

Request for Main Studio Rule Waiver

BBN hereby respectfully requests that the Commission grant a waiver of Section 73.1125(a) of the Commission's rules to permit BBN to operate noncommercial FM Station WHPE-FM, High Point, NC, as a "satellite" of BBN's station WYFQ (AM), Charlotte, North Carolina (Facility ID No. 5152). Currently, BBN holds a waiver of Section 73.1125(a). Good cause for continued waiver exists. In support of its request, it is stated as follows:

BBN faces a heavy financial burden in operating its stations as fully staffed and independently programmed stations. In light of this, BBN has successfully obtained main studio waivers for its other full-power noncommercial educational stations using WYFQ as the primary station, and would like to do the same for WHPE-FM. Thus, this request seeks a waiver of the staffing requirement of Section 73.1125(a) of the Commission's Rules. See, *Jones Eastern of the Outer Banks*, 6 FCC Rcd 3615 (1990) and the *Memorandum Opinion and Order in MM Docket No. 86-406*, 3 FCC Rcd 5024 (1988). In requesting this waiver, BBN intends to meet its local service obligation in the following manner:

BBN has a Community Advisory Board with at least one member from Charlotte and another from High Point. Those members will, at least quarterly, ascertain the needs and interests of WHPE-FM listening audience. BBN will send management and employees to visit listeners to determine local interest that need to be addressed and a certain amount of programming from WHPE-FM designed to meet these local needs and interests as well as local public service announcements.

BBN will maintain a public file in High Point, NC, and will maintain a local toll free number for the benefit of High Point residents.

Grant of this waiver will, by reducing operating expense, enable BBN to improve its overall program production and make this waiver consistent with others where WYFQ is the primary station. Therefore, based on the above commitments, Bible Broadcasting Network, Inc., respectfully requests Commission consent to operate WHPE-FM, High Point, NC, as a satellite of WYFQ, Charlotte, North Carolina.¹

¹ BBN has successfully applied for and received main studio waivers for its full-power NCE stations. For example, waiver of Section 73.1125 was granted October 19, 2007, to BBN on similar facts to permit Station WYBY(AM), Cortland, NY, to operate as a satellite of Station WYFQ (See File No. BML-20070105AEY). See also File No. BLED-2011114AXC where a main studio waiver was granted for WYBA, Coldwater, MI, to operate as a satellite of WYFQ.