

REQUEST FOR WAIVER OF SECTION 73.1125

CSN International (“CSN”) hereby respectfully requests a waiver of the requirements of Section 73.1125 of the Commission’s rules so that the main studio of its Station WREQ(FM), Ridgebury, Pennsylvania, may be co-located with that of CSN’s co-owned Station WBJA(FM), Albion, New York. Station WREQ(FM) would then be operated as a satellite FM station, rebroadcasting the programming aired by Station WBJA(FM). Ridgebury, Pennsylvania is approximately 135 road miles from Albion, New York. In connection with this request, CSN also is applying to license Station WREQ(FM) and WBJA(FM) as noncommercial educational FM stations.

CSN is a not-for-profit corporation that is tax-exempt pursuant to Section 501(c)(3) of the Internal Revenue Code. A full description of its educational purpose and activities, and examples of the educational programming it will offer on the stations, are set forth in Exhibits A and C of this application. The Commission previously has found CSN qualified to own and operate noncommercial educational FM stations KRSS(FM), Tarkio, Missouri; KBLD(FM), Kennewick, Washington; WQKO(FM), Howe, Indiana; KTBJ(FM), Festus, Missouri; WCVN(FM), Bronson, Michigan; KSGR(FM), Portland, Texas; KLWD(FM), Gillette, Wyoming; KDKR(FM), Decatur, Texas; WXJC(FM), Wilson, North Carolina; KHJC(FM), Lihue, Hawaii; WJWD(FM), Marshall, Wisconsin; WHLP(FM), Hanna, Indiana; KIHS(FM), Adel, Iowa; KLEU(FM), Lewistown, Montana; WJIJ(FM), Norlina, North Carolina; WPGT(FM), Roanoke Rapids, North Carolina; WAVQ(FM), Pontiac, Illinois; and WPVA(FM), Waynesboro, Pennsylvania.

As the Commission is aware, licensees of noncommercial educational stations such as CSN are able to realize significant economies of scale when they are authorized to centralize the operations of two or more stations in a state or regional network and without having to construct a main studio for each facility. Although its station in Ridgebury would be operated as a satellite of Station WBJA(FM), CSN will ensure that it meets its local service obligation and satisfies the public interest standard underlying Section 73.1125 of the rules by ascertaining the problems, needs and interests of the local community and addressing these issues through its programming on its Albion station.

In order to meet its objectives in this regard, CSN will appoint a local public affairs representative in Ridgebury who will keep WBJA(FM)’s management abreast of local issues of interest and concern to the residents of Ridgebury on a regular basis. This local representative will also serve as a liaison between the residents of Ridgebury and station management. The station will periodically air announcements inviting residents of the community to contact its local representative/liaison to discuss both the community’s needs and station programming responsive to local community needs. CSN also will maintain a local public inspection file in Ridgebury and a toll-free telephone number for residents in Ridgebury who wish to reach the WBJA(FM) studios. Local news programming and public service announcements will include portions regarding events in Ridgebury, and programs addressing the issues ascertained by WBJA(FM)’s management will be broadcast.