**Request for Waiver**

Trinity Christian Center of Santa Ana, Inc., d/b/a Trinity Broadcasting Network (“Trinity”) hereby respectfully supplements its pending request for a waiver of the FCC’s main studio rule, 47 C.F.R. § 73.1125, to permit Trinity to continue to locate the main studio of WGTW-TV at its current location, 1810 Columbia Avenue in Folcroft, Pennsylvania, during any period in which Trinity is required by the FCC’s rules to maintain a main studio for WGTW-TV. Trinity has entered into a channel sharing agreement pursuant to which the Station will broadcast from the facilities currently licensed to WMGM-TV, Wildwood, New Jersey, and has proposed to change its community of license to Millville, New Jersey. The noise limited service contour of WMGM-TV does not reach Folcroft, Pennsylvania.

Grant of this waiver would be consistent with precedent. The Commission repeatedly has waived the main studio rule for television broadcasters licensed to communities that could not support a main studio. In making this determination, the Commission has considered, among other things, declining population in the county containing the community of license, the median income in the community of license compared to the rest of the state, and the distance between the community of license and the main studio.[[1]](#footnote-1) In this case, Millville, New Jersey, had just over 28,000 residents as of 2016, a decline since the 2010 Census.[[2]](#footnote-2) Millville is located in Cumberland County, the population of which likewise has declined since the 2010 Census.[[3]](#footnote-3) The median household income in Millville, $49,133, is just 68% of the statewide average, $72,093.[[4]](#footnote-4) And here, the WGTW-TV main studio is located less than 37 miles from Millville, far closer than the 70 and 90 mile distances approved in *Living Faith* and less than an hour’s drive*.*

Additional good cause exists for grant of this waiver request. Trinity will continue to staff its WGTW-TV main studio as required by the current rule, and the station has fully transitioned to an online public file, which the Commission recently suggested mitigates the need for a main studio.[[5]](#footnote-5) Further, allowing WGTW-TV to maintain its main studio at its current location will allow any community members desiring to visit the station’s main studio to do so at its current, familiar location. In addition, while this waiver is in effect, Trinity will maintain a telephone number local to its community of license or, in the alternative, a toll-free number.

Though the Commission has proposed to completely eliminate the main studio rule because “technological innovations have rendered a local studio unnecessary …,”[[6]](#footnote-6) Trinity does not seek relief from the rule in its entirety. Instead, Trinity asks only that it be permitted to maintain the WGTW-TV studio at its current location. For the same reasons that underlay the Commission’s proposal to eliminate the local main studio requirement as unnecessary, the Media Bureau should grant Trinity a waiver to permit it to continue to maintain WGTW’s main studio at its current location.

Finally, maintaining the Station’s current main studio location allows a continuity of service and access by the public during a time of significant change in the broadcast industry. The Spectrum Auction and the attendant channel repack it requires is a *sui generis* and disruptive occurrence. Established community and public service relationships will be upset and changed, causing public confusion as stations move to new channels and communities. Allowing WGTW-TV to maintain its historic main studio location will ease some of this confusion and the impact of the changes, and allow continuity for the public. This is a meaningful and important public service supporting waiver. Accordingly, the Media Bureau should grant Trinity a waiver of the main studio location rule to permit it to continue to maintain WGTW-TV’s main studio at its current location.

1. *See*, *e.g.*, *KAKE(TV)*, 31 FCC Rcd 354 (Med. Bur. 2016) (communities of license with median incomes below statewide average); *WFRV-TV*, 26 FCC Rcd 9236 (Med. Bur. 2011) (county containing community of license declining in population and median income below statewide average); *Living Faith Ministries, Inc.*, 21 FCC Rcd 5046 (Med. Bur. 2006) (“*Living Faith*”) (proposed main studio located 70 and 90 miles from communities of license). [↑](#footnote-ref-1)
2. *See* Bureau of the Census American FactFinder database, <http://factfinder.census.gov>. [↑](#footnote-ref-2)
3. *Id*. [↑](#footnote-ref-3)
4. *Id*. [↑](#footnote-ref-4)
5. *Elimination of Main Studio Rule*, Notice of Proposed Rulemaking, 32 FCC Rcd 4415, 4418 (2017) (“*NPRM*”) (“[I]t appears that a local main studio with staffing sufficient to accommodate visits from community members no longer will be justified once broadcasters fully transition to online public inspection files.”) As of June 29, 2017, broadcasters no longer were required to retain in their public inspection files copies of letters and e-mails from the public – the last material broadcasters were required to maintain in a physical local public file. *See* *Revisions to Public Inspection File Requirements - Broadcaster Correspondence File and Cable Principal Headend Location*, Report and Order, 32 FCC Rcd 1565 (2017); Revisions to Public Inspection File Requirements - Broadcaster Correspondence File and Cable Principal Headend Location, 82 Fed. Reg. 29438 (June 29, 2017). [↑](#footnote-ref-5)
6. *Id*. Commenters responding to the Commission’s proposal overwhelmingly supported elimination of the main studio rules. [↑](#footnote-ref-6)