<u>Request for Modification of Main Studio Waiver</u>

Family Stations, Inc. ("FSI"), licensee of Station WYTN (FM), Facility Id. No. 20940, Youngstown, OH, respectfully requests a modification of its waiver of the Commission's main studio rule, 47 C.F.R. § 73.1125, to permit WYTN, a satellite of Noncommercial Educational ("NCE") Station WJCH (FM), Facility ID No. 20847, Joliet, Illinois, to satisfy the public file requirement through online access, rather than requiring a paper file to be maintained in Youngstown, OH and to allow it to become a satellite station of KEAR (AM), Facility Id. No. 1082, San Francisco, California, the main studio of which is located at the FSI corporate headquarters in Oakland, California, to satisfy the public file requirement through online access, rather than requiring a paper file to be maintained in Youngstown, OH.

The Commission has repeatedly recognized the benefits of centralized operations for NCE stations, given their limited funding, and thus has found that good cause exists to waive the main studio rule where NCE satellite operations are proposed. *See, e.g., Letter from H. Taft Snowdon to Alan C. Campbell*, 1800B3-MH (2002) (granting waiver of the main studio rule to permit WEFR(AM), Erie, PA, to operate as a satellite of co-owned WJCH(FM), Joliet, Illinois) ("*WEFR Waiver*"); *Delmarva Educational Association*, 19 FCC Rcd 6793 (2004); *Amendment of Section 73.1125 and 73.1130 of the Commission's Rules*, 3 FCC Rcd 5024, 5027 (1988). In each such case, the Commission staff determined that the waivers were justified on the basis of the limited funding available to the stations, the increased efficiencies resulting from co-location of studios, and the public interest benefits that result from such satellite operation.

FSI is a non-profit corporation that produces and delivers, via satellite or Internet delivery, Family Radio Network noncommercial educational programming to more than 60 NCE radio

broadcast stations across the United States. The majority of the FSI stations currently operate pursuant to main studio waivers. *See, e.g., WEFR Waiver*, *supra*.

WYTN is one of those stations, and it has successfully operated as a satellite station for more than ten years without complaints from the community about its lack of a local main studio. However, the requirement to maintain a paper public file in Youngstown, OH is a financial and administrative burden, which diverts FSI's limited resources from Family Radio's programming efforts; if Family Radio is able to centralize the public file operations of WYTN with other stations using its website, it will be able to substantially reduce its compliance costs and direct more money to its programming, while making it easier for residents to obtain the information it contains.

In consideration of the public interest obligations incumbent on broadcast licensees, FSI proposes the following to ensure that WYTN fulfills its local service obligations to the residents of Youngstown, OH: (i) on at least on a quarterly basis, an employee representative of FSI will conduct interviews and surveys of local community leaders and residents to ascertain the interests, concerns, and needs of Youngstown listeners, which feedback will be used to develop responsive local public affairs programming; (ii) FSI will establish and advertise a toll-free telephone number to for use by residents of Youngstown to contact FSI personnel about the station; and (iii) FSI will make the contents of the WYTN public inspection file, which will be maintained at the KEAR studio, available on the Internet and/or provide accommodations for listeners wishing to review the contents the public file.

In light of the foregoing, FSI requests that the Commission find, pursuant to Section 73.1125(b)(2) of the Commission's rules, that the public interest will be served by the modification of WYTN's main studio waiver to allow for the posting of its public file on the Internet instead of at

a location in Youngstown, OH, and therefore that good cause exists to grant a modified waiver of the

main studio rule in this instance.