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July 8, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

Re: Clear Channel Television, Inc.
Submission of Information Regarding Television LMAs
MM Docket Nos. 91-221, 87-8, 94-150, 92-51, and 87-154

Ladies and Gentlemen:

In Public Notice DA 97-1246, released June 17, 1997 (the "Notice"), the Commission ("FCC") requested that parties to all existing television local marketing agreements ("LMA") provide certain factual information regarding the terms and characteristics of these agreements. The Notice lists nine items of information that must be submitted.

Clear Channel Television, Inc. ("CCT") is a party to nine (9) LMAs. With respect to each LMA, the following outline addresses each of the items of information with the exception of the ninth item requested in the Notice which is addressed separately.

I. Memphis, Tennessee

1. Stations, Licensee, Call Letters, Channel Number and Community of Licensee

- a. Brokered Station: WLMT-TV and WMTU-TV (satellite of WLMT-TV)
 - 1. Licensee: Television Marketing Group of Memphis, Inc. and Television Marketing Group of Jackson, Inc.
 - 2. Call Letters: WLMT-TV and WMTU-TV
 - 3. Channel Number: Channel 30 and Channel 16

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4. Community of License: Memphis, TN and Jackson, TN
- b. Brokering Station: WPTY-TV
 1. Licensee: Clear Channel Television Licenses, Inc.
 2. Call Letters: WPTY-TV
 3. ~~Channel Number: Channel 24~~
 4. Community of License: Memphis, TN
2. Name and Rank of the Nielsen Designated Market Area(s)

Memphis, Tennessee Rank #42
3. WPTY and WLMT have overlapping city grade signal contours. WPTY and WMTU have overlapping grade A signal contours.
4. Date of LMA: August 19, 1993
5. Terms of the LMA
 - a. The start and end dates of the initial term of the LMA are as follows: August 19, 1993 until 12:00 midnight on July 31, 2003.
 - b. The LMA automatically renews for a period of five years unless either party provides written notice of non-renewal no later than the close of business July 31, 2002.
6. Percentage of Brokered Station's Weekly Broadcast Hours that is brokered to the Brokering Station

CCT provides programming for a substantial amount of the brokered station's broadcast day on a daily basis throughout the year. However, the licensee of the brokered station has the obligation to ascertain that programming responds to the needs and concerns of the community of license and has the right to preempt the brokering station's programming as is necessary to broadcast its own programming which is responsive to issues of concern to the communities of the license and to children. Furthermore, the licensee of the brokered station may preempt or delete any programming of CCT which it believes is unsuitable or contrary to the public

interest and may substitute programming which, in its opinion, is of greater local or national importance.

7. The brokered station, **WLMT-TV**, is affiliated with **UPN** 9 a.m. through midnight. The brokering station, **WPTY-TV**, is affiliated with **ABC**.
8. The reported Nielsen all-day audience shares (measuring 9 a.m. through midnight) for the last three most recent rating periods were as follows:

	<u>Nov.-96</u>	<u>Feb.-97</u>	<u>May-97</u>
WLMT-TV (brokered)	7	6	8
WPTY-TV (brokering)	9	7	8

II. Lancaster, Pennsylvania

1. Stations, Licensee, Call Letters, Channel Number and Community of License

- a. **Brokered Station: WLYH-TV**
 1. Licensee: Gateway Communications, Inc.
 2. Call Letters: WLYH-TV
 3. Channel Number: Channel 15
 4. Community of License: Lancaster, PA
- b. **Brokering Station: WHP-TV**
 1. Licensee: Clear Channel Television Licenses, Inc.
 2. Call Letters: WHP-TV
 3. Channel Number: Channel 21
 4. Community of License: Harrisburg, PA

2. Name and Rank of the Nielsen Designated Market Area(s)

Harrisburg-Lancaster-Lebanon-York, PA Rank #45

3. The brokering and brokered stations have overlapping city grade signal contours.
4. Date of EMA: October 31, 1995

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5. **Terms of the LMA**
- a. The start and end dates of the initial term of the LMA are as follows: November 1, 1995 until 12:00 midnight on December 31, 2015.
 - b. The LMA automatically renews for a period of five years unless either party provides written notice of non-renewal no later than the close of business December 31, 2014.
6. **Percentage of Brokered Station's Weekly Broadcast Hours that is brokered to the Brokering Station**
- CCT provides programming for a substantial amount of the brokered station's broadcast day on a daily basis throughout the year. However, the licensee of the brokered station has the obligation to ascertain that programming responds to the needs and concerns of the community of license and has the right to preempt the brokering station's programming as is necessary to broadcast its own programming which is responsive to issues of concern to the communities of the license and to children. Furthermore, the licensee of the brokered station may preempt or delete any programming of CCT which it believes is unsuitable or contrary to the public interest and may substitute programming which, in its independent opinion, is of greater local or national importance.
7. The brokered station, **WLYH-TV**, is affiliated with **UPN**.
The brokering station, **WHP-TV**, is affiliated with **CBS**.
8. The reported Nielsen all-day audience shares (measuring 9 a.m. through midnight) for the last three most recent rating periods were as follows:

	<u>Nov.-96</u>	<u>Feb.-97</u>	<u>May-97</u>
WLYH-TV (brokered)	2	2	2
WHP-TV (brokering)	11	13	11

III. **Mobile, Alabama and Pensacola, Florida**

1. Stations, Licensee, Call Letters, Channel Number and Community of License

- a. **Brokered Station: WJTC-TV Channel 44**
 - 1. Licensee: Mercury Broadcasting Company, Inc.
 - 2. Call Letters: WJTC-TV
 - 3. Channel Number: Channel 44
 - 4. Community of License: Pensacola, FL

- b. **Brokering Station: WPML-TV Providence, RI**
 - 1. Licensee: Clear Channel Television Licenses, Inc.
 - 2. Call Letters: WPML-TV Channel 15
 - 3. Channel Number: Channel 15
 - 4. Community of License: Mobile, AL

2. Name and Rank of the Nielsen Designated Market Area(s)

Mobile, AL-Pensacola, FL Rank #61

3. The brokering and brokered stations have overlapping city grade signal contours.

4. Date of LMA: December 31, 1994

5. Terms of the LMA

- a. The start and end dates of the initial term of the LMA are as follows:
January 1, 1995 until 12:00 midnight on December 31, 2004.
- b. ~~The LMA shall automatically renew for a period of five years unless either party provides written notice of non-renewal no later than the close of business December 31, 2003. The LMA shall automatically renew for a second five year period unless the first renewal period does not occur or unless either party provides written notice of non-renewal to the other party no later than December 31, 2007.~~

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6. Percentage of Brokered Station's Weekly Broadcast Hours that is brokered to the Brokering Station

CCT provides programming for a substantial amount of the brokered station's broadcast day on a daily basis throughout the year. However, the licensee of the brokered station has the obligation to ascertain that programming responds to the needs and concerns of the community of license and has the right to preempt the brokered station's programming as is necessary to broadcast its own programming which is responsive to issues of concern to the communities of the license and to children. Furthermore, the licensee of the brokered station may preempt or delete any programming of CCT which it believes is unsuitable or contrary to the public interest and may substitute programming which, in its independent opinion, is of greater local or national importance.

7. The brokered station, WJTC-TV, is affiliated with UPN.
The brokering station, WPMI-TV, is affiliated with NBC.

8. The reported Nielsen all-day audience shares (measuring 9 a.m. through midnight) for the last three most recent rating periods were as follows:

	<u>Nov.-96</u>	<u>Feb.-97</u>	<u>May-97</u>
WJTC-TV (brokered)	4	4	4
WPMI-TV (brokering)	11	10	10

IV. Jacksonville, Florida

1. Stations, Licensee, Call Letters, Channel Number and Community of License

a. Brokered Station: WTEV-TV (formerly WNFT-TV)

1. Licensee: RDS Broadcasting, Inc.
2. Call Letters: WTEV-TV; Station and Community of License
3. Channel Number: Channel 47
4. Community of License: Jacksonville, FL

b. Brokering Station: WAWS-TV

1. Licensee: Clear Channel Television Licenses, Inc.
2. Call Letters: WAWS-TV
3. Channel Number: Channel 30
4. Community of License: Jacksonville, FL
2. Name and Rank of the Nielsen Designated Market Area(s)
Jacksonville, FL-Brunswick, GA Rank #54
3. The brokering and brokered stations have overlapping city grade signal contours.
4. Date of LMA: June 22, 1995
5. Terms of the LMA
 - a. The start and end dates of the initial term of the LMA are as follows:
September 25, 1995 until 12:00 midnight on February 1, 1997.
 - b. The LMA may be renewed twice, for two additional five year periods, should either party provide written notice of its intent to renew to the other party no later than the close of business ninety days prior to the end of the then current term. The LMA was renewed.
6. Percentage of Brokered Station's Weekly Broadcast Hours that is brokered to the Brokering Station

CCT provides programming for a substantial amount of the brokered station's broadcast day on a daily basis throughout the year. However, the licensee of the brokered station has the obligation to ascertain that programming responds to the needs and concerns of the community of license and has the right to preempt the brokering station's programming as is necessary to broadcast its own programming which is responsive to issues of concern to the communities of the license and to children. Furthermore, the licensee of the brokered station may preempt or delete any programming of CCT which it believes is unsuitable or contrary to the public interest and may substitute programming which, in its independent opinion, is of greater local or national importance.

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7. The brokered station, WTEV-TV, is affiliated with UPN.
The brokering station, WAWS-TV, is affiliated with Fox.
8. The reported Nielsen all-day audience shares (measuring 9 a.m. through midnight) for the last three most recent rating periods were as follows:

	<u>Nov.-96</u>	<u>Feb.-97</u>	<u>May-97</u>
WTEV-TV (brokered)	4	4	3
WAWS-TV (brokering)	9	9	7

V. Tulsa, Oklahoma

1. Stations, Licensee, Call Letters, Channel Number and Community of License

a. Brokered Station: KTFO-TV

1. Licensee: RDS Broadcasting, Inc.

2. Call Letters: KTFO-TV

3. Channel Number: Channel 41

4. Community of License: Tulsa, OK

b. Brokering Station: KOKI-TV

1. Licensee: Clear Channel Television Licenses, inc.

2. Call Letters: KOKI-TV

3. Channel Number: Channel 23

4. Community of License: Tulsa, OK

2. Name and Rank of the Nielsen Designated Market Area(s)

Tulsa, OK Rank #58

3. The brokering and brokered stations have overlapping city grade signal contours.

4. Date of LMA: November 14, 1993

5. Terms of the LMA

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- a. The start and end dates of the initial term of the LMA are as follows:
November 3, 1993 until 12:00 midnight on December 31, 2003.
- b. The LMA shall automatically renew for an additional period of five years unless either party provides written notice of non-renewal no later than the close of business on December 31, 2002.

6. Percentage of Brokered Station's Weekly Broadcast Hours that is brokered to the Brokering Station

CCT provides programming for a substantial amount of the brokered station's broadcast day on a daily basis throughout the year. However, the licensee of the brokered station has the obligation to ascertain that programming responds to the needs and concerns of the community of license and has the right to preempt the brokering station's programming as is necessary to broadcast its own programming which is responsive to issues of concern to the communities of the license and to children. Furthermore, the licensee of the brokered station may preempt or delete any programming of CCT which it believes is unsuitable or contrary to the public interest and may substitute programming which, in its independent opinion, is of greater local or national importance.

7. The brokered station, KTFO-TV, is affiliated with UPN.
The brokering station, KOKI-TV, is affiliated with Fox.

8. The reported Nielsen all-day audience shares (measuring 9 a.m. through midnight) for the last three most recent rating periods were as follows:

	<u>Nov.-96</u>	<u>Feb.-97</u>	<u>May-97</u>
KTFO-TV (brokered)	2	2	3
KOKI-TV (brokering)	11	8	7

VI. Providence, Rhode Island

1. Stations, Licensee, Call Letters, Channel Number and Community of License

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- a. **Brokered Station: WNAC-TV**
 1. **Licensee: WNAC Argyle Television, Inc.**
 2. **Call Letters: WNAC-TV**
 3. **Channel Number: Channel 64**
 4. **Community of License: Providence, RI**
- b. **Brokering Station: WPRI-TV**
 1. **Licensee: Clear Channel Television Licenses, Inc.**
 2. **Call Letters: WPRI-TV**
 3. **Channel Number: Channel 12**
 4. **Community of License: Providence, RI**

2. **Name and Rank of the Nielsen Designated Market Area(s)**

Providence, RI-New Bedford, MA Rank #47

3. **The brokering and brokered stations have overlapping city grade signal contours.**

4. **Date of LMA: June 10, 1996**

5. **Terms of the LMA:**

a. **The start and end dates of the initial term of the LMA are as follows: June 30, 1996 until ten years after (i.e., July 1, 2006).**

b. **The LMA may be renewed twice, for two additional ten year periods. In each instance, the should either party provide written notice of its intent to renew to the other party no later than the close of business ninety days prior to the end of the then current term.**

6. **Percentage of Brokered Station's Weekly Broadcast Hours that is brokered to the Brokering Station**

According to the terms of the LMA, CCT agrees to provide programming and announcement matter sufficient to program an amount of time equal to the difference of (i) one hundred sixty-four (164) hours of the brokered station's broadcast week on a daily basis throughout the year and (ii) such time as is

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necessary and sufficient for the licensee of the brokered station to broadcast programming provided by Fox Broadcasting Company under the terms of a certain affiliation agreement dated January 5, 1995. Furthermore, the licensee of the brokered station has the obligation to ascertain that programming responds to the needs and concerns of the community of license and has the right to preempt all of CCT's programming in order to broadcast its own programming which is responsive to issues of concern to the communities of the license and to children. In addition, the licensee of the brokered station may preempt or delete any programming which it believes is unsuitable or contrary to the public interest and may substitute programming which, in its independent opinion, is of greater local or national importance.

7. The brokered station, WNAC-TV, is affiliated with Fox.
The brokering station, WPRI-TV, is affiliated with CBS.
8. The reported Nielsen all-day audience shares (measuring 9 a.m. through midnight) for the last three most recent rating periods were as follows:

	<u>Nov.-96</u>	<u>Feb.-97</u>	<u>May-97</u>
WNAC-TV (brokered)	4	4	4
WPRI-TV (brokering)	14	15	15

VII. Little Rock, Arkansas

1. Stations, Licensee, Call Letters, Channel Number and Community of License
 - a. Brokered Station: KASN-TV
 1. Licensee: Mercury Broadcasting, Inc.
 2. Call Letters: KASN-TV

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3. Channel Number: Channel 38
 4. Community of License: Pine Bluff, Arkansas
- b. Brokering Station: KLRT-TV
 1. Licensee: Clear Channel Television Licenses, Inc.
 2. Call Letters: KLRT-TV
 3. Channel Number: Channel 16
 4. Community of License: Little Rock, Arkansas
2. Name and Rank of the Nielsen Designated Market Area(s)

Little Rock-Pine Bluff, ARK	Rank # 57
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3. The brokering and brokered stations have overlapping city grade signal contours.
4. Date of LMA: December 31, 1994
5. Terms of the LMA
 - a. The start and end dates of the initial term of the LMA are as follows: January 1, 1995 until 12:00 midnight on December 31, 2004.
 - b. The LMA shall automatically renew for a period of five years unless either party provides written notice of non-renewal no later than the close of business December 31, 2003. The LMA shall automatically renew for a second five year period unless the first renewal period does not occur or unless either party provides written notice of non-renewal to the other party no later than December 31, 2007.
6. Percentage of Brokered Station's Weekly Broadcast Hours that is brokered to the Brokering Station

CCT provides programming for a substantial amount of the brokered station's broadcast day on a daily basis throughout the year. However, the licensee of the brokered station has the obligation to ascertain that programming responds to the needs and concerns of the community of license and has the right to preempt the brokering station's programming as is necessary to broadcast its own programming

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which is responsive to issues of concern to the communities of the license and to children. Furthermore, the licensee of the brokered station may preempt or delete any programming which it believes is unsuitable or contrary to the public interest and may substitute programming which, in its independent opinion, is of greater local or national importance.

7. The brokered station, KASN-TV, is affiliated with UPN.
The brokering station, KLRT-TV, is affiliated with Fox.
8. The reported Nielsen all-day audience shares (measuring 9 a.m. through midnight) for the last three most recent rating periods were as follows:

	<u>Nov.-96</u>	<u>Feb.-97</u>	<u>May-97</u>
KASN-TV (brokered)	3	3	3
KLRT-TV (brokering)	8	7	6

VIII. Hutchinson, Kansas

CCT entered into an LMA with Three Feathers Communications, Inc. ("Three-Feathers") on February 1, 1996 regarding a new television broadcast station to be constructed on Channel 36 in Hutchinson, Kansas. With respect to this LMA, Three Feathers is submitting all the information requested in the Notice.

Hutchinson, Kansas

IX. Tucson, Arizona

1. Stations, Licensee, Call Letters, Channel Number and Community of License

a. Brokered Station: KTTU-TV

1. Licensee: Clear Channel Television Licenses, Inc.
2. Call Letters: KTTU-TV
3. Channel Number: Channel 18
4. Community of License: Tucson, Arizona

b. Brokering Station: KMSB-TV

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1. Licensee: KMSB-TV, Inc.
2. Call Letters: KMSB-TV
3. Channel Number: Channel 11
4. Community of License: Tucson, Arizona

2. Name and Rank of the Nielsen Designated Market Area(s)

Tucson (Nogales), Arizona Rank #78

3. The brokering and brokered stations have overlapping city grade signal contours.

4. Date of LMA: October 7, 1991

5. Terms of the LMA

- a. The start and end dates of the initial term of the LMA are as follows:
October 6, 1991 until the final day of the ten-year period following the start date.
- b. The LMA shall automatically renew for an additional period of five years unless either party provides written notice of non-renewal within 180 days prior to the expiration of the initial term.

6. Percentage of Brokered Station's Weekly Broadcast Hours that is brokered to the Brokering Station

The brokering station provides programming for a substantial amount of the brokered station's broadcast day on a daily basis throughout the year. However, the licensee of the brokered station has the obligation to ascertain that programming responds to the needs and concerns of the community of license and the right to preempt the brokering station's programming as is necessary to broadcast its own programming that is responsive to issues of concern to the communities of the license and to children. Furthermore, the licensee of the brokered station may preempt or delete, or substitute any programming which it believes is unsuitable or contrary to the public interest and may substitute

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programming which, in its independent opinion, is of greater local or national importance.

7. The brokered station, KTTU-TV, is an affiliate of UPN. The brokering station, KMSB-TV, is an affiliate of Fox.
8. The Nielsen all-day audience market share will be provided by the licensee of the brokering station: KMSB-TV, Inc.

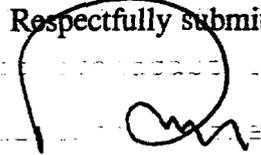
The ninth item in the Notice asks for any information regarding efficiencies or public interest benefits that have resulted from the LMAs. Attached as Exhibit A is a pleading that was filed with the FCC on March 21, 1997 which addresses the information requested in item nine of the Notice.

Moreover, with respect to five of the eight LMAs of which CCT is a party, the average combined audience share of the brokered and the brokering stations in each LMA is less than the average market share of any of the remaining ABC, NBC, or CBS affiliated networks in each designated market area. These designated market areas include: Memphis, TN; Little Rock, AR, Mobile, AL, Harrisburg, PA, and Tulsa, OK. Although the combined average market share of WAWS-TV and WTEV-TV in Jacksonville, Florida does exceed the market share of ABC in that area, the combined average market share is still substantially less than CBS and NBC in the Jacksonville, Florida area. The combined average market share of WPRI-TV and WNAC-TV in Providence, Rhode Island does exceed the market share of ABC, but it is still substantially less than NBC, the dominant network in the Providence, Rhode Island area. In each instance, the LMA has served to create a viable competitor to the other major network facilities in that market. Attached as Exhibit B is a chart of the audience market shares of the television stations in each of the above designated market areas.

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Accompanying this report is a diskette of this submission in WordPerfect- DOS, version 5.1 format.

Respectfully submitted,



Richard J. Bodorff

Enclosure

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAR 21 1997

In the matter of

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Review of the Commission's)	
Regulations Governing)	MM Docket No. 91-221
Television Broadcasting)	
)	
Review of Commission's)	
Regulations Governing Attribution)	MM Docket No. 96-150
of Broadcast and Cable/MDS)	
Interests)	

To: ~~The Commission~~

Reply Comments of Clear Channel Communications, Inc.

Clear Channel Communications, Inc. ("Clear Channel") hereby submits its reply comments in the above-referenced proceedings. Clear Channel, through a wholly-owned indirect subsidiary, Clear Channel Television Licenses, Inc. ("CCT") is the licensee of 12 commercial television stations---WAWS-TV, Jacksonville, FL; WPMI-TV, Mobile, AL; WPTY-TV, Memphis, TN; KOKI-TV, Tulsa, OK; KTTU-TV, Tucson, AZ; KSAS-TV, Wichita, KS; KAAS-TV, Salina, KS; KLRT-TV, Little Rock, AR; WFTC-TV, Minneapolis, MN; WXXA-TV, Albany, NY; WHP-TV, Harrisburg, PA; and WPRI-TV, Providence, RI. Seven of these stations program substantially all of the broadcast time of another local television station---in each case a UHF facility---pursuant to time brokerage local marketing agreements ("LMAs").

The purpose of this reply is to address the comments of those parties who oppose the grandfathering of television LMAs or are generally adverse to their existence. These commenters include BET Holdings, Frances Dillard (an individual), Jet Broadcasting Co., Inc., Media Access Project, et al. and Post-Newsweek Stations, Inc. The reply demonstrates, based on Clear Channel's many years of practical experience with TV LMAs, that they do provide clear public interest benefits. As described in greater detail below, the benefits include the rejuvenation of failed or failing stations, the delivery of locally produced news and public affairs programming, and a general upgrade in the quality of operation of the brokered station. Based upon this experience and these public interest benefits, Clear Channel supports full permanent grandfathering on a non-attributable basis, of all existing TV LMAs. Further, Clear Channel believes the duopoly rule should be relaxed to allow UHF/UHF or UHF/VHF combinations in the same market.

Jacksonville, Florida

In Jacksonville, Florida, WNFT-TV, now WTEV-TV, a UHF facility, had failed. It had filed for bankruptcy protection under Chapter 11. Before CCT, licensee of WAWS-TV, another UHF station in the Jacksonville market, began its LMA, WTEV-TV's programming consisted primarily of paid infomercials and barter programming. Also, WTEV-TV was neither producing nor broadcasting any local news or

providing any community service. The station's signal was technically deficient and the station had a negative image in the community.

Subsequent to entering into the LMA, CCT provided the funds necessary for capital improvements and much-needed maintenance including upgrading WTEV's audio signal to stereo. CCT improved the station's programming, and was instrumental in causing the station to affiliate with UPN and obtaining Orlando Magic basketball and SEC football. Furthermore, because of the LMA, WTEV-TV now broadcasts public service announcements, local programming, and three hours per week of educational children's programming. It is anticipated that, in the fall of 1997, WTEV-TV will begin to produce and broadcast an early evening half-hour newscast.

Mobile, Alabama-Pensacola, Florida

On March 15, 1993, CCT, licensee of WPMI-TV, a Mobile, Alabama, UHF station, entered into a joint sales agreement ("JSA"), and, subsequently, a local marketing agreement with WJTC-TV, a UHF station in neighboring Pensacola, FL. Before CCT became involved, WJTC-TV faced such severe financial difficulty that it was frequently off the air. For example, the station did not broadcast during much of the May 1992 sweeps period. Recognizing the poor quality of the station in the market, major program syndicators accepted unpopular time periods on other area stations rather than prime time on

WJTC-TV. Finally, little to no public service was being performed and no programming was locally originated.

CCT provided funds required to improve WJTC-TV's physical plant and technical operations. CCT engineering personnel were loaned to WJTC-TV, and the Station's on-air look was upgraded. As a result, syndicators developed confidence in WJTC-TV and the quality of its program schedule improved. WJTC-TV was offered improved cable television channel positions and ratings tripled during the first year of the LMA. WJTC-TV was then able to enhance its public service with a weekly half-hour public affairs program which aired in early fringe and, later, a 9:00 p.m. news program. New programming broadcast on WJTC-TV as a result of the LMA includes a locally-produced and hosted pet show, a fix-it-yourself show, and an interior design program. Also WJTC-TV carries University of Southern Alabama basketball games in prime time which allows the University to increase its ability to raise funds through advertiser support.

The LMA has also resulted in efficiencies and economies of scale that took WJTC-TV from an inefficiently-organized, potentially failing station to a financially viable entity that is now a source of quality syndicated programming, local programming, news and community service. The LMA also resulted in saving precious jobs that would otherwise have been lost had WJTC-TV been forced off the air. In fact, over time, the total number of jobs rose for both stations as a direct result of the advantages of combined operation.

Little Rock, Arkansas

In Little Rock, where CCT is the licensee of UHF station KLRT-TV, similar facts are present. CCT entered into a JSA and later an LMA, with KASN-TV, a UHF station licensed to neighboring Pine Bluff, Arkansas. KASN-TV had been losing substantial sums of money and was frequently off the air.

Since CCT became involved, it has provided more than \$400,000 for improved equipment which, among other things, will soon permit the station to broadcast in stereo. KASN-TV now broadcasts a quality signal into southeast Arkansas, whose needs were otherwise inadequately served, and even today are not adequately addressed by two of the three network affiliates in the market.

Further, KASN-TV carries two annual telethons sponsored by the United Negro College Fund and the Arthritis Foundation which had been dropped by other stations in the market. KASN-TV has also materially improved the quality of its programming. As a result of the LMA, it now carries a weekly public affairs program, four hours of children's educational programming, and the full UPN network lineup.

To better serve the area's large minority population KASN-TV programs the 5:00 pm to 7:00 p.m. time period to appeal to the African-American community. KASN-TV produces educational vignettes for children in its daily KIDSLAND segment and, through the LMA, has sponsored an award-winning teen page on the Internet with monthly surveys on various issues of public importance. As a result of the LMA, KASN-TV

now runs a large number of public service announcements (90 for adults and 68 for children in an average week) and its prime time ratings have improved by 50%.

Without an LMA, KASN-TV would not have been able to raise money for the United Negro College Fund and the Arthritis Foundation, provide educational programming, carry public affairs programming, or sponsor surveys of young adults in its market.

Tulsa, Oklahoma

In Tulsa, Oklahoma, where CCT operates KOKI-TV, a UHF station, KTFO-TV was a failing station. KTFO had been off the air for two years, and although it had resumed broadcast operations, was losing nearly a million dollars per year. Absent the LMA, KTFO probably would have gone dark again. The station was airing little or no locally-produced programming or public service programming and there was no children's educational programming. The program schedule consisted primarily of barter programming and infomercials.

As a result of the LMA, KTFO-TV now has 4.5 hours of children's educational programming per week, with an increase to 5.5 hours per week scheduled for the fall of 1997. KTFO-TV is a local sponsor of groups such as Oklahoma Kids, an organization that fights drugs through the performances of children singing and dancing across the state. KTFO-TV also supports many local charities and community groups and events with on-air sponsorships. The station is a sponsor of

approximately 20 family/community events and shows each year in Tulsa.

As a result of the LMA, KTFO now broadcasts a more complete line-up of family programs and has greatly reduced the number of hours of infomercials. Through the LMA, KTFO will soon increase its news, information and weather programming for the market.

Lancaster, Pennsylvania

WLYH-TV, a UHF station licensed to Lancaster, Pennsylvania, was one of two CBS affiliates in the Harrisburg-Lancaster-Lebanon-York market where CCT operates WHP-TV, also a UHF station. When WLYH was not broadcasting duplicative CBS programming it was preempting both network and syndicated programming to air a large number of half-hour paid infomercials. Nonetheless, WLYH-TV was losing money and in danger of going dark.

As a result of an LMA with CCT, the market no longer receives duplicative CBS programming. Instead, WLYH-TV broadcasts the entire United Paramount Network ("UPN") lineup as well as other quality programming previously unavailable in the market. Included is three (3) hours per week of educational children's programming, which will increase to four (4) hours per week in the fall of 1997. WLYH has also added a 10:00 p.m. newscast using WHP-TV personnel, that regularly covers news events specific to Lebanon, Pennsylvania, something that no other station in the market is doing. Further, CCT has provided \$1.5 million for capital

investments at WLYH-TV, including upgrades to its news capabilities, and an additional \$1.4 million to cover operational expenses for news and programming. The result of the LMA has been more program diversity at WLYH-TV, a local news product, additional educational children's programming, and better signal quality.

Providence, Rhode Island

In Providence, Rhode Island, CCT is the licensee of WPRI-TV. WNAC-TV, the UHF Fox affiliate in Providence, was suffering from low ratings, and had no news product, no public service programming and only one half-hour locally produced program, a "Bozo" children's show consisting mostly of cartoon reruns. Since CCT and WNAC entered into an LMA, WNAC-TV's performance has been vastly improved. Recently, it received recognition from Fox as a "most-improved station". As a result of the LMA, WNAC now broadcasts the market's first 10:00 p.m. newscast. While the broadcast features WPRI-TV employees, it is entirely different from the news broadcast by WPRI-TV.

As a result of the LMA, WNAC-TV also broadcasts a Community Calendar that publicizes community and charitable events, and spearheads a "Christmas in April" event which helps to renovate houses of the underprivileged in Providence.

Memphis, Tennessee

In Memphis, Tennessee, CCT operates WPTY-TV, a UHF station. WPTY was originally affiliated with Fox, but recently switched to ABC. The current owners of WLMT-TV, also a UHF facility in the market, and the previous owner had been unable to generate any cash flow and were losing money.

CCT began an LMA with WLMT several years ago. As a result of the LMA, WLMT-TV now airs a daily news product directed toward the needs of the African-American population of Memphis, the 13th largest African-American DMA. The program, the only newscast of this type in the country, includes features which concentrate on health issues of concern to African-Americans and upon their culture, history, and contributions to the city of Memphis. The cost and risk of the venture are such that the program would never have been possible absent the economies of scale (e.g., combined studio, set and personnel) arising out of the LMA. In fact, the previous licensee broadcast no news at all.

In addition, since ABC programming fills more of the broadcast day on WPTY than did Fox programming, much of WPTY-TV's pre-purchased programming is now broadcast on WLMT-TV. Absent the LMA, this popular programming would air on WPTY at odd times or not be broadcast at all.

Also as a result of the LMA, WLMT-TV has been able to broadcast sporting events that otherwise would not be aired in the market, such as prime time telecasts of University of Memphis and SEC tournament basketball.