

ASSIGNEE'S REQUEST FOR WAIVER OF SECTION 73.1125(a) OF THE RULES

Christian Voice of Central Ohio, Inc. ("Christian Voice") respectfully requests waiver of Section 73.1125(a) of the Commission's rules, the main studio rule, for Stations WVXR, Richmond, Indiana and WVXW, West Union, Ohio; to be effective simultaneously with consummation of the assignment of these stations' licenses from Cincinnati Classical Public Radio ("CCPR") to Christian Voice. Good cause exists for grant of these waivers as described herein.

Both of the above-listed stations currently are used to retransmit programming broadcast on WVXU—another station licensed to CCPR. Both of these stations currently enjoy a type of "satellite" status that permits the location of their main studios at the main studio of parent station WVXU. *See* letter dated June 21, 2005, from H. Taft Snowden to Kenneth C. Howard, Jr. ("Snowdon Letter", copy attached).

Christian Voice intends to continue operating these stations as part of a regional satellite structure, to retransmit programming of the third station which is the subject of this assignment application – Station WVXC, Chillicothe, Ohio. Currently, WVXC also is a "satellite" of WVXU (*see* Snowdon Letter), but Christian Voice plans to construct a main studio at this station and to originate some programming from WVXC.

Although Christian Voice intends to continue operating Stations WVXR and WVXW as satellites, Christian Voice will continue to consider and assess all available options to maximize the stations' capability for serving their local communities. Like CCPR, Christian Voice is a noncommercial educational licensee and lacks the ability to provide financial support for local main studios for Stations WVXR and WVXW. Indeed, even undoing the current satellite status of Station WVXC and installing a main studio there is going to stretch thin Christian Voice's finances and be a continuing fiscal challenge.

Good cause for waiver of the rule exists under established Commission precedent because Christian Voice is a noncommercial educational licensee with limited funding and because grant of such waivers will permit Christian Voice to take advantage of centralized operations and benefit from economies of scale. Christian Voice commits to taking the following steps that--as the Commission has recognized--can permit a distant parent station to maintain its awareness of a satellite station's local community needs and interests:

- (1) A Christian Voice officer will contact civic and community leaders in each station's community on a quarterly basis by telephone to ascertain the needs and interests of its residents;
- (2) Christian Voice will recruit appropriate civic and community leaders in each station's community to join in the periodic telephonic meetings of its existing Community Advisory Board;

(3) Christian Voice will maintain an Internet site whereby the residents of each station's community can communicate directly with Christian Voice concerning programming and the local station's operation;

(4) Christian Voice will maintain a toll-free telephone line between each station's community and Christian Voice, by which residents can contact Christian Voice management;

(5) Christian Voice will periodically broadcast public affairs programming responsive to the local issues of public concern to each community's residents; and

(6) Christian Voice will maintain an up-to-date copy of each station's public file in its local community (as well as maintain all the stations' public files at the main studio of parent station WVXC).

Christian Voice's commitment is fully consistent with commitments offered in connection with other main studio waivers for noncommercial stations. *See, e.g.,* Snowdon Letter, p.3; *Delmarva Educational Association for a new FM Broadcast Station at Cheriton, Virginia, et al*, 19 FCC Rcd. 6793, ¶¶ 11-12 (2004); *Letter to Jeffrey D. Southmayd from Peter H. Doyle, Chief, Audio Division (WVML(FM))*, 2002 FCC Lexis 6524 (released December 10, 2002).

For the above-described reasons, good cause exists to grant the requested waiver of Section 73.1125(a) and permit Stations WVXR and WVXW to collocate their main studios with the main studio of parent Station WVXC, effective simultaneously with consummation of the license assignments proposed in this application.