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January 10, 2007

FILED/ACCEPTED
JAN 10 2007
Federal Communications Commission
Office of the Secretary

VIA HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street
Room TW-A325
Washington, DC 20554

Re: Supplement to Main Studio Relocation and Request for Main Studio Waiver
WLKB(FM), Bay City, Michigan (FIN: 5064)

Dear Ms. Dortch:

On behalf of Educational Media Foundation ("EMF"), the licensee of FM radio station WLKB, Bay City, Michigan, this is a supplement to the request filed on September 12, 2006 for a waiver of Section 73.1125 of the Commission's rules to permit the relocation of the main studio of WLKB from its current location in Yucaipa, California to the main studio of EMF's co-owned station KLVR(NCE-FM), Santa Rosa, California. See FCC File No. -20060912AEX. A receipt stamped copy of the request is attached hereto. This supplement is being submitted to correct and clarify the station details in the aforementioned request.

Since filing the main studio relocation and waiver request, the call sign of the station was changed from "WTRK" to "WLKB." Therefore, all references to FM station WTRK, Bay City, Michigan should now be processed as WLKB, Bay City, Michigan and EMF hereby respectfully renews its request.

Should there be any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

Karen A. Ross

Enclosure
cc: Dale Bickel - FCC

LAWYERS RECEIPT COPY

DWT

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September 12, 2006

RECEIVED
SEP 12 2006
Federal Communications Commission
Office of Secretary

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth St., S.W., TW-A325
Washington, DC 20554

Re: Main Studio Relocation and Request for Main Studio Waiver
WTRK(FM), Bay City, Michigan (FIN: 5064)

Dear Ms. Dortch:

On behalf of Educational Media Foundation ("EMF"), the licensee of noncommercial, educational FM station WTRK(FM) in Bay City, Michigan, we hereby respectfully request a waiver of Section 73.1125 of the Commission's rules (hereinafter referred to as the "main studio rule") to permit the relocation of the main studio of the WTRK from its current location in Yucaipa, California to the main studio of EMF's co-owned station KLVR(NCE-FM), Santa Rosa, California. The proposed studio location is approximately 3,284 kilometers (2,041 miles) outside of the 3.16 mV/m contour of WTRK.

On September 7, 2006, Commission staff granted EMF's initial waiver request,[1] authorizing EMF to operate WTRK as a satellite of EMF's co-owned noncommercial, educational FM station KLRD(FM), Yucaipa, California. EMF now proposes to operate WTRK as a "satellite" station of its co-owned station KLVR in Santa Rosa, California.

WTRK will become part of a network of radio broadcast stations operated by EMF known as the "K-LOVE Radio Network." EMF is a non-profit corporation and each network station operates noncommercially and broadcasts the noncommercial educational programming carried on the K-LOVE Radio Network. By co-locating WTRK's main studio at KLVR's main studio in Santa Rosa, EMF will continue to realize valuable economies of scale and cost savings,

[1] See File No. BMPED-20060714ACD.

which are needed to maintain the high quality of K-LOVE's noncommercial educational programming. As a listener-supported station, WTRK will face severe financial constraints. The obligation to maintain separate staffing and studio locations for both WTRK and KLVR will place a serious financial burden on EMF and divert what limited resources are available from K-LOVE's programming efforts.

To ensure that WTRK fulfills its local service obligations to the residents of Bay City, Michigan, EMF will continue to maintain an auxiliary studio either: 1) in Bay City; 2) at a location within the principal community contour of an AM, FM, or TV station licensed to Bay City; or 3) within twenty-five miles from the reference coordinates of the center of Bay City. As EMF represented in its initial request, this auxiliary studio will be capable of originating local programming that is responsive to local community needs.

In addition to maintaining an auxiliary studio, EMF will also have a local public affairs representative, who may be a volunteer, available in the community of Bay City, Michigan. This local representative will, at least on a quarterly basis, conduct interviews and surveys of local community leaders and other residents to ascertain the interests, concerns, and needs of the Bay City listeners. EMF will then address the recurrent issues, problems, and needs of the residents of Bay City in K-LOVE's news and public affairs programming.

EMF's local representative will further serve as a liaison between the residents of Bay City and EMF's programming personnel. EMF will continue to maintain a toll-free telephone number, as required by Section 73.1125(d) of the rules. Finally, EMF will maintain its public inspection file for WTRK at the main studio of its parent station, KLVR(FM), Santa Rosa, California, as required by Section 73.3527 of the Commission's rules, and make reasonable accommodation to listeners wishing to examine the file's contents.

Under Section 73.1125 of the Commission's rules, a broadcast station must maintain its main studio (a) within the station's community of license; (b) at a location within the principal community contour of any AM, FM, or TV broadcast station licensed to the station's community of license; or (c) within 25 miles from the reference coordinates of the center of the station's community of license, except when "good cause" exists for locating the main studio at an alternate location. The Commission traditionally considers waiver requests by noncommercial educational stations on a case-by-case basis. See Main Studio and Program Origination Rules, 3 FCC Rcd 5024 (1988); see also Review of the Commission's Rules Regarding the Main Studio and Local Public Inspection Files of Broadcast Television and Radio Stations, 13 FCC Rcd 15691, 15695 n.18 (1998). In the context of noncommercial waiver requests, the Commission has expressly and implicitly found "good cause" to exist in numerous instances based solely upon a showing that centralized operations will provide an economic benefit to noncommercial stations which have limited funding, provided that local service obligations are met. See Letter to Roy R. Russo, Esq., dated January 24, 1994; Letter to Richard J. Bodorff, dated January 2, 1992; The President and Board of Trustees of the Miami University, 7 FCC Rcd 2902 (1992);

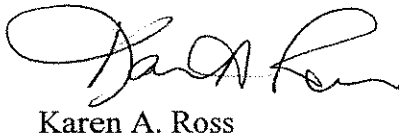
The Cedarville College, 6 FCC Rcd 538 (1991); Letter to Gerald Stevens-Kittner, Esq., dated July 15, 1991; Sound of Life, Inc., 4 FCC Rcd 8273 (1989); Lift Him Up Outreach Ministries, Inc., 3 FCC Rcd 5571 (1988); Georgia State Board of Education, 70 F.C.C.2d 948 (1979), recon. denied, 71 F.C.C.2d 227 (1979); Nebraska Educational Television Comm'n, 4 R.R.2d 771 (1965).

EMF respectfully submits that the instant request presents substantially the same showing of good cause and public interest benefits as each of these waivers noted above. In each case, the Commission staff determined that the waivers were justified on the basis of the limited funding available to the stations and the increased efficiencies resulting from co-location of studios. Like these other waiver applicants, EMF will also experience financial difficulties in maintaining separate staffing and separate facilities for its "parent" and "satellite" stations. EMF will also be fully capable of fulfilling its local service obligations in the same manner as each of these other applicants.

In view of the foregoing, EMF requests that the Commission find pursuant to Section 73.1125(b)(2) of the Commission's rules that the public interest will be served by the consolidation of WTRK's main studio with KLVR's main studio, and authorize EMF to relocate WTRK's main studio from its current location in Yucaipa, California to the main studio of KLVR in Santa Rosa, California. As EMF is a noncommercial entity there is no fee associated with this filing.

If there should be any questions regarding this matter, please contact the undersigned.

Respectfully submitted,



Karen A. Ross