

DOW, LOHNES & ALBERTSON, PLLC
ATTORNEYS AT LAW

ORIGINAL

JOHN R. FEORE, JR.
DIRECT DIAL 202-776-2786
jfeore@dialaw.com

WASHINGTON, D.C.

1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20004-4000
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

DOCKET FILE COPY ORIGINAL

July 8, 1997

RECEIVED

JUL - 8 1997

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

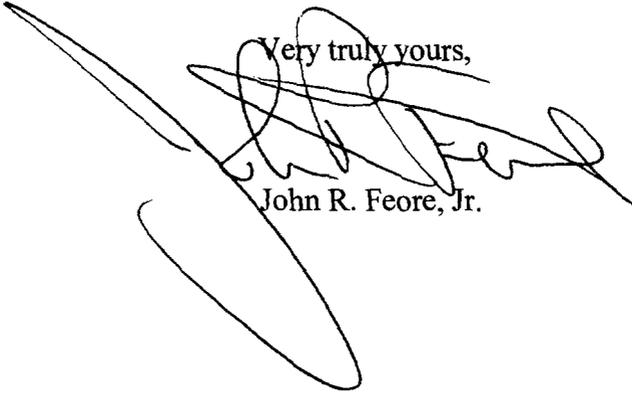
Re: MM Docket Nos. 91-221, 87-8, 94-150, 92-51 and 87-154
Television Station WCTD(TV), Miami, Florida

Dear Sir or Madam:

On behalf of Channel 35 of Miami, Inc., licensee of Television Station WCTD(TV), Miami, 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 Miami-35, Inc. and Channel 35 of Miami, Inc, the licensee of Television Station WCTD(TV), Miami, Florida.

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

Very truly yours,


John R. Feore, Jr.

JRF/lkr
Enclosure

Number of Copies rec'd
LIST CODE



LMA REPLY FORM

MARKET: MIAMI-FORT LAUDERDALE, FLORIDA

DMA #: 16

	<u>Channel No. & Call Sign</u>	<u>Network Affiliation</u>	<u>Licensed Community</u>	<u>Owner/ Licensee</u>	<u>Degree of Overlap (%)</u>			<u>Nielsen (all day) Audience Share (9am - midnight)</u>			
					<u>City Grade</u>	<u>Grade A</u>	<u>Grade B</u>	<u>11/96</u>	<u>2/97</u>	<u>5/97</u>	
Brokered Station:	Channel 35 WCTD(TV)	Independent	Miami, FL	Channel 35 of Miami, Inc.							Not Available
Brokering Station:	None	N/A	N/A	Paxson Communica- tions of Miami- 35, Inc.		N/A					

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
	1/4/94	5 years	3/31/94	3/31/99	(1) 5 year renewal term (2) at Programmer's option (3) Notice of exercise of option to renew must be delivered to Licensee no later than 180 days prior to expiration of initial term	Up to 50% (84 hours/week)

PUBLIC INTEREST BENEFITS RESULTING FROM ENTERING INTO THE LMA

PUBLIC INTEREST SHOWING FOR WCTD

The WCTD(TV) Time Brokerage Agreement was combined with financing by Paxson Communications of Miami-35, Inc. that enabled Channel 35 of Miami, Inc. a subsidiary of The Christian Network, Inc. to acquire WCTD(TV), Miami, Florida. Without the programming opportunity, Paxson Communications would not have been willing to provide the financing for the acquisition of this station that enabled CNI to obtain an over-the-air outlet for its Worship programming for up to seventy hours per week.