

ORIGINAL

FISHER WAYLAND COOPER LEADER & ZARAGOZA L.L.P.

2001 PENNSYLVANIA AVENUE, N.W.

SUITE 400

WASHINGTON, D. C. 20006-1851

TELEPHONE (202) 659-3494

RICHARD R. ZARAGOZA

(202) 775-5660

July 8, 1997

DOCKET FILE COPY ORIGINAL FACSIMILE (202) 659-6518

FACSIMILE

INTERNET

rzaragoza@fwclz.com

VIA HAND DELIVERY

Mr. William F. Caton

Acting Secretary

Federal Communications Commission

1919 M Street, N.W., Room 222

Washington, D.C. 20554

92-51 RECEIVED JUL - 8 1997

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

DOCKET FILE COPY ORIGINAL

Re: MM Docket Nos. 91-221, 87-8, 94-150, 92-51 and 87-154

Dear Mr. Caton:

On behalf of US Broadcast Group Licensee L.L.C. ("US Broadcast Group"), this letter is submitted in response to the Commission's Public Notice released June 17, 1997 requesting certain information concerning television local marketing agreements.

The numbered paragraphs that follow correspond to the corresponding information requests contained in the Public Notice:

1. US Broadcast Group has brokered time from Evergreen License Corp., licensee of WATM-TV, Channel 23, Altoona, PA since March of 1996. US Broadcast Group is the ultimate parent of US Broadcast Group Licensee L.P. I, licensee of WWCP-TV, Channel 8, Johnstown, PA which was acquired effective March 12, 1996.
2. Both stations are located in the Johnstown-Altoona, PA Nielsen Designated Market Area (Market Rank 92).
3. The predicted Grade B contours of the stations overlap, but there is no predicted city grade or predicted Grade A overlap. Based on US Broadcast Group's engineering studies, the predicted Grade B overlap is 2498 sq. km. (11.0% of WWCP-TV and 33.0% of WATM-TV) and 172,883 persons (6.4% of WWCP-TV and 48.0% of WATM-TV). However, using the Terrain Integrated Rough Earth Model alternative method of calculation, the Grade B overlap is actually only 557 sq. km. (2.5% of WWCP-TV and 7.4% of WATM-TV) and 27,962 persons (1.0% of WWCP-TV and 7.8% of WATM-TV).
4. The parties entered into an Interim Operating Agreement ("IOA") on March 11, 1996 which was amended November 1, 1996.

1 of 2 copies rec'd  
Lina M. COSE

0+2

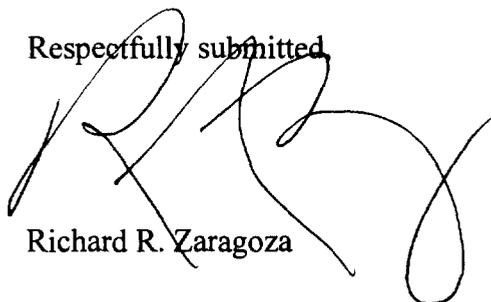
5. The amended IOA provides for a term ending on May 21, 2006. There is no provision for any extension or renewal.
6. Evergreen License Corp. has made available to US Broadcast Group all of WATM-TV's programming time, except the licensee of WATM-TV retains the responsibility for broadcasting all ABC network programming and for such programming as it determines is appropriate to respond to ascertained issues of community concern, including children's programming.
7. WWCP-TV is affiliated with the Fox Broadcasting Network, and WATM-TV is affiliated with the ABC Network.
8. The Nielsen household audience ratings and shares, measured 9:00 am to 12:00 midnight, are as follows:

	<b>WWCP-TV Rating/Share</b>	<b>WATM-TV Rating/Share</b>
May '97	2/5	2/5
February '97	2/6	2/4
November '96	2/6	2/6

9. It is extremely important that the Commission grandfather the WATM-TV LMA. Fundamental fairness dictates this result as well as the efficiencies and public interest benefits flowing from the ownership of WWCP-TV and the programming of WATM-TV. See the showings made by US Broadcast Group in connection with its pending application FCC File No. BALCT-950821KK to acquire WATM-TV.

US Broadcast Group reserves the right to supplement this filing.

Respectfully submitted



Richard R. Zaragoza