

Assignee's Exhibit Nos. 13 and 20 (amended)
FCC Form 314

Waiver of the Main Studio Rules and Statement Regarding the Assignee's
Eligibility to Acquire the WTSG(FM) License and Operate the Station

In this amended exhibit the assignee, Cornerstone Community Radio, Inc. ("CCR") seeks a waiver of the FCC's "main studio" rule (Section 73.1125 of the Rules) to permit operation of WTSG as a "satellite" of CCR's AM station WLLM, with WTSG's "main studio" co-located with WLLM's main studio at 800 S. Postville Dr., Lincoln, Illinois 62656. To facilitate the FCC's approval of this waiver request, CCR has filed an application (File No. BML-20130130ALH) to modify the WLLM license to reflect "noncommercial educational" status, conforming the station's license to its operation ever since the station was acquired by CCR, in 2003. Appended to the WLLM modification of license application are exhibits, including Page 2 of FCC Form 340, which are hereby incorporated by reference as if fully set forth herein, showing that CCR has been previously found qualified to hold a noncommercial education license, including recognition of its status as a not-for-profit educational organization under Section 501(c)(3) of the Internal Revenue Code, its educational purpose and its overall educational program.

CCR owns several noncommercial educational FM broadcast stations in Illinois and Iowa which operate under waivers similar to that requested here as satellites of CCR's WLUI(FM), located at 600 W. Mason Street, Springfield, Illinois 62702. CCR is fortunate to also own WLLM, which enables CCR to provide a non duplicative but similar noncommercial educational program service to much of Central Illinois. If this waiver request is granted, CCR will be able to extend this service to the audience currently served by WTSG, Carlinville, Illinois, and its translator station W218BA, Jacksonville, Illinois.

Section 73.1125(b) of the rules permits location of a main studio not listed in 73.1125(a) "when good cause exists..." for a waiver of the rules.

The community of Carlinville is approximately 80 miles from the location of the WLLM main studio in Lincoln. Virtually all of that distance may be traveled on Interstate highway I-55. Accordingly, while co-location of the main studio for WTSG with that of WLLM would require a waiver of the requirements of Section 73.1125(a) of the Rules, the co-located WTSG main studio would remain reasonably accessible to members of the public in the WTSG service area. Equally important, WTSG has heretofore produced it's

program material from the combined Studio of WIBI(FM) located in Carlinville, Illinois. Because of economic considerations, the assignor has announced that, in addition to assigning WTSG to CCR, it will be consolidating the operations of WIBI with its station, WBGL(FM), in Champaign, Illinois. (and closing the Carlinville Studio) Under these circumstances, CCR believes that the acquisition of WTSG, which it believes will be sustainable with the requested waiver, is vital to assure WTSG's continued service as a noncommercial educational broadcast station in Carlinville. The FCC, on numerous occasions, has recognized that the efficiencies arising from the co-location of administrative and programming functions at the main studio of a flagship station are an important public interest factor that warrants a waiver of the main studio to operate an NCE FM station on a "satellite" basis.

All of CCR's stations rely principally on listener contributions for financial support and operate with the assistance of a number of volunteers. The expense of operating a main studio at Carlinville (or any other location other than the WLLM main studio) would consume financial resources that are needed to allow both stations to continue to operate and provide listeners with relevant programming.

To assure that the operation of WTSG with its main studio in Lincoln will be consistent with the public interest, CCR and its management at WLLM will: (1) provide a toll-free phone number to the Lincoln studio from the Carlinville area; (2) provide copies of material in the WTSG public inspection file via First Class U.S. mail upon request (3) consult quarterly with members of the public in the Carlinville area concerning community issues and programming interests; (4) broadcast community calendar and other public service announcements for Carlinville organizations; (5) list Carlinville area community events on the WLLM website; 6) provide an opportunity for members of the public to interact with CCR staff and management via the WLLM web site: www.wllmradio.com.

Accordingly, a main studio waiver for WTSG to operate as a satellite of WLLM is in the public interest as it will allow the station to continue to operate and provide programming that otherwise would not be available.