

Statement of Educational Purpose and Programming

Licensee, the City of Dallas (“Licensee” or “City”), holds FCC radio station license WRR (FM), Facility ID 11451, 101.1 MHz, Dallas, TX (“WRR” or “Station”). WRR currently operates a classical music format as a commercial radio station. Pursuant to Section 73.1690(c)(9) of the FCC’s rules,¹ the City hereby files this modification application to change WRR’s facility type from commercial to noncommercial educational (“NCE”). This change is part of the City’s efforts to improve the station’s efficiency and financial position, while maintaining the classical music format that serves the Dallas and North Texas communities. As a governmental entity, the City is eligible to hold a NCE license.²

History and Background

WRR is a treasured classical radio station that provides valuable services to the people across North Texas and to the local Dallas arts ecosystem. Broadcasting from its studios in historic Fair Park, the Station currently operates at a loss as a commercial radio station under the City as an enterprise fund, with no taxpayer subsidy. Various regulations unique to a government-operated station and market conditions have posed challenges to the long-term health of the classical station. The Station has operated at a deficit for eight years in a row, with a declining fund balance in operating reserves of \$5.1 million since 2012.

In May 2022, the City entered into a management and operating agreement with North Texas Public Broadcasting, Inc. (“NTPB”), a 501(c)(3) organization and an experienced operator of multiple noncommercial educational TV and radio stations serving the Dallas and North Texas communities. Pursuant to this agreement, the City will retain the WRR license and ultimate control over the Station, including programming, personnel, and finances, consistent with FCC requirements. Under NTPB management, the Station will continue to primarily broadcast classical music and provide services to the arts community of Dallas and North Texas.

WRR is one of the few commercial stations that is currently operated by a municipality. In addition, other than WRR, there are only two other commercial classical stations in the top 50 Nielsen-rated markets. The other classical music stations use a noncommercial format. Public radio classical music stations’ listening audience has been growing, particularly in the larger markets. Licensee believes that Dallas’ unique arts and classical music tradition, coupled with positive growth trajectories for public radio classical music programming, will help create a successful and sustainable operation for this much beloved service for Dallas and North Texas.

Moreover, the Commission has previously approved the change from commercial to NCE for other stations with a classical music format.³ For example, all-classical KING-FM in Seattle, Washington converted into a NCE, listener-supported public radio operation to address the declining ad revenues for the station.⁴ As a listener-supported station, Classical KING FM 98.1

¹ 47 C.F.R. § 73.1690(c)(9).

² See 47 C.F.R. § 73.503(a); FCC Form 340, Section II, No. 2(b).

³ See, e.g., LMS File No. BMLED-20110502AEJ (granted May 2011).

⁴ See *id.*

has grown, adding new programming and two additional channels of classical music using HD Radio technology. According to KING's website, more than 15,000 members are supporters of Classical KING FM, forming the basis for a strong and financially viable operation and bringing classical music to diverse audiences in the rapidly growing Puget Sound Region.

Grant of this application will provide a similar growth opportunity for WRR, enabling it to operate as a noncommercial classical station, with a proven business model.

Educational Purposes and Programming

Licensee is a governmental entity that seeks to promote musical educational and social welfare by providing classical music, arts, and cultural programs to the City of Dallas and North Texas communities.

Licensee will operate WRR in a manner consistent with Section 73.503 of the FCC's rules.⁵ All programming on the Station will be noncommercial in nature, and Licensee will use WRR for the advancement of educational programming. WRR will provide high quality noncommercial classical music-focused programming similar to the style, content, and best practices of other top-20 market noncommercial classical music radio stations.

The overall composition of WRR programming will consist of a high-quality mix of locally hosted classical music and nationally syndicated and distributed classical music programs. Examples of national programming include programs such as From the Top, Performance Today, Sunday Baroque, Classical 24, and Symphonycast. All hours of WRR radio broadcast programming will be locally programmed and managed.

In addition, WRR will continue to provide a range of services to the arts community in North Texas. For example, WRR plans to have a team of arts, music, and culture journalists who create stories, interviews and other content about performances, artists, audiences and organizations that make up the arts ecosystem in North Texas. These journalists will produce content for the Station, websites, and relevant social media and other platforms. WRR also plans to partner with arts groups, other community organizations, and residents to create engaging events for North Texans who want to learn about, discuss and celebrate the arts.

Grant of this application will serve the public interest by enabling WRR to continue to provide musical, arts, and cultural educational programming to the City of Dallas and North Texas communities.

⁵ 47 C.F.R. § 73.503.