

**REQUEST FOR WAIVER OF 47 CFR §73.1125  
AND FOR GRANT OF "SATELLITE STATUS"**

Real Presence Radio hereby respectfully requests that the Commission grant "satellite" status when it acquires FM Broadcast Station KQFR, Rapid City, South Dakota, to be a satellite of co-owned non-commercial station KWTL(AM), Grand Forks, North Dakota; and (2) that the Commission grant a waiver of Section 73.1125 of the Commission's Rules so that the main studio for station KQFR can be co-located with the studio of KWTL at 216 Belmont Road, Grand Forks, North Dakota; the program material for KQFR would be delivered via either satellite, telephone line or internet to the KQFR transmitter site near Rapid City, South Dakota.

It is noted that, at present, KQFR's operating license, File No. BMLD-20130827AAF, granted September 24, 2013, permits it to be a "satellite" of KEAR(AM), San Francisco, California. Rapid City is approximately 1,090 airline miles from San Francisco.

**Preliminary Statement**

Real Presence Radio (RPR) is a non-stock, non-profit corporation chartered in North Dakota with tax-exempt status granted by the Internal Revenue Service pursuant to 26 U.S.C. §501(c)(3). KQFR(FM) operates on 88.9 MHz in the non-commercial educational portion of the FM band.

Real Presence Radio is the holder of non-commercial licenses for: KWTL(AM), Grand Forks, North Dakota, FCC Facility ID # 69201; KVXR(AM), Moorhead, Minnesota, FCC Facility ID #35863; KPHA(FM), Mandan, North Dakota, FCC Facility ID #172316; KZZQ(FM), Richardton, North Dakota, FCC Facility ID #189545; KXRP(FM), Bismarck, North Dakota, FCC Facility ID #90269; and KZTW(FM), Tioga, North Dakota, FCC Facility ID #190440.

**Satellite Status/Main Studio Location Rule Waiver**

The KWTL studio site (at approximate NAD27 coordinates 47° 55' 12" North and 97° 01' 42" West) is 398.581 miles (641.455 km) northeast (46.05°) of the Rapid City, South Dakota reference coordinates published in the National Atlas of the United States (44° 04' 34" North Latitude and 103° 13' 42" West Longitude). RPR seeks that KQFR(FM) be

designated as a "satellite" of KWTL) and that a waiver of Section 73.1125 be granted. We would note that this request is similar to request filed by RPR for main studio waiver and satellite station status for: (1) AM Broadcast Station KVXR, Moorhead, Minnesota, File No. BML-20090227ACS, granted on August 14, 2009; (2) NCE FM Broadcast Station KPHA, Mandan, North Dakota, File No. BLED-20101110AEB, granted November 30, 2010; (3) NCE FM Broadcast Station KZZQ, Richardton, North Dakota, File No. BML-20120920AEO, granted October 18, 2012; (4) NCE FM Broadcast Station KXRP, Bismarck, North Dakota, File No. BALED-20141001CIH, granted November 13, 2014; and (5) NCE FM Broadcast Station KZTW, Tioga, North Dakota, File No. BLED-20141205AAE, granted January 21, 2015.

The requested waiver would be invaluable to assisting Real Presence Radio in preserving scarce resources derived from its listener support in order to provide the unique high-quality program service that Real Presence Radio provides to Rapid City and surrounding communities in western South Dakota.

With respect to public interest benefits to be achieved by a "satellite operation", by consolidating the operation at RPR's studio/office location in Grand Forks, we estimate that we can save at least \$30,000 per year in salaries and other related costs. With the money we save, we can improve the program service that we will provide to KQFR and the surrounding region. RPR has been granted 26 U.S.C. §501(c)(3) tax exempt status by the Internal Revenue Service, and its revenues come from donations.

In order to better ascertain the needs and interests of Rapid City, Pennington County and the KQFR service area and to provide programming to the KQFR service area, RPR proposes to take the following steps: (1) RPR will subscribe to *The Rapid City Journal*, the daily newspaper serving Rapid City; (2) on a quarterly basis, RPR will conduct interviews with Rapid City leaders and residents; (3) RPR will recruit a resident the Rapid City area to serve on either its board of directors or an advisory council; (4) RPR will develop periodic local programming for the Rapid City market including coverage of news and cultural events; and (5) RPR will provide the broadcast of local public service announcements of interest to Rapid City and KQFR service area residents.

To facilitate listener input, we maintain (1) a "contact us" feature on our website, [www.yourcatholicradiostation.com](http://www.yourcatholicradiostation.com), and (2) a toll-free telephone number which can be used by the residents of Rapid City and the KQFR service area free of charge, 1-877-795-0122.

The Commission has on previous occasions waived the Main Studio Rule to permit "satellite" operation. See e.g. *American Family Association (Marksville, Louisiana)*, 12 FCC Rcd 15128 (1997).

The public interest, convenience and necessity would be well served by a grant of this request.