

**Request for Waiver of Section 73.1125**  
**Main Studio Requirements**

The above-referenced application seeks authority for Public Broadcasting of Colorado, Inc. ("Colorado Public Radio" or "CPR") to acquire Station KRKY-FM, Fort Collins, Colorado. CPR intends to operate the Station as a satellite of co-owned noncommercial FM Station KVOQ-FM, Greenwood Village, Colorado (which is a part of the Denver metropolitan area). CPR accordingly requests a waiver of the main studio requirements of Section 73.1125 of the Rules.

Upon completion of this transaction, KRKY-FM will re-broadcast KVOQ-FM's Open Air programming. Fort Collins is approximately 65 miles from Denver where KVOQ-FM and its studio and personnel are located. Grant of the requested waiver will enable CPR to achieve significant economies in terms of capital investment, staffing, and general operating costs.

Open Air will be a vital part of our service to the Fort Collins community, providing a destination to discover Colorado musicians and to connect with a thriving local music scene. This programming depends on maintaining a close, on-going dialogue with, and responsiveness to, community needs and interests. These connections help us tell broader stories on issues of importance to the community – in-depth stories about major cultural and arts organizations, reviews and interviews, the business and economics of the arts, the impact on our listeners, and connections to issues such as education and state government. The stories are told on air and online across all of CPR's program services including its news and public affairs.

CPR will maintain a toll-free telephone number in Fort Collins to facilitate access to its studios in Denver, as well as a robust web site with immediate access to the programming and community response mechanisms.

The Commission has long recognized the benefits of centralized operations for non-commercial educational stations given their limited funding, and has found good cause to waive the main studio location requirement where satellite operations are proposed. See, e.g., *Delmarva Educational Ass'n*, FCC 04-90, 19 FCC Rcd 6793 para. 11 (2004) (waiver granted where applicant proposed to routinely contact community leaders and provide programming responsive to needs and interests; maintain an Internet site whereby community residents can communicate directly with the licensee concerning programming and station operation; maintain a toll-free telephone line; and maintain the proposed station's public file in community).

In this case, CPR will realize significant benefits from operation of KRKY-FM on a centralized basis. Moreover, it is clear that CPR will maintain close access and responsiveness to listeners in the Fort Collins area. Consistent with main studio waivers previously granted CPR (e.g. KPYR, Craig, CO. (BLED-20051021ACN)), good cause accordingly exists for waiving the

Rule effective upon a grant of the KRKY-FM assignment application and consummation of the transaction.