

Request for Main Studio Rule Waiver
WFUM(TV), Flint, Michigan (FIN: 69273)

Central Michigan University (CMU) hereby requests a waiver of Section 73.1125(a) of the Commission's rules (main studio rule), concurrent with grant of the instant application, pursuant to the good cause exception contained in Section 73.1125(b)(2) of that rule. CMU believes that operation of WFUM(TV) from a main studio located at CMU's central production facility at the University's main campus in Mount Pleasant, Michigan would serve the public interest by allowing CMU to fulfill its mission to provide service to as wide an audience as possible while recognizing the realities of the financial situation facing state universities and public broadcasters.

CMU is a public university founded in 1892 in Mount Pleasant, Michigan. For more than 30 years, CMU Public Broadcasting has provided television and radio programming and other outreach activities to residents on central and northern Michigan. CMU is the licensee of four full power noncommercial educational television stations in the State of Michigan: WCMU-TV, Mount Pleasant; WCML(TV), Alpena; WCMV(TV), Cadillac; and WCMW(TV), Manistee. All four stations are programmed and controlled from the main studios located at CMU's main campus in Mount Pleasant, providing CMU with substantial experience in operating stations as satellites while continuing to respond to the needs of those stations' communities of license. CMU also is the licensee of the noncommercial educational FM stations which are listed in Exhibit 14 to this application. CMU seeks a waiver of the main studio rule in order to operate WFUM(TV) as a satellite of WCMU-TV, Mount Pleasant, Michigan and a member station of CMU Public Television. To the extent necessary, CMU also seeks waiver of Section 73.3527 of the Commission's Rules to permit location of the station's public inspection file at the main Mount Pleasant studio. Waiver of the main studio rule to allow operation of WFUM(TV) as part of CMU Public Broadcasting is necessary to preserve public broadcasting on the station, as the current licensee announced in 2009 that declines in member support and revenue shortfalls could not support independent operation in Flint and that it would therefore cease operating the station.

In the past, the Commission has allowed noncommercial educational broadcast licenses to operate as satellite stations. *See generally Nebraska Educational Television Commission*, 4 RR 2d 771 (1965). In doing so, the Commission has recognized that the substantial cost savings realized from not being required to construct an additional main studio often are used by stations to provide an expanded amount of public affairs programming, which serves the public interest. *See Amendment of Section 73.1125 and 73.1130 of the Commission's Rules*, 3 FCC Rcd 5024, 5027 (1988). Waivers generally have been granted where the licensee has demonstrated that the local community will be adequately served, and the satellite station has satisfied the local/toll-free telephone requirement. *Id.* at 5027.

In this case, CMU will fulfill its local service obligations despite the absence of a main studio. As part of its core educational mission, CMU currently operates an Off-Campus Program center in Flint, connecting the University to that community. CMU operates a toll-free telephone number (800-727-9268) at which Flint residents can contact WCMU-TV's primary Mount Pleasant studios. CMU also operates a website for CMU Public Broadcasting (www.wcmu.org) through which viewers can access extensive information about the stations and submit comments and questions via e-mail. CMU will be involved in the Flint community through expansion of the existing programs it uses to work with local arts and service organizations throughout the state. CMU partners with schools and local groups to provide early childhood literacy training through its Ready to Learn program, helps teach young mothers to prepare healthy meals through its Healthy Weight for Preschoolers program, and provides programming and community outreach to help members of its communities care for elderly parents and those with Alzheimer's disease. CMU operates a mobile satellite studio which will travel to Flint. CMU personnel will contact local community leaders frequently to ascertain community interests and recommendations for programs designed to address them.

The local needs of Flint are already being addressed by many of CMU's television programs, including local programs and CMU's PBS program offerings. CMU's locally produced programming includes Quiz Central, an academic quiz show featuring students from Michigan high schools; Destination Michigan, a series of special films celebrating the people and places of Michigan from independent producers around the state as well as from CMU's staff producers; Capitol Report, a weekly half-hour discussion with state and federal legislators about current government and political issues; and Ask the Specialists, which features local doctors, lawyers, CPAs, and experts in a number of other fields providing viewers with professional advice and responding to e-mailed questions from viewers. CMU plans to expand these programs to cover additional issues important to Flint viewers and to include additional participants from the Flint area. In addition to this locally-produced programming, CMU will continue to provide Flint viewers with access to PBS programming.

CMU is committed to providing high quality educational programming to citizens in the Flint area and throughout Michigan. Due to the limited financial resources available locally and nationally for noncommercial educational television stations, however, CMU respectfully submits that a waiver of the main studio rule is necessary to allow WFUM(TV) to continue to provide educational programming serving the needs of the Flint community.