

Exhibit 6: Request for Waiver of Main Studio Rule

Concurrent with its FCC Form 302 license application, GBH Telecommunications Inc. (“GBH”), permittee of WZAI-FM (Brewster, MA), hereby requests waiver of the FCC’s main studio rule.¹ Such waiver will allow WZAI-FM, which will operate as a noncommercial educational (“NCE”) station, to broadcast the Cape Cod & Islands local public radio service currently operated on stations WNAN-FM (Nantucket, MA) and WCAI-FM (Woods Hole, MA) from that service’s existing studio in nearby Woods Hole, MA. That service is operated by GBH’s not-for-profit parent, WGBH Educational Foundation, which is licensee of WNAN-FM and WCAI-FM. As described below, “good cause” exists for, and the public interest would be served by, grant of the requested waiver.²

First, and perhaps most notably, operation from the Woods Hole site will not diminish GBH’s ability to discern and respond to the needs and interests of WZAI’s community of license. Although the Woods Hole site is only 34.4 miles from Brewster (or 9.4 miles beyond the 25-mile radius allowed by the main studio rule),³ GBH will undertake regular initiatives in Brewster to foster a continuing dialogue between the station and its community, thereby serving the public interest. For example:

- At least twice a year, GBH will organize and publicize a public meeting in Brewster at which station representatives will (i) report on how WZAI-FM has served the Brewster community and (ii) solicit feedback from attendees on WZAI-FM’s performance and responsiveness to the community. Information gathered in these meetings will enable the Cape Cod & Islands public radio service of which WZAI is a part to provide programming specifically addressing the needs and interests of Brewster.
- In addition to holding the above-described meetings, GBH will send a representative to the Brewster annual Town Meeting and will maintain contacts with community leaders. The Town Meeting is a democratic form of government dating back to colonial times at which issues of importance to the community are voted on directly by the townspeople.
- The Cape Cod & Islands public radio service of which WZAI is a part will include Brewster in its extensive cultural events coverage.

¹ 47 C.F.R. § 73.1125.

² *Id.* § 73.1125(b)(2) (allowing the Bureau to waive the main studio rule if “good cause exists ... and when doing so would be consistent with the operation of the station in the public interest.”).

³ The attached map prepared by Cavell, Mertz & Davis, Inc. depicts the proximity of Brewster to the main studio in Woods Hole. *See infra*, Figure 1.

- GBH will maintain a toll-free telephone line between Brewster and WZAI-FM by which residents can contact station management. This number will be publicized on the air and elsewhere.

Second, because WZAI-FM will operate in essence as a “satellite” of the Cape Cod & Islands local public radio service originating from Woods Hole, Commission precedent supports grant of the waiver request. As the Commission has recognized, centralized operations are beneficial for NCE stations, given their limited funding, and thus “good cause” exists to waive the main studio rule where satellite operations are proposed.⁴

Third, very shortly after filing this FCC Form 302 license application, GBH will file an FCC Form 316 seeking authorization to assign the WZAI-FM construction permit to its not-for-profit parent, WGBH Educational Foundation. Once that request is approved, WGBH Educational Foundation will amend this FCC Form 302 license application to attach a completed Section II of FCC Form 340 (i) designating WZAI-FM as a noncommercial facility and (ii) demonstrating the qualifications of WGBH Educational Foundation to operate WZAI-FM as a noncommercial station.

Finally, as required by the Commission’s rules,⁵ GBH will keep the Station’s public inspection file at the main studio in Woods Hole, and will make all reasonable accommodations for listeners wishing to examine the file’s contents.

⁴ See, e.g., *Application of Pataphysical Broadcasting Foundation, San Ardo, California*, 13 FCC Rcd. 1248, 1249 (MMB 1997).

⁵ See 47 C.F.R. 73.3527.

