

FCC Form 302-FM
Radio Station WRRS(NCE-FM), Channel 203A,
Middleborough Center, Massachusetts, FCC Facility ID No. 177016
Application for a License to Cover
Construction Permit BPED-20170808AAQ
Attachment 1 to Exhibit 6
December 2017

STATEMENT RE COMPLIANCE WITH THE MAIN-STUDIO AND PUBLIC-FILE RULES

Construction Permit BPED-20170808AAQ authorizes a relocation of the main=transmitter site of station WRRS (the *Station*), a noncommercial educational FM radio station which serves the community of Middleborough Center, Massachusetts.

The Station's main studio is located at 130 Enterprise Drive in Marshfield, Massachusetts 02050-2110. The NAD 1927 geographic coordinates of that location are:

North Latitude 42° 06' 10"; West Longitude 70° 44' 54".

The United States Census Bureau's NAD 1927 geographic coordinates of record for the Census Designated Place known as Middleborough Center, Massachusetts (the Station's community of license) are:

North Latitude 41° 53' 38"; West Longitude 70° 55' 11".

The distance from the main studio to the geographic coordinates of record for the community of license is 16.9 miles.

Section 73.1125(a)(3) of the Commission's Rules states:

Section 73.1125 Station main studio location.

(a) [E]ach AM, FM, and TV broadcast station shall maintain a main studio at one of the following locations:

(3) Within twenty-five miles from the reference coordinates of the center of its community of license as described in § 73.208(a)(1).

The Station's main-studio location thus complies with the requirements of § 73.1125(a)(3).

The Station's main studio has full-time managerial and staff presence during normal business hours, weekdays. Also, the licensee maintains the Station's local public inspection file at the main studio.

Residents of Middleborough Center can access the main studio via telephone, without having to incur toll charges, using either the telephone number 1.781.834.4400 or the telephone number 1.800.696.9505. The public can also communicate with the licensee via web mail: <http://ticnetwork.org/about-us/contact-us/>.

Please note:

By means of the Memorandum Opinion and Order in MB Docket No. 14-127, 31 FCC Rcd 526 (2016), the Commission required that each Noncommercial Broadcast Radio licensee shift the contents of the public inspection file that the licensee maintains pursuant to § 73.3527 of the Commission's Rules from a local public inspection file at its station's main studio to an on-line public inspection file hosted by the Commission.

Pursuant to the Commission's Public Notice, 31 FCC Rcd 4699 (rel. May 12, 2016), by March 1, 2018, all Noncommercial Educational Stations must complete the above-described transition by March 1, 2018.

The Station has not yet begun that transition, but intends to complete it by the deadline.

Please also note:

By means of the Report and Order in MB Docket No. 17-106, 32 FCC Rcd 8158 (2017) (the Report and Order), the Commission eliminated the main studio rule. Thereby, the Commission also eliminated provisions which required that the main studio have full-time management and staff present during normal business hours, and that a station have program-origination capability.

Also by means of Report and Order, the Commission retained the existing requirement that a broadcaster maintain a local or toll-free telephone number for use by the residents of its station's community of license. The FCC also required that each station will have to maintain at a publicly accessible location within the station's community of license any portion of its local public inspection file that is not part of the on-line public file.

On December 8, 2017, a summary of the Report and Order in MB Docket No. 17-106 appeared in the Federal Register at 82 Fed. Reg. 57876 et seq. Thus, both the elimination of the main-studio rule and the other rule changes that the Report and Order in MB Docket No. 17-106 has promulgated will become effective on January 7, 2018.

Since the time that the Station first went on the air, the licensee has maintained a fully functional and staffed main studio as described on the previous page, and has maintained the Station's local public inspection file at the Station's main studio. As noted above, as of January 8, 2018, the licensee will no longer have to maintain a main studio for the Station.

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Given the typical processing time for license-applications such as this one, and particularly those filed near the end of a calendar year, it is likely that the main-studio rule will no longer be on the books during a portion of the pendency of this application.

As noted above, the applicant is currently in compliance with the main-studio rule, and has so certified in response to Question 5 of Section III - Engineering of the parent FCC Form 340. The applicant intends to make no changes in its operations, but reserves the right to do so, consistent with the Commission's changed requirements, after they take effect.

In Para. 26 of the Report and Order in MB Docket No. 17-106, the Commission stated:

[I]f a broadcast station currently maintains its local public file at a main studio that complies with the current main studio rule but is not within the station's community of license, and if the station retains that studio, we will grandfather that studio as a permissible location for the station's local public file for the period before completion of the station's transition to the online public file. [...]

[Footnote omitted.] Pursuant thereto, during the transition period, the applicant intends to maintain in the local public-inspection file contents at the main-studio location specified above. After the transition period, if there are any items that the licensee must maintain but that are not part of the on-line public file, the licensee will establish a suitable repository at a place to be determined within the Station's community of license.