

**University of Utah, Assignee
KZCL(FM) (Fac. ID 89301), Logan, UT**

**Exhibit 17
Annex A
FCC Form 314
Section III, Item 6**

Main Studio Waiver Request

The University of Utah (the “University”) is the proposed assignee of noncommercial educational (“NCE”) FM radio station KZCL(FM), Logan, Utah. To ensure that the University can most efficiently and effectively operate KZCL(FM) in service to the people of Logan and the surrounding communities, the University respectfully requests a waiver of Section 73.1125(a) of the Commission’s rules (the “main studio rule”) to be granted concurrently with the assignment application. The requested waiver of the main studio rule would permit co-location of the KZCL(FM) main studio with the main studio of KUER(FM), which is licensed to the University in Salt Lake City and is located approximately 80 miles from Logan.

Upon its acquisition, the University will operate KZCL(FM) as a “satellite” station of KUER(FM), so that KZCL(FM) will be part of the statewide network of full-power and translator stations that the University employs to provide a noncommercial mix of National Public Radio (“NPR”), BBC, local news and jazz music programming to listeners throughout the state of Utah. The Commission previously has granted main studio waivers to the University to co-locate the main studios of the three other full-power satellite stations of KUER(FM) – KUHU(FM), Monticello, UT; KUOU(FM), Roosevelt, UT; and KUXU(FM), Monroe, UT – with the main studio of KUER(FM) in Salt Lake City.

The University is a state governmental entity with limited financial resources available for its broadcasting activities, and co-location of KZCL(FM)'s main studio with that of KUER(FM) will enable the University to realize important efficiencies and economies of scale. The Commission long 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," as is the case here.¹

In addition, the University takes seriously its local service obligations to the citizens of Logan and will ensure fulfillment of those obligations. The University will maintain a public inspection file in the community of license and a toll-free number to reach the main studio will be available throughout the service area. The University already ascertains community issues and needs in rural areas such as Logan, and will continue to do so by providing local, remote broadcasts in small communities participating in live, on-air discussions. Moreover, the University will continue to include coverage of the Logan area in its news and public affairs programming.

Accordingly, good cause exists to permit the co-location of the main studio of KZCL(FM) with that of KUER(FM) upon the University's purchase of KZCL(FM), and such operation will be consistent with the operation of KZCL(FM) in the public interest. *See* 47 C.F.R. § 73.1125(b)(2). The University respectfully requests that the main studio waiver requested herein be granted.

¹ *Applications of Delmarva Educational Association*, Memorandum Opinion & Order, 19 FCC Rcd. 6793, 6798 (2004).