

**Exhibit 13 Page 1**  
**Network of Glory, Inc.**  
**Waiver Request of §73.1125**  
**Lynchburg, Tennessee**

Network of Glory, Inc. ("NOG") grantee of new unbuilt noncommercial FM station facility ID 171691, Lynchburg, Tennessee, hereby requests a waiver of §73.1125(a). Although the Rule requires the main studio to be within 25 miles of the reference coordinates of the community of license, "good cause" exists to locate the main studio at a location other than within the community of license. The Commission has previously recognized the advantages of having a studio separate from the community of license.

"In the past, we have recognized the benefits of centralized operations for noncommercial educational stations, given the limited funding available to these stations"

*3 FCC Rcd 5024, 1988*

NOG is a non-stock, non-profit corporation organized for the purpose of leading the unsaved to a saving knowledge of Jesus Christ, and to edify the body of believers in the region. NOG intends to accomplish this desire with programming that is educational, inspirational, and enjoyable. The main studio is to be located at NOG's new NCE FM station, WAKP in Smithboro, Georgia and would like to operate Lynchburg, TN, as a satellite. Having an additional studio in Lynchburg would be redundant, and place a large financial burden upon the applicant. This would be counterproductive to the applicants' efforts to meet its public service requirements. The costs of building and staffing a separate main studio are substantial. The estimated costs of maintaining the separate studio have been included below.

Studio equipment	\$49,500
STL equipment	<u>10,000</u>
Total	\$59,500

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In addition to the fixed expenses above, NOG also plans to have three full-time employees at the Lynchburg studio facility with the following approximate salaries:

Station manager/announcer	\$45,000 / year (includes benefits)
Sales (acknowledgements)	30,000
Secretary/receptionist	25,000
Contract engineer	<u>3,600</u>
Total	\$103,600

The estimated costs of operating the studio are as follows:

Rent	\$12,000 / year
Utilities	6,000
Maintenance & Janitorial	<u>4,000</u>
Total	\$22,000

Thus, the total estimated cost for one year of operation is \$185,100. With the exception of the contract engineer amount, all of the costs could be saved by the requested waiver.

NOG will maintain a fully staffed studio and production facility at the WAKP studio. Most of the programming will originate from this location and will allow direct access to senior management and staff. As the station will be supported by donations, the extra expense of building a studio, production facility and staff would not only impose a significant financial burden to the applicant, but also delay construction of the station.

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NOG will satisfy the needs and interests of the residents of Lynchburg, Tennessee by conducting the following:

- 1.) Maintain a toll-free telephone number whereby the residents of Lynchburg and surrounding areas can contact radio station management to express concerns, opinions, and improvements in the content of the station. This will comply with the requirements of §73.1125(e).
- 2.) Maintain a duplicate local public inspection file in Lynchburg with appropriate updates as required by §73.3527(e)(8).
- 3.) An advisory board of community leaders will be established to advise NOG on the needs of the community.
- 4.) Subscribe to community papers published in Moore County.
- 5.) A community bulletin board will be broadcast by the station weekly which will provide information on upcoming community events.

NOG believes that good cause exists in the operation of the station from the same studio as WAKP. The benefits are threefold 1.) The financial savings, by locating the station at the WAKP studio will allow higher quality programming to reach the residents of Lynchburg. 2.) By having frequent contact with the residents of Lynchburg, through the above-mentioned initiatives, the applicant will be able to tailor the programming to the needs and interests of the community. 3.) A waiver of the main studio requirements would serve the public interest, convenience and necessity.

Based on the foregoing reasons, NOG respectfully requests that the Commission grant the instant request for waiver of §73.1125(a) of the Rules to permit NOG to operate from the WAKP studio in Smithboro, Georgia.