

## **REQUEST FOR MAIN STUDIO RULE WAIVER**

Bible Broadcasting Network, Inc. ("BBN"), hereby respectfully requests that the Commission grant a waiver of Section 73.1125(a) of the Commission's rules to permit BBN to operate WYFO(FM), Lakeland, Florida, as a "satellite" of BBN's station WYFQ (AM), Charlotte, North Carolina (Facility ID No. 5152). Good cause for a waiver exists. **WYFO already has a main studio waiver ( -20000208ABD), granted February 27, 2002, specifying WYFB(FM), Gainesville, Florida, as the primary station, but BBN seeks to change the primary station to WYFQ(AM). In an application for modification of license (File No. BMLED-20000606ACG), granted November 13, 2000, the Commission granted a main studio waiver to specify WYFB as a satellite of WYFQ, so this request simply removes WYFB as the intermediate station and updates the Commission's records.** In support of its request, it is stated as follows:

BBN is a non-profit corporation organized under Section 501(c) of the Internal Revenue Code. BBN is the licensee of Station WYFO and WYFQ as well as 39 other noncommercial educational stations and numerous FM translator stations. BBN seeks a waiver of the main studio rule in order to operate WYFO as a satellite of Station WYFQ(AM) and to carry BBN's programming. WYFQ has a full staff and otherwise can serve as the main studio for WYFO.

Public funding is not available for private non-profit broadcast organizations such as BBN. BBN respectfully submits that due to the limited financial resources available to support WYFO and the unavailability of public funding, a waiver of the main studio rule will be serve the public interest in this instance.

WYFO already has full capability to provide local programming. BBN does not seek to change that by this request for waiver. Thus, this request relates to the staffing requirement of Section 73.1125(a). See, *Jones Eastern of the Outer Banks*, 6 FCC Rcd. 3615 (1990). In requesting this waiver, BBN intends to meet its local service obligation in the following manner:

BBN has a Community Advisory Board with at least one member from Lakeland. That member will, at least quarterly, ascertain the needs and interests of WYFO's listening audience.

BBN will maintain its public file in Charlotte, NC, and will maintain a local toll free number for the benefit of Lakeland residents.

Grant of this waiver request will, by reducing operating expenses, enable BBN to improve its overall program production. Therefore based on the above commitments, Bible Broadcasting Network, Inc., respectfully requests Commission consent to operate WYFO(FM), Lakeland, Florida, as a satellite of WYFQ(AM), Charlotte, North Carolina.<sup>1</sup>

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<sup>1</sup> A waiver of Section 73.1125 was granted October 22, 2013, to BBN on similar facts that permit KYFI(AM), St. Louis, Missouri, to operate as a satellite of Station WYFQ(AM), Charlotte, NC (See File No. BML-20130725AFO). A waiver of Section 73.1125 was granted October 19, 2010, to permit Station WYBK(FM), Chattanooga, Tennessee, to operate as a satellite of Station WYFQ(AM). A waiver of Section 73.1125 was granted June 25, 2012, to permit Station WYBP(FM), Fort Lauderdale, Florida; WYBX(FM), Key West, Florida; and WYBW(FM), Key Colony Beach, Florida, to operate as satellites of Station WYFQ(AM).