

## **REQUEST FOR WAIVER OF MAIN STUDIO RULE**

### **Background of Applicant**

WPRR, Inc., the proposed assignee of Station WXPZ, Clyde Township, Michigan, hereby requests a waiver of Section 73.1125 of the Rules to permit the main studio of Station WXPZ to be located at 3777 44<sup>th</sup> Street, Kentwood, Michigan 49512. In support of this request, the following is submitted.

WPRR, Inc. is a not-for-profit corporation organized under the laws of the State of Michigan, and has been certified as a Section 501(c)(3) tax exempt organization by the Internal Revenue Service.

WPRR, Inc. is the licensee of noncommercial educational station WPJC, Pontiac, Illinois. Additionally, for nearly four years, WPRR, Inc. has been providing the programming for Station WPRR(AM), Ada, Michigan, which is a commercial station operating in a noncommercial manner. WPRR, Inc. also provides the programming for FM translator station W237CZ, Grand Rapids, Michigan, which rebroadcasts the signal of Station WPRR(AM).

### **Station WXPZ**

The licensed transmitter site of Station WXPZ is at Ganges, Michigan, although the station presently operates pursuant to Special Temporary Authority (STA) from a site at Fennville, Michigan. The present studio for the station is located at Caledonia, Michigan. The distance between Ganges and Caledonia is approximately 40 miles. The distance between Fennville and Caledonia is approximately 34 miles.

WPRR, Inc.'s existing studio at Kentwood is located approximately 38 miles from Ganges, Michigan, and approximately 32 miles from the STA transmitter site at Fennville, Michigan. Thus, the distances between the licensed and STA transmitter sites of Station WXPZ and its main studio are about the same as the distances between those transmitter sites and the existing WPRR, Inc. studio.

A main studio at the WXPZ STA transmitter site is not feasible. The antenna is located on a farm silo. A studio at the presently licensed WXPZ transmitter site is also unlikely since the current licensee was unable to reach any agreement with the tower owner on transmitter space. Accordingly, WPRR, Inc. would be required to find a location for a new main studio as well as a new transmitter site.

Establishment of a local main studio would require purchase or lease of premises in the vicinity of Clyde Township, and furnishing those premises with equipment which essentially duplicates that already in place in Kentwood. The programming for Station WXPZ can be delivered to the transmitter site by telephone line, microwave or internet.

### **Expense and Revenue Expectations**



The cost of leasing space and staffing it, with two employees, assuming qualified persons are available in a community of fewer than 2,100 persons, would be a minimum of \$50,000 per year, for rent, utilities, salaries, benefits, payroll taxes, etc.

In addition, it would require an initial outlay of at least \$65,000 to equip the studio, as shown on Exhibit 1 hereto.

Since Station WXPZ is currently operating pursuant to STA, WPRR, Inc. must also locate a new transmitter site, obtain FCC and local authorizations for that site and construct on that site. An unknown amount will be needed for that project.

Heretofore, Station WXPZ has been licensed to Larlen Communications, Inc., a licensee broadcasting primarily religious programming. WPRR, Inc. proposes to broadcast secular programming, appealing to a different audience. Accordingly, it will be bringing a completely new format to the community, with no established listener base or donation base. Its revenue expectations at the outset and for the immediate future are small, with operations to be funded primarily by the directors and the existing donors to WPRR, Inc.

#### **Contacts with Clyde Township**

Clyde Township is located only approximately 40 miles from Kentwood. Members of the WPRR, Inc. board will regularly be in contact with community leaders in Clyde Township and the surrounding area to ascertain what they believe to be the needs and interests of the community. Using that information, WPRR, Inc. will develop and broadcast, on WXPZ, programming to address those needs and interests. Of course, quarterly issues/programs lists will be maintained.

In addition to the public inspection file at the Kentwood main studio, a duplicate public inspection file will be maintained and kept up to date at a convenient location in or nearby Clyde Township, probably at a public library.

WPRR, Inc. will establish and publicize the existence of a toll-free telephone line from Clyde Township to the WPRR, Inc. studio.

#### **Conclusion**

As noted above, this station does not presently have a main studio in Clyde Township. Further, the waiver sought here is consistent with a waiver previously granted to WPRR, Inc. for its station in Pontiac, Illinois, as well as waivers granted for stations such as WWTE, Wellfleet, MA, WTSE, Cypress Quarters, FL, KTBR AM/FM, Roseburg, OR, and others.



# Exhibit 1

## Equipment and Installation Cost Estimates

### Description

STL Xmtr/Rcvr	\$12,000.00
2, 4-foot STL antennas	\$ 3,000.00
200 feet of transmission line	\$ 2,000.00
Installation of antennas and T-line	\$ 7,000.00
Hardware for mounting and installation	\$ 150.00
2 basic 8-channel broadcast audio consoles	\$ 8,000.00
Telephone hybrid interfaces, x 2	\$ 800.00
2 CD players	\$ 400.00
1 CD recorder	\$ 650.00
Audio cable, punch-blocks, XLR connectors	\$ 1,000.00
EAS CAP-ready system	\$ 2,050.00
EAS dual receiver + rack mount	\$ 950.00
Monitor amplifier + speakers; main studio	\$ 1,050.00
Monitor amplifier + speakers, production studio	\$ 1,050.00
4 EV RE-20 microphones	\$ 1,200.00
4 EV shock-mounts, "booms" & risers for above	\$ 600.00
Mid Atlantic 40-space equipment rack	\$ 1,200.00
2 primary power surge/lightning protection power strips	\$ 450.00
2 36-inch wooden studio equipment racks	\$ 400.00
Sine Systems RC-8 remote control system	\$ 1,600.00
Silent Monitor for above	\$ 200.00
4, dbx microphone processors	\$ 800.00
2, 6x2 distribution amplifiers	\$ 400.00
2, 6x1 telephone hybrids	\$ 2,400.00
1 Package of studio headphones	\$ 100.00
Basic studio furniture "kits", times 2	\$ 6,000.00
Estimated shipping/handling	\$ 650.00
Misc. hardware, electrical wiring, sound-treatment, etc.	\$ 1,050.00
Estimated on-site installation work (5 days @ \$800.00/day)	\$ 4,000.00
Estimated on-site per diem	\$ 600.00
Estimated local telephone, electric installation	\$ 2,500.00
Estimated local building, electrical and occupancy permits	\$ 750.00
Total as above detailed .....	<u>\$65,000.00</u>

Exhibit 1 prepared by:  
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