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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

GEORGETOWN UNIVERSITY LAW CENTER

INSTITUTE FOR PUBLIC REPRESENTATION

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November 3, 2000

VIA HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Room TW-A325
445 Twelfth Street, SW
Washington, DC 20554

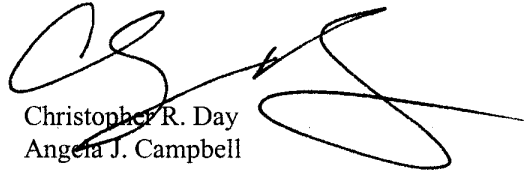
Re: Motion for Leave to Amend *Nunc Pro Tunc* Petition to Deny (Form 314 and 345) for Assignment of Licenses of KBHK-TV, KCOP-TV, KMOL-TV, KMSP-TV, KPTV(TV), KTVX(TV), KUTP(TV), WWOR-TV, WUTB(TV) and WRBW(TV) and associated translator stations: File Nos. BALCT-20000918ABB, ABC, ABD, ABF, ABK, ABL, ABM, ABN, ABU, ABY, ABG, ABH, ABI, ABJ, ABO, ABP, ABQ, ABR, ABS, ABV, ABW, ABX, ABZ, ACA, ACB, ACC, ACD, ACE

Dear Ms. Salas:

The Office of Communication, Inc. of the United Church of Christ, Black Citizens for a Fair Media, Center for Media Education, Consumer Federation of America, Consumers Union, New York Metropolitan Association of the United Church of Christ, Rainbow/PUSH Coalition, and Valley Community Access Television ("Movants"), through undersigned counsel, hereby file their Motion for Leave to Amend *Nunc Pro Tunc* the above-referenced Petition.

An original and four (4) copies of the Motion are enclosed. Should you have any questions concerning the Motion, please do not hesitate to contact the undersigned.

Respectfully submitted,



Christopher R. Day
Angela J. Campbell

Counsel for the Movants

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

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re Applications of)
)
UTV of San Francisco, Inc., KCOP Television,)
Inc., UTV of San Antonio, Inc., Oregon)
Television, Inc., UTV of Baltimore, Inc.,)
WWOR-TV, Inc., UTV of Orlando, Inc.)
United Television, Inc.)
(Assignors))
)
and)
)
FOX Television Stations, Inc.)
(Assignee))
)
For Consent to Assignment of Licenses)
for Stations KBHK-TV, San Francisco, CA;)
KCOP-TV, Los Angeles, CA; KMOL-TV,)
San Antonio, TX; KPTV-TV, Portland, OR;)
WUTB-TV, Baltimore, MD; WWOR-TV,)
Secaucus, NJ; WRBW-TV, Orlando, FL;)
KMSP-TV, Minneapolis, MN; KTVX-TV,)
Salt Lake City, UT; KUTP-TV, Phoenix, AZ)

File Nos. BALCT-20000918ABB,
ABC, ABD, ABF, ABK, ABL,
ABM, ABN, ABU, ABY, ABG,
ABH, ABI, ABJ, ABO, ABP, ABQ,
ABR, ABS, ABV, ABW, ABX,
ABZ, ACA, ACB, ACC, ACD, ACE

To the Commission:

**MOTION FOR LEAVE TO AMEND
PETITION TO DENY NUNC PRO TUNC**

The Office of Communication, Inc. of the United Church of Christ, Black Citizens for a Fair Media, Center for Media Education, Consumer Federation of America, Consumers Union, New York Metropolitan Association of the United Church of Christ, Rainbow/PUSH Coalition, and Valley Community Access Television ("Petitioners"), hereby motion for leave to amend their Petition to Deny the above-referenced Applications which was timely filed October 27, 2000, to add one additional Petitioner and to correct an error in the Summary to the Petition to Deny.

Petitioners request permission to add the Academy of Latino Leaders in Action (ALLA) as an additional Petitioner. As described in the attached declaration of Marta Samano, President and CEO of ALLA, a Los Angeles-based organization, whose members would be aggrieved by the grant of the Application. Because of the busy schedule of ALLA's President and the time difference between California and Washington, D.C., counsel for Petitioners did not receive the signed declaration in time to include it with the Petition to Deny.

The Parties to the above-referenced Applications would not be prejudiced by the addition of ALLA because the Petition to Deny already included organizations with members in the Los Angeles metropolitan area. Moreover, the arguments, reasoning, and evidence presented in the Petition remain unchanged.¹

Petitioners also seek leave to correct a mistaken error on page ii in the Summary of the Petition. In the second section of the second full paragraph of that page, Petitioners inadvertently wrote "post-merger" instead of "pre-merger." Thus, the second sentence of the second full paragraph on page ii should read, "In Phoenix, Fox alleges that eleven independent television voices exist pre-merger and, therefore, Fox's proposed duopoly conforms to the letter of the Commission's rules." This correction makes the Summary consistent with the text of the Petition on page 22. This correction does not prejudice the parties to the above-referenced Applications as it merely corrects a factual error and is consistent with the body of the Petition.

Respectfully submitted,



Christopher R. Day
Angela J. Campbell

Counsel for the Petitioners

¹Should the Commission decide not to grant this motion, Petitioners request that it treat ALLA's declaration as an informal objection pursuant to 47 C.F.R. § 73.3587.

CERTIFICATE OF SERVICE

I, Martha Rodriguez, hereby certify that I have this 3rd day of November, 2000, mailed by First Class mail, postage prepaid, a copy of the "Motion for Leave to Amend Petition to Deny Nunc Pro Tunc" to the following:

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The Honorable William E. Kennard, Chairman*
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The Honorable Harold Furchtgott-Roth*
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The Honorable Susan Ness*
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The Honorable Michael K. Powell*
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The Honorable Gloria Tristani*
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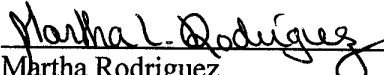
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