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May 28, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW,
Washington, DC 20554

Re: NCE-FM Main Studio Waiver
BPED-19980213MA
Facility ID # 90113

Dear Ms. Dortch;

Houston Christian Broadcasters, Inc. ("HCBI") hereby respectfully requests a waiver of the requirements of Section 73.1125 of the Commission's rules¹ to allow for the operation of its proposed noncommercial, educational FM station, at Fredericksburg, Texas, as a satellite station of co-owned noncommercial station KHCB-FM, Houston, Texas, and with its main studio located outside the principal grade contour of the proposed station. In support of this request, the following is submitted for the consideration of the Commission and its Audio Division.

HCBI is a non-profit, educational licensee located in Houston, Texas, and is the Commission licensee of a group of noncommercial broadcast stations and FM translators, including KHCB-FM. The Commission has granted satellite operation waivers for other

¹ 47 C.F.R. 1125.

HCBI stations located in Texas and Louisiana to allow their main studios to be located at the KHCB-FM studio. Cf. KHCL, Arcadia, Louisiana, and KHKV, Kerrville, Texas.

HCBI's request is based on the economies of scale that would be realized by a grant of the waiver. The Commission has been concerned in connection with other main studio waivers that a licensee takes adequate measures to maintain awareness of the satellite station's community needs and interests. To that end, HCBI pledges to: (1) routinely contact Fredericksburg community leaders on a quarterly basis to ascertain the needs and interests of Fredericksburg and provide programming specifically addressing those needs and interests; (2) maintain an Internet site whereby Fredericksburg residents can communicate directly with the licensee concerning programming and station operation; (3) maintain a toll-free telephone line between Fredericksburg and KHCB-FM by which residents can contact HCBI management; and (4) maintain the proposed station's public file in Fredericksburg.

In these circumstances, the Commission has been persuaded in the past that a licensee will meet its local service obligations and thus, has granted similar requests for a main studio waiver as consistent with the public interest.² See, *Delmarva Broadcasting Corporation MO&O*, FCC 04-90, released April 14, 2004.

Based on the foregoing, Houston Christian Broadcasters, Inc. hereby respectfully

² HCBI is aware of the requirement that it maintain a public file for the Fredericksburg station at the main studio of parent station KHCB-FM. HCBI will also make reasonable accommodations for listeners wishing to examine the file's contents. See *Main Studio Reconsideration Order*, 14 FCC Rcd at 11129 (1999). HCBI is also aware that, notwithstanding grant of the waiver requested here, the public file for the Fredericksburg station must contain the quarterly issues and programs list required by 47 C.F.R. § 73.3527(e)(8).

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Respectfully submitted,

Houston Christian Broadcasters, Inc.

By

Jeffrey D. Southmayd

Its Attorney

cc: Audio Division