

WORKSHEET

2001 FEB 13 P 2:45

**FEDERAL COMMUNICATIONS COMMISSION**  
**WASHINGTON, D. C. 20554**  
February 12, 2001

**IN REPLY REFER TO:**

1800B3-MFW

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1220 19<sup>th</sup> Street, N.W.  
Washington, D.C. 20036

In re: **WKZM(FM), Sarasota, Fl**  
**Facility ID # 11307**  
**BPED-19991214AAZ**  
**Request for Waiver of 47 C.F.R. §73.1125**

Dear Mr. Southmayd:

The staff has under consideration the captioned request, filed on November 2, 1998 by The Moody Bible Institute of Chicago ("Moody") licensee of station WKZM(FM), Sarasota, Florida, for waiver of the Commission's main studio rule, 47 C.F.R. § 73.1125 in order to operate WKZM(FM) as a "satellite" of Moody's station WKES(FM), Lakeland, Florida.<sup>1</sup> For the reasons set forth below, we will grant Moody's request for waiver.

Pursuant to Section 73.1125, a station's main studio must be located either (1) within a station's principal community contour; (2) within the principal community contour of any other broadcast station licensed to its community; or (3) within 25 miles of the center of its community. *See Report and Order, Review of the Commission's Rules regarding the main studio and local public inspection files of broadcast and radio stations*, 13 FCC Rcd 15,691 (1998); *recon. granted in part*, 14 FCC Rcd 11,113 (1999) ("*Reconsideration Order*"). However, under Section 73.1125(b)(2), the Commission will waive this requirement where "good cause" exists the Commission will waive this requirement where "good cause" exists to do so and where the proposed studio location "would be consistent with the operation of the station in the public interest." Each waiver request by an NCE station seeking to operate as the satellite of another NCE station is considered on a case-by-case basis. The Commission has recognized the benefits of centralized operations for NCE stations, given their limited funding, and thus has found that "good cause" exists to waive the main studio location requirement where satellite operations are

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<sup>1</sup> A "satellite" station meets all of the Commission's technical rules, however, it originates no programming and instead rebroadcasts the parent station's programming. *See Amendment of Multiple Ownership Rules, Memorandum Opinion and Order*, 3 RR 2d 1554, 1562 (1964).

proposed. *Id.* In order to receive a satellite main studio waiver, an applicant must demonstrate that it will meet its local service obligation to satisfy the Section 73.1125 "public interest" standard. *Id.*

Moody's request is based on the economies of scale which would be realized by grant of its waiver, *i.e.*, avoiding the cost of equipping, operating, and staffing a main studio in the Sarasota, Florida area. We conclude that Moody has demonstrated "good cause" to waive 47 C.F.R. § 73.1125(a)(4) in these circumstances. As noted above, Moody proposes to operate WKZM(FM) as a satellite of co-owned station WKES(FM), Lakeland, Florida. The proposed WKES(FM) studio, at 5800 100<sup>th</sup> Way in St. Petersburg, is approximately 40 miles from Sarasota. Where there is a considerable distance between parent and satellite stations, we are particularly concerned that the licensee take adequate measures to maintain its awareness of the satellite community's needs and interests and respond to them in its programming. To that end, Moody has stated that it will: (1) ascertain the problems, needs, and interests of Sarasota through a local citizens advisory board consisting of Sarasota residents, which will meet periodically with Moody management; (2) supplement the efforts of the advisory board with a local Moody representative in Sarasota and through annual visits to Sarasota by an Moody management-level employee; (3) hold at least one well-advertised, open meeting in Sarasota each year to receive input from listeners and community leaders; and (4) address the problems, needs, and interests discerned by the advisory board, local representative, and periodic meetings in the news and public affairs programming aired on WKZM(FM). Moody also indicates that it will include regular news insertions in its local broadcasts on WKES(FM) in include segments of interest to residents of Sarasota. Finally, Moody states that it will provide for a toll-free telephone line from Sarasota to the WKES(FM) studio in and maintain its public file at the WKES(FM) studio, as required by Section 73.3527(b). In these circumstances, we are persuaded that Moody will meet its local service obligations and thus that grant of the requested waiver is consistent with the public interest.

Accordingly, in reliance upon the representations listed above, the request (File No. BPED-19991214AAZ) of The Moody Bible Institute of Chicago for waiver of 47 C.F.R. §73.1125 IS GRANTED.

Sincerely,

  
Linda Blair, Chief  
Audio Services Division  
Mass Media Bureau

cc: Lakeland Radio Fellowship Institute, Inc.