

STAMP & RETURN

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of:)

MPS Media of Gainesville Licensee, LLP,)
Licensee of Station WNBW-DT,)
Gainesville, Florida)

CSR- _____

For Waiver of §§76.92(f) & 76.106 (a) of the)
Commission's Rules)

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To: Chief, Media Bureau

Federal Communications Commission
Bureau / Office

**PETITION FOR WAIVER OF SECTIONS
76.92(f) AND 76.106(a) OF THE COMMISSION'S RULES**

MPS Media of Gainesville Licensee, LLP, licensee of Television Station WNBW-DT, Gainesville, Florida (Facility ID No. 83965), by counsel, files this Petition for Waiver, pursuant to Section 76.7 of the Commission's Rules, and requests a waiver of the "significantly viewed" exception to the network non-duplication rule, 47 CFR § 76.92(f), and the syndicated exclusivity rule, 47 CFR § 76.106(a). This will allow WNBW-DT to exercise its network non-duplication and syndicated exclusivity rights with respect to Stations WESH(DT), Daytona Beach, Florida; WJXT(DT), Jacksonville, Florida; and WTLV(DT), Jacksonville, Florida (the "Stations"), in the areas in the Gainesville, Florida Designated Market Area ("DMA") outside of the city limits of Gainesville served by Cox Cable.¹

¹ In *WGFL License Corp.*, 22 FCC Rcd 1708 (2007), the Bureau waived the significantly viewed exception with respect to the same three stations for "the community of Gainesville, Florida." Although the viewing data submitted in that proceeding included all areas of the Gainesville DMA, Cox Cable has asserted that the Bureau's unopposed ruling there only applies to areas it serves within the city limits of Gainesville. The instant petition shows that the

The Bureau should grant this Petition because the distant signals from WESH, WJXT and WTLV are no longer significantly viewed in any part of the Gainesville DMA served by Cox Cable, and they are thus no longer eligible for the exceptions to the network non-duplication and syndicated exclusivity rules. A Nielsen study shows that the Stations have failed to achieve any ratings in the Gainesville DMA communities served by Cox Cable, and thus, are far from being significantly viewed. The Bureau should, therefore, grant this Petition.

The Applicable Standard

Once a television station notifies a cable system located in whole or in part in the station's protected geographic zone that it holds the exclusive right to distribute network and syndicated programs, the cable system is generally barred from carrying those programs as broadcast by any other television station.² Cable systems, however, may continue to carry network or syndicated programming of stations that are "significantly viewed" in a particular community.³ A station is deemed to be "significantly viewed" in a county if it was listed as such by the Commission in 1972 and in communities that have been added to that list in the intervening years.⁴

Although the Commission has not deleted stations from its 1972 list of significantly viewed signals, it has established standards for waivers when a station demonstrates that another station is no longer significantly viewed in a particular community or communities. *See KCST-*

Stations are not significantly viewed in all communities within the Gainesville DMA, both inside and outside of the Gainesville city limits, that are served by Cox Cable; the Commission is requested only to rule that Cox can no longer rely on the significantly viewed exception in areas it has claimed were not addressed in *WGFL License Corp.*

² 47 CFR §§ 79.92(a), 76.101.

³ *Id.* §§ 76.92(f); 76.106(a).

⁴ *Id.* § 76.54(a).

TV, 103 FCC 2d 407 (1986).⁵ To obtain a waiver of the significantly viewed exception, petitioners must submit a showing “from an independent professional audience survey of over-the-air television homes that covers at least two weekly periods separated by at least thirty (30) days but no more than one of which shall be a week between the months of April and September.”⁶ If two surveys are taken, “they . . . [must] include samples sufficient to assure that the combined surveys result in an average figure at least one standard error above the required viewing level.”⁷

In applying this standard, the Bureau has recognized that:

Over time, The Nielsen Company (“Nielsen”) became the primary surveying organization through which a petitioner could obtain television surveys. Nielsen, which routinely surveys television markets to obtain television stations’ viewership, conducts four-week audience surveys four times a year (*i.e.*, February, May, July and November “sweep periods”). The Bureau has found that replacing each week required under *KCST-TV* with a sweep period is acceptable and, if anything, adds to the accuracy of the audience statistics because of the increased sample size. Accordingly, a petitioner may submit the results from two sweep periods in each year.⁸

As shown below, the Bureau should conclude that each of the Stations is no longer significantly viewed in the communities in the Gainesville DMA served by Cox Cable. To avoid any doubt, the result would be that Cox Cable would not be able to rely on the significantly viewed exception for its systems serving any areas within the Gainesville DMA, both outside and inside the Gainesville city limits.

⁵ See also *KCST-TV, Inc. v. FCC*, 699 F.2d 1185, 1192 n.13 (D.C. Cir. 1983)(“if a station’s viewership . . . falls to nearly zero . . . it is obviously illogical for the Commission to deem the station significantly viewed”).

⁶ 47 CFR § 76.54(b).

⁷ *Id.*

⁸ *WUPW Broadcasting, LLC*, 25 FCC Rcd 2678, 2679-80 (2010).

Argument

WNBW-DT is the NBC affiliate licensed to Gainesville, Florida and serving the Gainesville DMA. The Gainesville DMA consists of four Florida counties – Alachua, Dixie, Gilchrist and Levy.

WESH is an NBC affiliate licensed to Orlando, Florida and serves the Orlando DMA. WESH is listed in the Commission's Significantly Viewed Stations list as significantly viewed in all four of the counties in the Gainesville DMA, which may reflect the fact that, at the time of the 1972 survey on which the Significantly Viewed Stations list is based, Gainesville did not have its own NBC affiliate.

WTLV is an NBC affiliate licensed to Jacksonville, Florida and serves the Jacksonville DMA. WTLV is listed in the Commission's Significantly Viewed Stations list as significantly viewed in Alachua, Dixie and Gilchrist counties. Again, much of this historic viewing may have been due to the absence of an NBC affiliate in Gainesville in 1972.

WJXT is an independent station licensed to Jacksonville, Florida and serves the Jacksonville DMA. WJXT broadcasts syndicated programming which is also broadcast on WNBW and to which WNBW has exclusive rights in the Gainesville DMA. WJXT is listed in the Commission's Significantly Viewed Stations list as significantly viewed in Alachua, Dixie, Gilchrist and Levy Counties.

To obtain a waiver of the significantly viewed exception to the network non-duplication and syndicated exclusivity rules, WNBW must demonstrate that WESH and WTLV no longer achieve a three percent (3%) share of weekly viewing hours and a net weekly circulation of 25 percent.⁹ Since WJXT is not a full or partial network station, WNBW must demonstrate that it

⁹ 47 CFR § 76.5(i).

does not achieve a two percent (2%) share of weekly viewing hours and a net weekly circulation of five percent (5%).¹⁰

Attached is a system-specific Significant Viewing Study conducted by Nielsen Media Research (the “Nielsen Study”) which demonstrates that the Stations are no longer significantly viewed in the communities in the Gainesville DMA – both inside and outside the Gainesville city limits – served by Cox Cable.¹¹ In fact, the Nielsen Study, which examined over-the-air viewing in July 2010, November 2010, May 2011 and November 2011, shows that the three stations failed to achieve any measurable over-the-air viewing in the areas in the Gainesville DMA served by Cox Cable.

The Nielsen Study conforms to the Commission’s standards regarding significantly viewed surveys. The Nielsen Study contains Nielsen’s detailed explanation of the methodology used to obtain the audience data. The Nielsen Study presents a retabulation of Nielsen’s routinely obtained audience data. It includes an explanation of how the relevant diaries were selected from Nielsen’s database as well as the weighting procedures Nielsen used, the standard error calculation applied, and other statistical methods Nielsen used to derive the audience estimates and associated standard error calculations. The Nielsen Study describes how Nielsen’s routinely-collected data were used to provide a representative sample demonstrating that the

¹⁰ *Id.*

¹¹ WNBW notified Cox Cable and all other required parties that it intended to commission Nielsen to prepare a significantly viewed audience survey using Nielsen viewing data. The notice complied with the requirements of Section 76.54(c) of the Rules and was served on potentially affected parties as required by that rule. The Commission has agreed that “[w]e would not read the advance notice provisions of Section 76.54(c) (advance notice of survey methodology to other interested parties) as precluding use of data already collected based on methodology previously approved by the Commission. In such cases, notice to other interested parties prior to purchase of data would suffice.” *Amendment of Parts 1, 63 and 76 of the Commission’s Rules*, 3 FCC Rcd 2617, 2620 n.23 (1988). WNBW did not receive any comments on or objections to its proposed study.

Stations' over-the-air viewing in the communities served by Cox Cable in the Gainesville DMA no longer meet the significant viewing standard.¹²

The Nielsen Study uses commercially-accepted audience data and tabulates viewing patterns in non-cable/non-ADS households based on zip codes associated with the Cox Cable service areas in the Gainesville DMA. The Commission has consistently accepted such surveys for purposes of demonstrating that a station is no longer significantly viewed, including the use of zip codes to identify the households in a particular community.¹³ The sample source for the Nielsen Study consisted of usable diaries from non-cable/non-ADS households in zip codes in the Cox Cable service areas in the Gainesville DMA, both in and out of the Gainesville city limits, during the months of July and November 2010 and May and November 2011.¹⁴

As shown below, the Nielsen Study confirms that the Stations are no longer significantly viewed. For each of the Stations, the Nielsen Study shows that they had no measurable viewing in the household sample. Each Station, therefore, had a zero share of weekly viewing and zero

¹² Similar Nielsen studies were the basis of granting petitions for waivers of the significantly viewed exception in *Saga Broadcasting, LLC*, 26 FCC Rcd 16851 (2011); *WUPW Broadcasting, LLC*, 25 FCC Rcd 2678, 2688-89 (2010); *KGAN Licensee, LLC*, 23 FCC Rcd 9534 (2008); *Meredith Corp.*, 22 FCC Rcd 12932 (2007); *Barrington Broadcasting Flint Corp.*, 19 FCC Rcd 22046 (2004); and *MMM License LLC*, 17 FCC Rcd 20875 (2002).

¹³ See, e.g., *Gulf-California Broadcast Co.*, 23 FCC Rcd 7406, 7409 (2008) (“Nielsen re-tabulates the over-the-air data that it collects for its routine audience sweep periods, selecting in-tab diaries from its database from the . . . individual cable community [based on zip code]”); *KSWB, Inc.*, 13 FCC Rcd 15470 (1998).

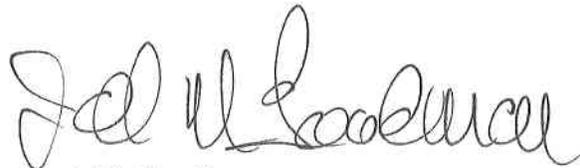
¹⁴ The Nielsen Study included 117 in-tab diaries for each of the four months studied. That number is well above the range of sample sizes in studies on which the Commission has previously relied. See *WUPW Broadcasting*, 25 FCC Rcd at 2682, 2689 (samples of 86 and 79); *Tribune Television Co.*, 24 FCC Rcd 1622 (2009)(sample sizes of 9, 19, 2, 4 and 2); *KGAN Licensee, LLC*, 23 FCC Rcd 9534 (2008)(sample sizes of 20 and 21); *Wyomedia Corp.*, 17 FCC Rcd 20348 (2002)(sample sizes of 32, 34, 30 and 26). As required in *Saga*, 26 FCC Rcd at 16853, WNBW is submitting the results for each of the individual sweeps periods.

percent of the average weekly circulation. Since no measurable viewing was shown, the standard error calculation was also zero.¹⁵

The Nielsen Study shows that, for all four sweeps periods, the Stations were not significantly viewed in the communities in the Gainesville DMA served by Cox Cable. Their viewing levels of zero fall far short of the standards for being considered significantly viewed.

Accordingly, MPS Media of Gainesville Licensee, LLC requests that the Commission waive the significantly viewed exception to the network non-duplication and syndicated exclusivity rules so that WNBW can assert its important program exclusivity rights in all areas of its local market of Gainesville, Florida, served by Cox Cable.

Respectfully submitted,



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*Counsel for MPS Media of Gainesville
Licensee, LLC*

July 5, 2012

¹⁵ Similar results have been held to support a waiver of the significantly viewed exception. In *WUPW Broadcasting*, where some of the studies also showed no measurable viewing and the resulting standard error was calculated as zero, the Commission understood, “[i]t does not necessarily mean that not one household viewed WJBK, but rather that when the reported viewing is converted to an audience share, the result is below Nielsen’s reporting minimum.” 25 FCC Rcd at 2689 n.96. See also *KSWB, Inc.*, 13 FCC Rcd at 15476 (accepting zero viewing, average weekly circulation and standard error calculations of zero).

VERIFICATION

The undersigned certifies that he has read the Petition for Waiver of Sections 76.92(f) and 76.106(a) of the Commission's Rules prepared for MPS Media of Gainesville Licensee, LLC, and to the best of his knowledge, information and belief formed after reasonable inquiry, it is well grounded in fact, is warranted by existing law, and it is not interposed for any improper purpose.

A handwritten signature in black ink that reads "Todd Senter". The signature is written in a cursive style with a large, sweeping initial "T".

Todd Senter
General Manager
WNBW-DT
1703 NW 80th Blvd.
Gainesville, FL 32606

July 5, 2012



The attached report provides audience net weekly circulation (cume) and share information among non-cable/non-ADS households for WESH, WJXT and WTLV during the Nielsen Station Index (NSI) survey conducted over four week periods during the July 2010, November 2010, May 2011 and November 2011 measurement periods. The report is based on series of Zip code group. Households will maintain the reported Nielsen Viewers in Profile (VIP) weights used to project in-tab sample households to universe estimates for their respective measurement periods. This study measures non-cable/non-ADS household viewing between 7AM-1AM, Monday to Sunday.

The sample source for this survey consisted of non-cable/non-ADS TV households returning usable television viewing diaries. NSI procedures were used for distributing diaries and for compiling the estimated audience projections in this report. Average quarter hour projections were computed by summing weights for quarter hours in the daypart for the non-cable/non-ADS in-tab households and dividing by the number of quarter hours in the daypart. The weights which were used for projections are those used to project in-tab sample households to universe estimates in the regular Nielsen Viewers in Profile analysis. Share and cume estimates as well as their respective standard errors are computed for each of the geographies as follows:

Shares of total viewing are computed by dividing average quarter hour M-Su 7AM-1AM projections of a given station for the non-cable/non-ADS in-tab households by the average quarter hour M-Su 7AM-1AM projections in non-cable/non-ADS households across all stations. The associated standard error is calculated using the accepted formula for computing the standard error of a ratio estimate and is shown below:

The average weekly circulation (cume) is an average of the four weeks of the measurement period. The cume was computed by summing the weights for all non-cable/non-ADS households tuning at least one quarter hour to a given station within the cycle during the M-Su 7AM-1AM daypart and dividing by the sum of all non-cable/non-ADS weights within the given measurement period for each week. The cume for each week in the measurement period is then summed and divided by the number of weeks in the measurement period to compute the average weekly cume. The associated standard error for the average weekly cume is calculated using the accepted formula for computing the standard error of a ratio estimate. This standard error is the error of the average weekly cume; it is not an average of the weekly standard error. The formulas used are shown below:

Share

$$Share = \frac{\sum_1^n (w * Qhrs(s))}{\sum_1^n (w * Qhrs(t))}$$

Share Standard Error



$$\text{Std Error} = \sqrt{\frac{n}{n-1} * \sum_1^n \left[\frac{(w * Qhrs(s)) - (\text{Share} * w * Qhrs(t))}{\sum_1^n (w * Qhrs(t))} \right]^2}$$

where n = number of intab households

where w = household weight

where $Qhrs(s)$ = total quarter hours tuned to station of interest by household

where $Qhrs(t)$ = total quarter hours tuned by household

Average Weekly Cume

$$\text{Average Weekly Cume} = \frac{1}{z} * \sum_1^z \left[\frac{\sum_1^n (HH \text{ Weight} * x)}{\sum_1^n HH \text{ Weight}} \right]$$

Average Weekly Cume Standard Error

$$\text{Std Error} = \sqrt{\frac{1}{z^2} \sum_1^z \left[\frac{n}{n-1} * \sum_1^n \left[\frac{(x - \text{Week Cume}) * HH \text{ Weight}}{\sum_1^n HH \text{ Weight}} \right]^2 \right]}$$

where z = number of weeks in analysis (with non-zero intabs)

where n = number of intab households in week

where $x = 0$ if household did not tune station of interest

where $x = 1$ if household did tune station of interest

The attached report is representative of the viewing patterns of the non-cable/non-ADS households of the geographic area surveyed.

Petition filed for "SYSTEM OF" ..

Petition filed for the following stations on the "Significantly Viewed" list in the Gainesville DMA.

| Gainesville DMA | |
|------------------|--|
| DMA Counties | Significantly Viewed Stations Listed by FCC |
| Alachua | WJXT-Jacksonville (IND) WTLV-Jacksonville (NBC) WESH-Orlando (NBC) |
| Dixie | WJXT-Jacksonville (IND) WTLV-Jacksonville (NBC) WESH-Orlando (NBC) WCTV-Tallahassee (CBS) WTSP-St.Petersburg (CBS) |
| Gilchrist | WJXT-Jacksonville (IND) WTLV-Jacksonville (NBC) WESH-Orlando (NBC) |
| Levy | WESH-Orlando (NBC) WJXT-Jacksonville (IND) WTSP-St.Petersburg (CBS) WTVT-Tampa (FOX) |

| ZIP Code | Mailing Name | State | County Name | Cable Company | Significantly Viewed Stations |
|----------|-----------------|-------|-------------|---------------|------------------------------------|
| 32625 | Cedar Key | FL | Levy | Brighthouse | WESH, WJXT, WTSP, WTVT |
| 32618 | Archer | FL | Alachua | Comcast | WESH, WJXT, WTLV, WTSP, WTVT |
| 32631 | Earleton | FL | Alachua | Comcast | WESH, WJXT, WTLV, WTSP, WTVT |
| 32694 | Waldo | FL | Alachua | Comcast | WESH, WJXT, WTLV, WTSP, WTVT |
| 32693 | Trenton | FL | Gilchrist | Comcast | WESH, WJXT, WTLV, WTSP, WTVT |
| 32693 | Fanning Springs | FL | Gilchrist | Comcast | WESH, WJXT, WTLV, WTSP, WTVT |
| 32696 | Williston | FL | Levy | Comcast | WESH, WJXT, WTLV, WTSP, WTVT |
| 34449 | Inglis | FL | Levy | Comcast | WESH, WJXT, WTLV, WTSP, WTVT |
| 34498 | Yankeetown | FL | Levy | Comcast | WESH, WJXT, WTLV, WTSP, WTVT |
| 32615 | Alachua | FL | Alachua | Communicom | WESH, WJXT, WTLV, WCTV, WTSP, WTVT |
| 32616 | Alachua | FL | Alachua | Communicom | WESH, WJXT, WTLV, WCTV, WTSP, WTVT |
| 32640 | Hawthorne | FL | Alachua | Communicom | WESH, WJXT, WTLV, WCTV, WTSP, WTVT |
| 32643 | High Springs | FL | Alachua | Communicom | WESH, WJXT, WTLV, WCTV, WTSP, WTVT |
| 32655 | High Springs | FL | Alachua | Communicom | WESH, WJXT, WTLV, WCTV, WTSP, WTVT |
| 32667 | Micanopy | FL | Alachua | Communicom | WESH, WJXT, WTLV, WCTV, WTSP, WTVT |
| 32628 | Cross City | FL | Dixie | Communicom | WESH, WJXT, WTLV, WCTV, WTSP, WTVT |
| 32692 | Suwannee | FL | Dixie | Communicom | WESH, WJXT, WTLV, WCTV, WTSP, WTVT |
| 32626 | Chiefland | FL | Levy | Communicom | WESH, WJXT, WTLV, WCTV, WTSP, WTVT |
| 32644 | Chiefland | FL | Levy | Communicom | WESH, WJXT, WTLV, WCTV, WTSP, WTVT |

| ZIP Code | Mailing Name | State | County Name | Cable Company | Significantly Viewed Stations |
|----------|-----------------|-------|-------------|---------------|-------------------------------|
| 32615 | Alachua | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32616 | Alachua | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32601 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32602 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32603 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32604 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32605 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32606 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32607 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32608 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32609 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32610 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32611 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32612 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32613 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32614 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32627 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32635 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32641 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32653 | Gainesville | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32669 | Newberry | FL | Alachua | Cox | WESH, WJXT, WTLV |
| 32640 | Hawthorne | FL | Alachua | Florida Cable | WESH, WJXT, WTLV, WTSP, WTVT |
| 32693 | Fanning Springs | FL | Gilchrist | Florida Cable | WESH, WJXT, WTLV, WTSP, WTVT |
| 32621 | Bronson | FL | Levy | Florida Cable | WESH, WJXT, WTLV, WTSP, WTVT |



Significant Viewing Study
 Gainesville
 Jul10, Nov10, May11 & Nov11
 Su-Sa 7A-1A
 WESH, WJXT & WTLV (Cox)

WESH

| Geography Grouping | Results | Jul10, Nov10, May11 & Nov11 combined |
|----------------------|---------------------|--------------------------------------|
| 32615, 32616, 32601, | Number of Intabs | 117 |
| 32602, 32603, 32604, | Average Weekly Cume | 0.00 |
| 32605, 32606, 32607, | Cume Std. Error | 0.00 |
| 32608, 32609, 32610, | Share | 0.00 |
| 32611, 32612, 32613, | Share Std. Error | 0.00 |
| 32614, 32627, 32635, | | |
| 32641, 32653, 32669 | | |

WJXT

| Geography Grouping | Results | Jul10, Nov10, May11 & Nov11 combined |
|----------------------|---------------------|--------------------------------------|
| 32615, 32616, 32601, | Number of Intabs | 117 |
| 32602, 32603, 32604, | Average Weekly Cume | 0.00 |
| 32605, 32606, 32607, | Cume Std. Error | 0.00 |
| 32608, 32609, 32610, | Share | 0.00 |
| 32611, 32612, 32613, | Share Std. Error | 0.00 |
| 32614, 32627, 32635, | | |
| 32641, 32653, 32669 | | |

WTLV

| Geography Grouping | Results | Jul10, Nov10, May11 & Nov11 combined |
|----------------------|---------------------|--------------------------------------|
| 32615, 32616, 32601, | Number of Intabs | 117 |
| 32602, 32603, 32604, | Average Weekly Cume | 0.00 |
| 32605, 32606, 32607, | Cume Std. Error | 0.00 |
| 32608, 32609, 32610, | Share | 0.00 |
| 32611, 32612, 32613, | Share Std. Error | 0.00 |
| 32614, 32627, 32635, | | |
| 32641, 32653, 32669 | | |

Certificate of Service

I, Jack N. Goodman, hereby certify that I have, this 5th day of July, 2012, caused to be sent by mail, first-class U.S. postage prepaid, copies of the foregoing "Petition for Waiver of Section 76.92(f) and 76.106(a) of the Commission's Rules" to the following:

Division of Corporations Cable and/or Video Franchising
Post Office Box 5678
Tallahassee, Florida 32314

General Manager
WOGX
4739 NW 52 Avenue #B
Gainesville, FL 32653

Dale Tapley
COX Communications
2205 La Vista Avenue
Pensacola, FL 32504

General Manager
WJXT
4 Broadcast Place
Jacksonville, FL 32207

Carolyn Barnett
WCJB
6220 NW 43rd Street
Gainesville, FL 32653

General Manager
WTLV
1070 East Adams Street
Jacksonville, FL 32202


Jack N. Goodman

**Agency Tracking ID:PGC2168470 Authorization
Number:06075C
Successful Authorization -- Date Paid: 7/25/12
FILE COPY ONLY!!**

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|--|--|--|
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| SECTION A - Payer Information | | |
| (2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) Law Offices of Jack N. Goodman | | (3) TOTAL AMOUNT PAID (dollars and cents) \$1355.00 |
| (4) STREET ADDRESS LINE NO. 1 1200 New Hampshire Ave, NW | | |
| (5) STREET ADDRESS LINE NO. 2 Suite 800 | | |
| (6) CITY Washington | | (7) STATE DC |
| (8) ZIP CODE 20036 | | |
| (9) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) 202-7762045 | | (10) COUNTRY CODE (IF NOT IN U.S.A.) US |
| FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED | | |
| (11) PAYER (FRN) 0020858528 | | (12) FCC USE ONLY |
| IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C) | | |
| (13) APPLICANT NAME Law Offices of Jack N. Goodman | | |
| (14) STREET ADDRESS LINE NO. 1 1200 New Hampshire Ave, NW | | |
| (15) STREET ADDRESS LINE NO. 2 Suite 800 | | |
| (16) CITY Washington | | (17) STATE DC |
| (18) ZIP CODE 20036 | | |
| (19) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) 202-7762045 | | (20) COUNTRY CODE (IF NOT IN U.S.A.) US |
| FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED | | |
| (21) APPLICANT (FRN) 0020858528 | | (22) FCC USE ONLY |
| COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET | | |
| (23A) FCC Call Sign/Other ID WNBW-DT | | (24A) Payment Type Code(PTC) TQC |
| (25A) Quantity 1 | | |
| (26A) Fee Due for (PTC) \$1,355.00 | | (27A) Total Fee \$1355.00 |
| FCC Use Only | | |
| (28A) FCC CODE 1 Gainesville | | (29A) FCC CODE 2 X |
| (23B) FCC Call Sign/Other ID | | (24B) Payment Type Code(PTC) |
| (25B) Quantity | | |
| (26B) Fee Due for (PTC) | | (27B) Total Fee |
| FCC Use Only | | |
| (28B) FCC CODE 1 | | (29B) FCC CODE 2 |