

## Main Studio Waiver Request

Family Life Ministries (“FLM”), the licensee of FM station WCIG, Dallas, Pennsylvania (Fac Id 19564) hereby requests a waiver pursuant to Section 73.1125(b)(2) of the Commission’s rules to permit FLM to locate the main studio for WCIG at the main studio of another FLM station, WCIK, Bath, New York (Fac Id 20631). In support, FLM provides the following information appropriate for a finding of “good cause” and respectfully submits that the grant of a waiver will be “consistent with the operation of the station in the public interest.”

FLM is a 501(c)(3) non-profit corporation, and currently operates fifteen (15) full power non-commercial educational radio stations and an extensive network of FM translators, all through direct listener and donor support. FLM proposes to operate WCIG as a “satellite” station of WCIK. The proposed main studio will be the WCIK studio in Bath, New York. The co-location of the main studios will generate valuable economies of scale and cost savings, allowing FLM to maintain high quality non-commercial educational programming in the small community of Dallas. Maintaining a staff and studio location separate from WCIK would otherwise place a serious financial burden on FLM and divert limited resources away from WCIG.

FLM will have a local representative to act as a liaison between the Dallas community and FLM’s programming personnel. The local representative will be charged with assisting FLM’s programming personnel in determining the needs, problems, and concerns of Dallas listeners on an ongoing basis, but at a minimum, once a calendar quarter. FLM will maintain a toll-free telephone number as required by Section 73.1125(e) of the Commission’s rules. Though the public inspection file for WCIG will be maintained at the main studio of the “parent” station in Bath, New York, FLM commits to make reasonable accommodation to listeners wishing to examine the public inspection file’s contents.

The Commission considers waiver requests by non-commercial educational stations on a case-by-case basis. See *Main Studio and Program Origination Rules*, 3 FCC Rcd 5024 (1988); *Review of the Commission Rules Regarding the Main Studio and Local Public Inspection Files of Broadcast Television and Radio Stations*, 13 FCC Rcd 15691, 15695 n.18 (1998). For non-commercial waivers requests, the Commission has expressly found “good cause” to exist in numerous instances based solely on a showing that centralized operations will provide economic benefit to non-commercial stations, provided that local service obligations are met. See *Letter to Roy R. Russo, Esq.*, dated January 24, 1994; *Letter to Richard J. Bordoff*, dated January 2, 1992; *The President of the Board of Trustees of the Miami University*, 7 FCC Rcd 2902 (1992); *The Cedarville College*, 6 FCC Rcd 538 (1991).

As set forth above, good cause exists for waiver of the main studio rule here. Further, allowing the combination of resources for these co-owned stations will allow FLM to provide better and more programming to better serve the public. This waiver is fully “consistent with the operation of the station in the public interest.” See *Report and Order, 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(1998); *recon. granted in part*, 14 FCC Rcd. 11113 (1999).

FLM respectfully requests that the Commission find, pursuant to Section 73.1125(b)(2) of its rules, that the public interest will be served by the consolidation of WCIG's main studio with WCIK's main studio, and authorize FLM to locate WCIG's main studio outside the location limits otherwise imposed by the rule.