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November 24, 1998

RECEIVED
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie R. Salas, Esquire
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: *Ex Parte* Presentation
Paxson Communications Corporation
MM Docket Nos. 91-221; 87-7; 87-8; 96-222

Dear Ms. Salas:

Pursuant to Section 1.106 of the Commission's Rules, the attached written submissions to the Commissioners' are submitted in duplicate to be associated with the files in the above-referenced proceedings.

Very truly yours,

John R. Feore, Jr.

JRF/ls
Enclosure

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November 20, 1998

RECEIVED
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Chairman William E. Kennard
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Dear Chairman Kennard:

On behalf of Bud Paxson and Paxson Communications Corporation ("Paxson"), I am forwarding to you Paxson's Proposal for increasing the diversity of television ownership and encouraging the development of emerging television networks through the retention and utilization of the UHF discount and single majority shareholder rule. Paxson has discussed this Proposal with members of the Senate Communications Subcommittee and the House Telecommunications Subcommittee and members of both Subcommittees are expected to contact you to register their support for the Paxson Proposal.

Paxson and Ed Parker continue to work on finalizing their business arrangements for EPCOM, Inc. that were preliminarily outlined for you last week. It should be noted that in addition to the discussion of the single majority shareholder rule in the attached Proposal, it is anticipated that EPCOM, Inc. will have three directors (two designated by Ed Parker and one designated by Paxson) and that Ed Parker will be the President and CEO of the Company. Paxson and Ed Parker intend to submit to the Commission for pre-approval the documentation regarding their venture as soon as those documents are substantially complete.

Best regards.

Cordially yours,

John R. Feore, Jr.

JRF/ls
Enclosure
cc: Susan Fox, Senior Legal Advisor

DC03/195603-1

POSITIONS FOR FCC POLICY DECISIONS - DECEMBER, 1998
PRESENTED BY
PAXSON COMMUNICATIONS CORPORATION

* * * * *

STATEMENT OF TELEVISION OWNERSHIP
AND
A PROPOSAL TO INCREASE BROADCAST DIVERSITY

The Commission's pending ownership rulemakings should be the vehicle for new rules reflecting the current competitive marketplace and, at the same time, creating a structure that will increase minority, female and new entrant ownership of television stations. There are two significant prongs to this plan.

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VIA HAND DELIVERY

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1919 M Street, N.W., Room 832
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Enclosure
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November 20, 1998

VIA HAND DELIVERY

Commissioner Harold Furchtgott-Roth
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20554

Dear Commissioner Furchtgott-Roth:

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JRF/ls
Enclosure
cc: Helgi C. Walker, Legal Advisor

DC03/195603-1

POSITIONS FOR FCC POLICY DECISIONS - DECEMBER, 1998
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November 20, 1998

VIA HAND DELIVERY

Commissioner Gloria Tristani
Federal Communications Commission
1919 M Street, N.W., Room 826
Washington, D.C. 20554

Dear Commissioner Tristani:

On behalf of Bud Paxson and Paxson Communications Corporation ("Paxson"), I am forwarding to you Paxson's Proposal for increasing the diversity of television ownership and encouraging the development of emerging television networks through the retention and utilization of the UHF discount and single majority shareholder rule. Paxson has discussed this Proposal with members of the Senate Communications Subcommittee and the House Telecommunications Subcommittee and members of both Subcommittees are expected to contact you to register their support for the Paxson Proposal.

Best regards.

Cordially yours,

John R. Feore, Jr.

JRF/ls
Enclosure
cc: Rick Chessen, Senior Legal Advisor

DC03/195603-1

POSITIONS FOR FCC POLICY DECISIONS - DECEMBER, 1998
PRESENTED BY
PAXSON COMMUNICATIONS CORPORATION

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STATEMENT OF TELEVISION OWNERSHIP
AND
A PROPOSAL TO INCREASE BROADCAST DIVERSITY

The Commission's pending ownership rulemakings should be the vehicle for new rules reflecting the current competitive marketplace and, at the same time, creating a structure that will increase minority, female and new entrant ownership of television stations. There are two significant prongs to this plan.

Maintain the Existing UHF Discount in Calculating National Television Ownership to Encourage Emerging Networks

- The discount has been in place for 13 years and has been a major factor in the growth of UHF television.
- UHF television stations continue to operate with technical and economic disadvantages to VHF stations as consistently reflected in ratings disparities.
- DTV is continuing the UHF handicap with inadequate power allotments and cable carriage cannot eliminate the UHF/VHF disparity.
- Retaining the UHF discount serves the Commission's diversity and competition goals by encouraging the development of emerging networks such as PAXTV, WB, UPN, Univision and Telemundo.
- The emerging networks are built upon UHF stations and must, to be economically viable, own a significant portion of their distribution.

Retain the Single Majority Shareholder Rule as a Vehicle for Increasing Minority, Female and New Entrant Ownership of Television Stations

- The single majority shareholder rule will permit the emerging networks to hold up to 49% of the voting stock of a female, minority or new entrant-controlled station without having that station be attributable to the emerging network for either national or local ownership purposes.

- The emerging network would provide programming to the station via a standard Affiliation Agreement.
- The emerging network would work with the majority owner to obtain third party (e.g., bank) financing for the construction or purchase of the station.
- The emerging network would not have any option to purchase the station.
- The station licensee would be provided with significant time on a daily basis for the broadcast of non-network, local programming.
- The single majority shareholder would be in control of the ownership, programming, operation and ultimate disposition of the station.

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