

REQUEST FOR STUDIO WAIVER – KBMI-FM

APPLICATION FOR WAIVER OF MAIN STUDIO LOCATION RULE KBMI-FM (FM) EAST HELENA, MONTANA

THIS APPLICATION FOR MODIFICATION OF LICENSE OF KBMI-FM SEEKS A WAIVER OF THE MAIN STUDIO LOCATION RULE, SECTION 73.1125(B) OF THE COMMISSION'S RULES AND REGULATIONS.

THE APPLICANT, AND ITS PROPOSED OPERATION OF KBMI-FM, MEETS ALL OF THE CRITERIA WHICH THE FCC DEEMS NECESSARY IN ORDER TO GRANT SUCH A REQUEST.

THE APPLICANT, HI-LINE RADIO FELLOWSHIP, INC. ("HI-LINE"), WAS FORMED IN 1980 FOR THE PURPOSE OF OWNING AND OPERATING NON-COMMERCIAL EDUCATIONAL RADIO STATIONS TO SERVE RURAL AREAS OF MONTANA AND OTHER WESTERN STATES. HI-LINE IS A NON-PROFIT ORGANIZATION, AUTHORIZED AND EXISTING UNDER THE LAWS OF THE STATE OF MONTANA, AND IS RECOGNIZED AS A TAX-EXEMPT ORGANIZATION UNDER THE INTERNAL REVENUE CODE OF THE UNITED STATES OF AMERICA.

HI-LINE PROPOSES TO OPERATE KBMI-FM, EAST HELENA, MONTANA, FROM THE MAIN STUDIO OF CO-OWNED NON-COMMERCIAL/EDUCATIONAL FM STATION KXEI, HAVRE, MONTANA, FEEDING ITS PROGRAMMING FROM THE HAVRE STUDIO TO KBMI-FM VIA SATELLITE. THE APPLICANT CURRENTLY FEEDS A NUMBER OF CO-OWNED NONCOMMERCIAL EDUCATIONAL FM STATIONS IN MONTANA, WYOMING, IDAHO, AND NORTH DAKOTA BY SATELLITE, UNDER EXISTING STUDIO WAIVERS PREVIOUSLY GRANTED BY THE FCC. SEE BLED-20081201ALX.

THE AREAS SERVED BY THE APPLICANT'S CURRENTLY AUTHORIZED STATIONS SHARE MANY SIMILARITIES WITH THE KBMI-FM COMMUNITY OF LICENSE, EAST HELENA, MONTANA.

AS THEY ARE ALL PRIMARILY RURAL COMMUNITIES, THEY SHARE MANY COMMON CONCERNS, PROBLEMS, AND INTERESTS. THE APPLICANT IS CONFIDENT THAT THE PROGRAMMING IT CURRENTLY ORIGINATES FROM ITS MAIN STUDIO AT KXEI, HAVRE, MONTANA, WILL ADEQUATELY SERVE EAST HELENA, MONTANA AS WELL.

AS THE LICENSEE OF KBMI-FM, THE APPLICANT, ON A QUARTERLY BASIS, CONDUCTS ASCERTAINMENTS OF COMMUNITY NEEDS AND DETERMINES HOW KBMI-FM MAY BE USED TO MEET THESE NEEDS. DOCUMENTATION OF THE ASCERTAINMENT STUDIES, AND THE WAYS THE STATION PROPOSES TO MEET ANTICIPATED NEEDS, ARE MAINTAINED IN THE STATION'S PUBLIC INSPECTION FILE. THE APPLICANT WISHES TO NOTIFY THE COMMISSION THAT, IN THE EVENT OF A GRANT OF ITS REQUEST FOR A WAIVER OF THE MAIN STUDIO LOCATION RULE, IT SHALL CONTINUE TO CONDUCT ITS QUARTERLY ASCERTAINMENT STUDIES OF COMMUNITY NEEDS AND CONTINUE MEETING THOSE NEEDS SO AS TO ADEQUATELY SERVE THE PUBLIC INTEREST AS THE LICENSEE OF KBMI-FM.

IN ITS ONGOING EFFORT TO SERVE THE RESIDENTS WITHIN THE KBMI-FM COVERAGE AREA, THE APPLICANT WILL MAINTAIN A TOLL-FREE "WATS" TELEPHONE LINE ENABLING ALL RESIDENTS OF THE KBMI-FM LISTENING AREA TO CONTACT THE HAVRE, MONTANA, STUDIO BY TELEPHONE AT ANY TIME WITHOUT A TOLL CHARGE.

THE APPLICANT SHALL SUBSCRIBE TO THE ASSOCIATED PRESS, OR A SIMILAR NEWS SERVICE, IN ORDER TO OBTAIN INFORMATION WHICH IT WILL BROADCAST TO THE KBMI-FM AUDIENCE. THIS SHALL INCLUDE LOCAL AND STATE INFORMATION (SUCH AS NEWS, WEATHER, SPORTS INFORMATION, FARM AND ECONOMIC DATA, ETC.). THE APPLICANT ALSO PLEDGES THAT IT SHALL MAKE AIRTIME AVAILABLE, FREE OF CHARGE, TO NON-PROFIT AND CHARITABLE ORGANIZATIONS WITHIN THE KBMI-FM SERVICE AREA FOR THE BROADCAST OF PUBLIC SERVICE ANNOUNCEMENTS. THE APPLICANT SHALL ENCOURAGE SUCH ORGANIZATIONS TO SUBMIT INFORMATION ANY TIME BY WAY OF ITS TOLL-FREE TELEPHONE LINE, E-MAIL, BY FAX, OR BY REGULAR MAIL.

HAVRE, MONTANA, AND EAST HELENA, MONTANA, ARE BOTH SMALL, RURAL COMMUNITIES, LOCATED JUST 205 ROAD MILES APART. BOTH ARE RURAL COMMUNITIES WITH A LIMITED AMOUNT OF INDUSTRY.

DUE TO THE LIMITED POPULATION WITHIN THE KBMI-FM COVERAGE AREA, AND THUS THE LIMITED FINANCIAL SUPPORT ANTICIPATED FOR THE OPERATION OF KBMI-FM, THE APPLICANT FEELS THAT A GRANT OF THIS REQUEST FOR A WAIVER OF THE MAIN STUDIO LOCATION RULE IS ESSENTIAL TO THE FINANCIAL WELL-BEING OF KBMI-FM AND HI-LINE. FURTHER, IN LIGHT OF THE EFFORTS THE APPLICANT HAS PLEDGED TO MAKE ON AN ONGOING BASIS, THE APPLICANT IS CONFIDENT THAT IT'S OPERATION OF KBMI-FM AS PROPOSED IN THIS APPLICATION WILL SERVE THE PUBLIC INTEREST AND BE BENEFICIAL TO THE APPLICANT'S ORGANIZATION.