

EXHIBIT 6
Modification of Main Studio Waiver/Satellite Status

The State of Wisconsin-Educational Communications Board (“ECB”), permittee of noncommercial educational (“NCE”) radio station WHSF(FM), Rhinelander, Wisconsin, in connection with the station’s original license to cover application, respectfully requests a modification of WHSF’s main studio waiver grant in order to specify a different hub station. In the original construction permit grant for WHSF in FCC File No. BNPED-20071018AWS (as modified by BMPED-20110407ABP), the Commission granted a waiver of the main studio requirement of Section 73.1125 of the FCC’s Rules to allow ECB to operate WHSF as a satellite of station WERN(FM), Madison, Wisconsin. ECB now seeks modification of the waiver grant to specify WHSF’s operation as a satellite of a different Wisconsin Public Radio station – **WHA(AM), Madison, Wisconsin (Facility ID 6139)** – from the same Madison main studio location.

ECB is a state governmental entity and the licensee or permittee of nineteen (19) noncommercial educational radio stations. ECB is also partner to the University of Wisconsin System (“UWS”) in connection with the creation and operation of Wisconsin Public Radio (“WPR”). As explained in the original main studio waiver request for WHSF, WPR offers two separate and distinct program services: The Ideas Network and The NPR News & Classical Music Network. Stations WERN(FM) and WHA(AM), both licensed to Madison, Wisconsin, serve as the “hub” stations for the dual WPR networks. Station WERN is the point of program origination for the NPR News and Classical Music Network, while WHA is the point of origination for the Ideas Network. Stations WERN and WHA utilize a common program origination/studio point at Vilas Hall on the UWS campus in Madison. The other stations forming the WPR network rebroadcast the programming of the hub stations.

ECB proposes to maintain the existing authorization for the satellite operation of WHSF from the Madison main studio, per the station’s granted main studio waiver, except that the originating/hub station of record will be changed from WERN to WHA. Given that both WERN and WHA are operated from the main studio location in Madison, there will be no change in the WHSF main studio location. The only change is with respect to the parent station and programming rebroadcast by WHSF.

Despite this change in parent station, ECB reaffirms the representations and justifications underlying WHSF’s existing main studio waiver grant. It remains the case that a stand-alone operation in Rhinelander could not offer the quality and quantity of program offerings that WHSF will be able to bring to its community as a satellite station that can take advantage of the economies of scale allowed by use of the consolidated Madison main studio. Moreover, ECB and WPR will still operate WHSF as part of an integrated statewide educational broadcasting system designed to provide Wisconsin residents with unique noncommercial broadcasting at a cost which can be supported by the station’s licensee (a state governmental entity). In addition, ECB and WHSF will still work to routinely ascertain community needs and issues of concern in Rhinelander, and to address such interests through WHSF’s programming.

Accordingly, WHSF's satellite operation will promote the public interest, notwithstanding the change in originating station, by allowing ECB to serve the needs of the smaller Rhinelander community by taking advantage of all of the programming resources of its multi-station, statewide noncommercial radio network headquartered in the more populous state capital of Madison. As a result, it remains the case that this mode of operation will allow ECB to provide the highest quality and variety of public radio offerings to the Rhinelander community consistent with the realities of funding for public broadcasting. The Commission has stated that "[w]e have recognized the benefits of centralized operations for noncommercial educational stations, given the limited funding available to these stations, and we have granted waivers to state and regional public television and radio networks to operate 'satellite' stations that do not necessarily meet the requirements of a main studio," subject to a showing of good cause. *In re Main Studio and Program Origination Rules for Radio and Television and Television Broadcast Stations*, Memorandum Opinion and Order, 3 FCC Rcd 5024 (1988).

ECB therefore respectfully requests a modification to WHSF's grant of a waiver of Section 73.1125 of the Commission's rules, to specify its operation as a satellite of co-licensed station WHA(AM), Madison, Wisconsin.