Cox has assisted Cornerstone in the technical development and implementation of the station's Emergency Alert System.

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

Very truly yours,


Elizabeth A. McGeary

cc: Barry Friedman, Esq.