

Request for Waiver of Main Studio Location Rule
Assignment of WROG(FM), Chambersburg, PA

In connection with the assignment of radio station WROG(FM), Chambersburg, Pennsylvania (the “Station”), proposed assignee WITF, Inc. (“WITF”) requests a waiver of Section 73.1125 of the FCC’s Rules to allow operation of the Station as a satellite of noncommercial education station, WITF-FM, Harrisburg, Pennsylvania, with a shared main studio at WITF’s headquarters located at 4801 Lindle Road in Harrisburg, Pennsylvania.

Background

WITF, Inc. is the licensee of noncommercial radio station WITF-FM in Harrisburg, Pennsylvania, which broadcasts combined news and classical music programming. Following the assignment, WITF will apply to convert the Station to noncommercial educational license status, and plans to program the Station with an all news and talk format, utilizing those segments of WITF-FM’s programming. Use of WITF-FM’s current facilities as the Station’s main studio will allow WITF, a nonprofit organization, to conserve valuable resources while providing high-quality public radio programming that the Chambersburg community might not otherwise be able to enjoy.

WITF is a trusted, valued supplier of programs and services that both satisfy and stimulate curiosity for residents in every community in the central Pennsylvania region. WITF broadcast services reach audiences in over 17 counties in central Pennsylvania. WITF’s operations include public television station WITF-TV, public radio station WITF-FM, news networks RadioPA Networks and Public Radio Capitol News, monthly regional magazine Central PA, WITF.org, WITF Educational Services, Top Flight Media and Media Solutions. WITF’s mission is to create a shared civic and cultural life for the communities of its region, connecting residents to each other and to opportunities for lifelong learning.

Justification

Use of the existing Harrisburg facilities as the Station’s main studio will serve the public interest by allowing WITF to conserve valuable resources while providing high-quality public radio offerings to the Chambersburg community.¹ Moreover, as demonstrated below, WITF will undertake appropriate efforts in order to ascertain the needs and concerns of the Chambersburg community and to respond to those issues through its programming. The Commission has stated that “[w]e have recognized the benefits of centralized operations for noncommercial educational

¹ WITF plans to operate the Station pursuant to its granted minor change construction permit in FCC File No. BMPH-20070914ABG, which modified BMPH-20070119AGW and includes authorization for a change in community of license to Chambersburg, Pennsylvania.

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 why the Commission should grant such a waiver.²

In this case, there are significant public interest gains that will result from collocation of the studio facilities. Specifically, a waiver for satellite operation will allow WITF to conserve valuable state financial resources and eliminate the need for unnecessary duplication of equipment and personnel. Such conservation of resources is vitally important for non-profit organizations such as WITF. Furthermore, a waiver will permit WITF to provide its high-quality educational programming services to an area of Pennsylvania that might otherwise lack the resources to support a stand-alone public radio service. Finally, WITF's existing ties to Chambersburg and its commitment to serve the educational needs of the community through its programming will ensure that the Station serves the needs of its community of license despite the lack of a local main studio location.

Collocating the main studio for the Station with WITF-FM in Harrisburg will allow WITF to fulfill its educational mission in a manner consistent with the realities of the public broadcasting funding situation. WITF is dependent upon the State and Federal funding for approximately 18% of its operating revenues, and support from the public and individuals accounts for another 47% of its operating revenues. Consequently, it is vitally important for WITF to conserve financial resources wherever possible, as an extra expense in one area of its operations means fewer resources available for other, no less important or valuable, programs.

By eliminating the need for duplicative studio, personnel, and administrative costs, a consolidated main studio operation in Harrisburg will enhance WITF, Inc.'s capability to provide quality local and national public radio programming to listeners throughout Chambersburg and the surrounding area. Without this mode of operation, it would be difficult for WITF to both maintain a separate local studio, and provide high quality programming. WITF already utilizes its Harrisburg studio as a recording studio and production space for WITF-FM. Thus, allowing the Station to take advantage of the administrative and technical facilities currently on-hand in Harrisburg will be of particular benefit as WITF strives to provide varied public radio programming to the Chambersburg community in a cost-conscious manner.

As noted above, a vitally important source of funding for public broadcasting comes from individual and organizational support provided by members of the local community. The studio

² See *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).

collocation will allow the community of Chambersburg, a borough of only 17,940 people, to enjoy the same high-quality public radio service enjoyed and financially supported by the much-larger community of Harrisburg (population 47,196).³

In addition, the grant of a main studio waiver will not have an adverse effect on the ability of WITF to ascertain the needs of the Chambersburg community and address them through its programming, for the following reasons:

- Chambersburg is only 55 miles from Harrisburg, and WITF has concrete ties with the Chambersburg community. Notably, WITF-TV already operates a television translator station, W38AN, in Chambersburg, Pennsylvania.
- Chambersburg citizens will be able contact with WITF via a local number or toll-free number that permits residents throughout the listening area to reach the WITF-FM office without long-distance charges.
- WITF has subscribed to the print edition of the Chambersburg's local newspaper, the Chambersburg Public Opinion.
- WITF-FM has a staff of reporters and stringers in many parts of its listening areas, and sends reporters out from its Harrisburg main studio to cover news throughout its listening area, including Chambersburg.
- WITF is in discussions with Shippensburg University, Wilson College and Gettysburg College to develop a network of stringers and interns, in connection with each college's educational programs, that would cover the Chambersburg community.
- WITF has met with the Chambersburg Chamber of Commerce and anticipates attending future local meetings of community service organizations, such as Rotary Club or Kiwanis Club, in Chambersburg.
- WITF's Community Advisory Board has representation from the Chambersburg Community.
- WITF has a strong relationship with the Chambersburg Institute of Retired Persons. The institute sponsored a recent discussion of the FCC's decency rules, where WITF speakers drew an audience of over one hundred persons.

³ See U.S. Census Population Estimates for Hanover and Harrisburg, available at <http://factfinder.census.gov> (last visited September 8, 2008).

- WITF maintains an up-to-date website at <http://www.witf.org> which enables radio listeners to comment on programming via e-mail, ask questions, and obtain extensive information about WITF-FM's network schedules, programs and events.
- WITF provides a free program guide to members and to the public via the WITF-FM website.

These efforts will help WITF, as licensee of the Station, to select programming that is responsive to the needs of the Chambersburg community. WITF, Inc. will offer area listeners regionally-produced talk and public affairs programming – such as WITF News – that addresses issues of concern and interest to area residents. WITF will also provide listeners with access to NPR news programming and programs such as Morning Edition, All Things Considered, Weekend Edition, Weekend America, Fresh Air, Marketplace, Marketplace Morning Report among many others. WITF's ties to the Chambersburg community, and its efforts to ascertain and serve the needs of Chambersburg residents, will thus ensure that the Station's programming serves the needs of Chambersburg residents.

In sum, WITF submits that its commitment to ascertain and serve the needs of the Chambersburg community by providing high quality public radio programming, the likelihood that the Chambersburg community might not otherwise be able to support a comparable stand-alone noncommercial public radio outlet, and the necessity of conserving limited financial resources provide adequate justification for the grant of a main studio waiver. Accordingly, WITF respectfully requests waiver of Section 73.1125 of the Commission's rules to locate the main studio for the Station in nearby Harrisburg. WITF submits that the public interest will be well served by authorizing the Station as a satellite station with collocated operation from the studios of co-owned WITF-FM.