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July 8, 1997

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Attention: Policy and Rules Division
Stop Code 1800D

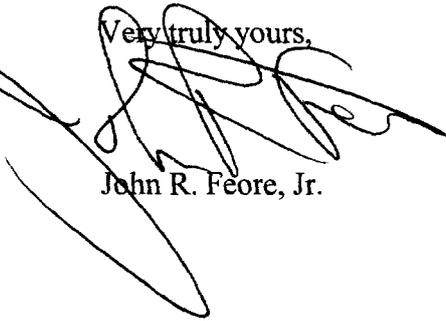
Re: MM Docket Nos. 91-221/87-8, 94-150, 92-51 and 87-154
Television Station WNGM(TV), Athens, Georgia

Dear Sir or Madam:

On behalf of Whitehead Media of Georgia, Inc., licensee of Television Station WNGM(TV), Athens, Georgia, 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 Atlanta-14, Inc. and Whitehead Media of Georgia, Inc, the licensee of Television Station WNGM(TV), Athens, Georgia.

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

Very truly yours,


John R. Feore, Jr.

JRF/lkr
Enclosure

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LMA REPLY FORM

MARKET: ATLANTA, GEORGIA

DMA #: 10

					Degree of Overlap (%)			Nielsen (all day) Audience Share (9am - midnight)				
					City Grade	Grade A	Grade B	11/96	2/97	5/97		
Brokered Station:	Channel No. & Call Sign Channel 34 WNGM(TV)	Network Affiliation Independent	Licensed Community Athens, GA	Owner/Licensee Whitehead Media of Georgia, Inc.	City Grade, Grade A and Grade B overlap (Engineering Supplement to be provided)				Not Available			
Brokering Station:	Channel 14 WTLK-TV	Independent	Rome, GA	Paxson Communications of Atlanta-14, Inc.					Not Available			

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	4/19/96	4/19/06	May be renewed for an additional term as mutually agreed upon by both parties	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 a Loan Agreement by which Paxson Communications provided the funding for Whitehead Media of Georgia, Inc. to acquire WNGM(TV), Athens, Georgia. The combination of the funding and LMA permitted Whitehead Media of Georgia, Inc., a company wholly-owned by an African-American, to acquire this television station.

The TBA has permitted both stations to streamline and economize their operations. Prior to the TBA, the stations had separate facilities and offices. The stations have since co-located the majority of their facilities accessible to the residents of each station's community of license. The co-location has also allowed the stations to save on rent, utility and maintenance costs and to upgrade technical equipment in facilities as necessary. Administrative functions also have been combined to a certain extent resulting in efficiencies in the areas of sales and traffic coordination. The cost savings the station have realized have translated into enhanced public affairs, news and entertainment programming.

In summary, under the TBA, these stations have been able to expand their public service efforts and achieve economies of scale that have resulted in a more efficient operation.