

## **EXHIBIT 13 - MAIN STUDIO LOCATION**

Applicant Oregon Public Broadcasting (OPB) proposes to locate the main studio of the new noncommercial educational FM broadcast station outside of the principal community contour of the station in accordance with Section 73.1125(b)(2) of the rules.

OPB is licensee of eight full service noncommercial educational radio stations in Oregon, including KOPB-FM, Portland; KOAC(AM), Corvallis; KRBM(FM), Pendleton, KOAB-FM, Bend, KOAP(FM), Lakeview, KTVR-FM, La Grande, KTMK(FM), Tillamook, and KOBK(FM), Baker City. It originates network programming from Stations KOPB-FM in Portland and KOAC in Corvallis. In 1992, OPB was granted a waiver to relocate its main studios for KRBM and KOAB-FM, designating KOPB-FM, Portland as the main studio location, and operating KRBM and KOAB-FM as satellite stations (FCC File No. BMPED-920423IE and BMPED-920423IG). Since then, KOAP, KTVR-FM, KTMK and KOBK all were granted waivers in their original construction permits to locate the main studio outside of the community, designating KOPB-FM, Portland as the main studio location, and operating the stations as satellite stations. OPB provides toll-free telephone access from all of these communities to the KOPB-FM studio and conducts regular and vigorous ascertainment activities in these communities to ensure that programming be specifically directed to the needs and interests of the residents of these communities.

Because of its relatively small size, it is most unlikely that The Dalles could economically sustain a local full-service public radio station. However, OPB has, in the past, received requests from The Dalles area residents to extend its public radio programming to their area, and in response to this request, OPB constructed an FM translator in The Dalles. This proposal will allow OPB to upgrade the present FM translator radio service to a full service FM broadcast station, which will provide better coverage and signal quality to this underserved area. Because of the economic benefits of centralized operations, this proposal requests that the KOPB-FM studio in Portland be specified as the main studio location for the proposed new FM broadcast station at The Dalles.

OPB will assure that the issues facing the The Dalles area are ascertained and that the station's program service will address those issues. OPB will originate programming from the The Dalles area when appropriate using remote origination equipment. Area residents will have toll-free telephone access to KOPB-FM in compliance with Section 73.1125 (e) of the rules. Also, in compliance with Section 73.3527 (c)(2) of the rules, the station's local public inspection file will be readily accessible to residents via telephone or internet email access, as well as direct inspection at the main studio.

OPB will maintain a number of ongoing activities for ascertainment of community needs and issues in The Dalles area, as follows:

- The members of the OPB Board of Directors are appointed to include representation of different geographic areas of Oregon. Twenty percent of the Board members are nominated by the Governor of the state of Oregon. Currently, of the 23 members

serving on the Board, 9 are from diverse regional areas in the state, with an additional 5 members from communities nearby but outside of Portland. OPB recruitment policy for Board and Committee vacancies includes a strong commitment to diversity in terms of age, gender, race and geographic location.

- OPB maintains online or paper subscriptions to a number of newspapers in various communities throughout Oregon. Plans are to expand this resource in the future and specific efforts will be directed to communities where OPB operates an FM station, including the proposed station in The Dalles.
- The OPB radio news room in Portland regularly sends reporters all over the state to cover local events and develop news segments that are aired on the entire OPB radio network. A full-time reporter is based in Salem, Oregon's state capital and seat of state government. In July, 2007, OPB launched a Central Oregon Bureau based in Bend, providing a full-time reporter to be on the ground covering events in the communities east of the Cascades.
- Each year, OPB inserts a comprehensive questionnaire into its monthly program guide, to solicit viewer and listener opinions about programming, and as a means of input regarding news and public affairs coverage of community issues.
- OPB operates an Audience Services Department staffed by full-time staff members who respond to telephone calls (including the 800 number calls), website emails, and letters from listeners and viewers. This department answers and/or refers calls ranging from complaints or comments about programming, to requests for information, to reports of technical problems. The service is staffed during regular work hours, but is available 24 hours a day, 7 days a week, to record listener comments and concerns.
- In March, 2007, OPB launched an expanded news website at [opbnews.org](http://opbnews.org), providing local, state, national and international news, a range of streamed and downloadable programming, and podcasts or audio downloads of many of OPB's most popular radio programming. Another recent new feature on the website is the "Town Square" online discussion forum, where Web users can post comments and engage in civil discourse about major issues impacting the Northwest. The goal of this "Town Square" forum is to create an online community dedicated to exploring the challenges communities face and the options and opportunities for change.
- In July, 2007, OPB received a grant from the Corporation for Public Broadcasting to research and develop the "Town Square" project. In addition to the online community mentioned above, the project includes the planned launch in January, 2008 of a new live, community-based talk show. Staff will travel to communities in the state and do a live radio program with an audience. Listeners will be invited to call in during the program and participate in the discussion. It will air Monday – Friday for one hour.

- On September 5, 2007, OPB aired its first program which launched another initiative providing interactive access to listeners. The Public Insight Network (PIN) invites listeners to sign up to participate as a source for news and information programming by sharing their experience and knowledge. This forum will not only allow OPB to draw on individuals' experience and knowledge with particular subjects, but will allow individuals an opportunity to actually help shape the news. Already 500 people have signed up with OPB's PIN and we expect to have at least 1,000 by January, 2008. Below are two examples of recent stories OPB aired that were informed by the Public Insight Network:

*Gresham Looks For New Way To Manage Rental Complaints*

*As inner Portland rental prices have increased, many families have moved to Gresham, which up to now hasn't had a code of standards for rental units. But now, the city of Gresham is holding a public meeting to talk about how its new rental housing inspection program might work.*

*Lack of Health Insurance Leads Many To Bankruptcy*

*Half of all Americans who file for personal bankruptcy say that medical expenses are a major factor, according to a Harvard study. A study by consumer group Families USA suggested that the number of uninsured Americans may be twice as high as previously believed. Kristian Foden-Vencil found some struggling Oregonians using OPB's new Public Insight Network, and has this report.*

- Input from OPB listeners regarding news and public affairs are considered in OPB's radio programming decisions and news coverage.

The Commission has traditionally allowed noncommercial educational licensees to operate in the manner proposed. See Nebraska Educational Television Commission, 4 RR 2d 771 (1965). As the Commission stated in Sound of Life, Inc., 4 FCC 2d 8273 (1989), "In so doing, the Commission recognizes the realities of public broadcasting funding and the ongoing problems of educational licensees in raising the necessary funds to expand and provide noncommercial educational programming to as many viewers as possible." In view of OPB's commitment to ascertainment of the issues facing residents of The Dalles and its existing and proposed mechanisms and plans to address those issues, we believe the designation of the local studio outside the community will materially aid OPB's operations without reducing the quality of local service and would be consistent with the operation of the station in the public interest.