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July 21, 2017

**VIA COURIER**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**ACCEPTED/FILED**

JUL 21 2017

Federal Communications Commission  
Office of the Secretary

Re: Request for Main Studio Waiver  
Station WSTM(FM), Kiel, Wisconsin  
Facility ID No. 90655

Dear Ms. Dortch:

By this letter, Evangel Ministries, Inc. ("EMI") respectfully requests a waiver of Section 73.1125(a) of the Commission's rules (the "Main Studio Rule") for non-commercial educational Station WSTM(FM), Kiel, Wisconsin (Facility ID No. 90655).<sup>1</sup>

If this request is granted, EMI, which only recently became the licensee of WSTM(FM), *see* FCC File No. BALED - 20170202ABH, will operate the station as a satellite of EMI's non-commercial educational Station WEMI(FM), Appleton, Wisconsin (Facility ID No. 19878). Operation in this manner will allow WSTM(FM) to continue to provide the residents of Kiel and surrounding areas with a valuable program service, and will result in substantial cost-savings that will be devoted to the enhancement of the combined operations of the stations.

The Commission's policy is to grant waivers of the Main Studio Rule upon a showing of good cause and when approval of the waiver "would be consistent with the operation of the station in the public interest." 47 C.F.R. Section 73.1125(b)(2); *see also Main Studio and Local Public Inspection Files of Broadcast Television and Radio Stations*, 13 FCC Rcd 15691, 15695 n.18 (1998). Traditionally, "[t]he Commission has recognized the benefits of centralized operations for NCE stations, given their limited funding, and thus has found good cause exists to waive the main studio location requirement where satellite operations are proposed." *Aaron P. Shainis, Esq.* 28 FCC Rcd 126, 134 (MB 2013).

<sup>1</sup> This letter supplements a letter submitted July 20, 2017 regarding this issue.



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To ensure that WSTM(FM) fulfills its local service obligations to the residents of Kiel, EMI will: (1) ascertain the needs and interests of Kiel residents at least on a quarterly basis and provide programming addressing those needs and interests; (2) maintain a website whereby Kiel residents can communicate directly with EMI concerning programming and station operation; (3) maintain a local Kiel telephone number or a toll-free telephone line by which residents can contact EMI management; and (4) maintain a public inspection file for WSTM(FM) at the main studio of its proposed parent station, WEMI(FM), making reasonable accommodations to listeners wishing to examine the file's contents.

Good cause exists to waive the Main Studio Rule in this case. Accordingly, EMI respectfully requests that the Commission grant a waiver of the Main Studio Rule for Station WSTM(FM).

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'F. Scott Pippin'.

F. Scott Pippin

*Counsel to Evangel Ministries, Inc.*

cc (by email): Michael Wagner (Michael.Wagner@fcc.gov)  
Karen Workeman (Karen.Workeman@fcc.gov)