

Request for Waiver of Main Studio Rule

The Power Foundation ("TPF") in accordance with the provisions of *Section 73.1125* of the Commission's Rules requests authority to *waive* the Main Studio Location requirements for a WWDL (FM), Plainfield, Indiana (Facility ID# 91476) ("Station") in order to operate the Station, as a "satellite" station of its non-commercial educational ("NCE") station, WHQA (FM), Honea Path, South Carolina (Facility ID# 21830).

Specifically, TPF is operating the above-referenced station as part of The Power Foundation's "Life FM" radio network originating from WHQA's main studio location in Piedmont, South Carolina¹. TPF is a *Section 501(c)(3)* non-profit corporation and operates non-commercial programming on the network. Program material shall be fed to the station from the parent station WHQA (FM). As a listener supported network, the requirement to staff each station places a severe financial constraint on the operation of the facility. This constraint reduces the funding available for the network programming efforts. TPF therefore desires to eliminate the local main studio.

For purposes of clarity, the "control point" shall be the main studios of WHQA (FM) (*i.e.* the "Network").

I. Compliance with Community Service Obligations.

With respect to the community of Plainfield, Indiana, TPF proposes a three point approach.

1. TPF will visit numerous organizations and community groups to ascertain the needs of each listening audience. Two individuals have been appointed in that capacity. They are:

Pastor Morris Mott
849 West Beech Dr
Plainfield IN 46168
317-432-1247
pastormorris@christchurchtoday.org

Mike Corcoran
1369 Clara Court
Plainfield, IN 46168
317-538-5712
nighthawk@indy.rr.com

2. TPF also has established a "local call-in/in person program listener

¹ It must be noted that TPF has been routinely granted waivers in the past proposing the same operations, See e.g., WEGN (FM), Kankakee, IL, WSWs (FM), Smithboro, IL and WWQK (FM), Oak Ridge, TN.

program" line. TPF's "toll-free" phone number is: 1-877-700-8047.

3. TPF also has a full service website established whereby listeners' can contact the organization. The Website is: www.thelifefm.com.

II. Compliance with Broadcast Operations.

In addition to community service obligation, TPF recognizes that it must conduct its broadcast operations in full compliance with the Rules. In order to do so as a satellite station, TPF shall:

1. TPF shall comply with the EAS Rules. TPF will have the capability from the control point to command the local EAS unit to perform the required weekly/monthly tests. The local unit will have the capability of monitoring the local primary/secondary stations as well as NOAA for local alerts. Local alerts will initiate an alarm function back to the control point for logging purposes. Additionally, the local unit will store a printout which can then be verified on the routine monthly maintenance visits.

2. TPF shall have an automatic system in place to monitor the parameters of the transmitters and, in the event of an out of tolerance condition, notify the control point and other designated personnel (multiple notifications) of such condition. The control point or other designated personnel will have full capability to turn off the transmitter immediately until corrections can be made. Tower lighting status is included in this monitoring.

3. Monitoring procedures will be in place to maintain compliance with this Section 73.7350(c)(1).

4. TPF shall also establish a schedule to maintain the required calibrations. A maintenance visit will be performed approximately monthly to verify proper operations and to check the local readings against the reported "remote" readings.

5. TPF shall have a local EAS decoder and is monitoring the required local stations for relay of emergency messages.

6. TPF will have its public file in the community area. That location is 7702 Indian Lake Road, Indianapolis, Indiana 46236.

7. TPF has a contract engineer and other personnel as necessary to be "on call" and to receive telephone alerts that the transmitter requires attention. Additionally, TPF's community liaisons (names listed above) will monitor the Station on a daily basis and will report any abnormal condition to the control point.

8. TPF certifies that a "toll-free" number is in existence to meet the requirements of Section 73.1125(e). TPF's phone number is: 1-877-700-8047.

In addressing non-commercial waiver requests, the Commission has on many occasions found "good cause" to grant such waivers where the requestor has shown centralized operations are an economic factor in the operation of non-commercial entities, providing the requestor has met the obligations required by the Commission's Rules. See *Lift Him Up Outreach Ministries, Inc.*, 3 FCC Rcd 5571 (HDO, 1988); *Sound of Life, Inc.*, 4 FCC 8273 (HDO, 1989); *Board of Visitors of James Madison University*, 8 FCC Rcd 1751 (HDO, 1993); and *Letter to Roy R. Russo, Esq.*, dated January 24, 1994, as well as numerous others.

As TPF is concerned that quality programming is available to a wide audience within the financial operational constraints of the network and it feels that the "public good" is being addressed, it is therefore respectfully requested that the Commission Grant this request for Waiver of the Main Studio Rules along with the proposed FCC Form 340 Construction Permit Application.