

# AMERICAN FAMILY RADIO

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FEB 22 2005  
FCC - MAILROOM

February 18, 2005

Ms Marlene H. Dortch, Secretary  
Federal Communication Commission  
445 12<sup>TH</sup> Street, SW, Suite 222  
Washington, D.C. 20024

Re: WRAE, Raeford, NC, Facility ID. No. 88446

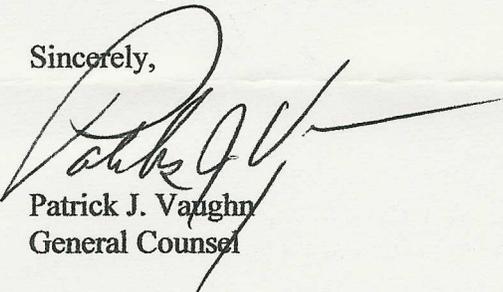
Dear Ms. Dortch:

Enclosed is an original and two copies of a Minor Modification for the above referenced file. American Family Association is requesting a Waiver of the Federal Communications Commission's rule §73.1125. AFA is requesting a waiver of WRAE to our licensed facilities in Tupelo, MS. Raeford, NC is located 880.2 km/ 547 miles from the licensed facilities in Tupelo, MS.

This waiver will enable AFA the economic benefits of a centralized operation, as the Commission has recognized (Memorandum Opinion and Order in MM Docket 86-406, 3 FCC Red 5024 (1988)).

Also enclosed is an extra copy to be stamped as received and returned to us in the self addressed, stamped envelope. If you or your staff has any questions concerning the enclosed, please contact me.

Sincerely,



Patrick J. Vaughn  
General Counsel

Enclosure

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2005 FEB 22 P 2:41H  
AUDIO SERVICES DIVISION

**AMERICAN FAMILY ASSOCIATION  
WRAE  
RAEFORD, NC**

**REQUEST FOR WAIVER OF §73.1125**

Petitioner American Family Association, Inc. ("Family") submits the following in support of its request for a waiver of the main studio rule set forth in §73.1125 of the Commission's rules:

1. Family holds the licenses for approximately 200 NCE-FM stations which it operates as the American Family Radio Network with headquarters in Tupelo, MS.

2. Family has a licensed non-commercial educational FM broadcast station in Raeford, NC, (WRAE).

3. In order to obtain the economic benefits of centralized operations, as the Commission has recognized (Memorandum Opinion and Order in MM Docket 86-406, 3 FCC Rcd 5024 (1988)), Family intends to deliver its signal from its Tupelo headquarters to the licensed broadcast facility in Raeford, NC.

4. Family is cognizant of its local service obligations, and has developed a plan to allow it to determine local needs and respond to them in its programming. This plan will include, at a minimum, the following components:

- {a} Family will add to its Community Advisory Board at least one resident of Raeford, NC, who will be asked to provide recommendations on community needs and programming directly to the management of Family;
- {b} Family will, during each regular "Shareathon" (pledge drives normally held every six months), solicit listeners' opinions regarding community issues that should be addressed during program planning. Family will track the listener response by community and factor those responses in its planning of the program schedule and the issues to be addressed;
- {c} Family will provide periodic local programming for Raeford coverage of significant local news or cultural events;
- {d} Family will provide for the broadcast of local public service announcements;

**AMERICAN FAMILY ASSOCIATION**

**WRAE**

**RAEFORD, NC**

{e} Family will maintain a toll-free number for the community of Raeford.

5. Because of the limited funding available to non-commercial educational broadcast stations, and the economic benefits of centralized operation, Family respectfully requests a waiver of the requirement of maintaining a main studio within the principal community contour, as provided in §73.1125 (a) (4) of the Commission's rules.