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Via Hand Delivery

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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

JUN 14 2017

Federal Communications Commission
Office of the Secretary

*Re Main Studio Waiver Request
Port Allen Educational Broadcasting Foundation
FRN: 0001716125
WPAE (FM), Centreville, MS; Facility Id: 53026
KPAE (FM), Erwinville, LA; Facility Id: 53023*

Dear Ms. Dortch:

Port Allen Educational Broadcasting Foundation ("PAEBF") is the licensee of non-commercial educational FM stations WPAE(FM), Centreville, Mississippi (Fac. Id. 53026) and KPAE(FM), Erwinville, Louisiana (Fac. Id. 53023). On October 23, 2012, the Commission granted a waiver of Section 73.1125 of the Commission's rules (the "Main Studio Rule") to permit PAEBF to locate KPAE's main studio approximately 43 miles away in Centreville, Mississippi at the main studios for station WPAE. Due to a planned operational reorganization, PAEBF now requests that the main studio waiver be switched – that PAEBF be permitted to locate WPAE's main studio approximately 29 miles as the crow flies (39 miles via automobile) away in Zachary, Louisiana along with the main studio for station KPAE. In making this waiver request, we are providing the Commission with information appropriate for a finding of "good cause" and that the grant of the waiver in this circumstance will be, pursuant to Section 73.1125(b)(2), "...consistent with the operation of the station in the public interest."

PAEBF currently operates KPAE as a satellite station from 122 E. Main Street, Centreville, Mississippi, the main studio for PAEBF's station WPAE. PAEBF proposes instead to operate WPAE as a satellite station from 11950 Milldale Rd, Zachary, Louisiana, the new main studio for KPAE. This location is only 29 miles away from the designated reference coordinates for the licensed community of Centerville, Mississippi. The operation of WPAE from KPAE's studios will continue to generate valuable economies of scale and cost savings allowing PAEBF to maintain high quality non-commercial educational programming in both Erwinville and Centreville. Maintaining a separate studio location with staff for WPAE will place a serious financial burden on PAEBF and is diverting limited resources away from both stations.

Ms. Marlene Dortch

June 14, 2017

Page 2

As it already does, PAEBF will have frequent contact and work closely with an established network of individuals in the Centreville community who share PAEBF's values. This ongoing and open channel of communication will act as a bridge between the Centreville community and PAEBF's programming personnel. These individuals will be charged with assisting PAEBF personnel in determining the needs, problems and concerns of Centreville listeners. PAEBF already maintains a toll-free telephone number and will continue to do so as required by Section 73.1125(e) of the Commission's rules. Should the proposed move be approved, the public inspection file for WPAE will be maintained at KPAE's main studio. PAEBF commits to make reasonable accommodation to listeners wishing to examine the public inspection file.

The Commission traditionally considers waiver requests by NCE stations on a case-by-case basis. For non-commercial waiver requests, the Commission has expressly found "good cause" to exist in numerous instances based solely on a showing that centralized operations will provide economic benefit to non-commercial stations, provided that the local service obligations are met.

Although this request seeks a waiver to locate KPAE's main studio approximately 4 miles outside of the 25-mile radius in the Main Studio Rule, such distances beyond the 25-mile radius are not unusual for NCE radio stations which have been granted main studio waivers. In fact, some grants have permitted the main studio to be located more than 1,000 miles away.

As set forth above, good cause exists for the waiver of the Main Studio Rule in this case. Further, allowing PAEBF to focus its resources on one main studio will allow it to provide more and enhanced programming to better serve the public interest. This distance waiver is fully "consistent with the operation of the station in the public interest."

PAEBF requests that the Commission find, pursuant to Section 73.1125(b)(2) of its rules, that the public interest will be served by the location of WPAE's main studio in Zachary, Louisiana and authorize PAEBF to locate WPAE's main studio outside the station's principal community contour, outside the contour of any other broadcast station licensed to Centreville, Mississippi and more than 25 miles from the reference coordinates of the center of Centreville, Mississippi.

Please do not hesitate to contact me if you have any questions.

Very truly yours,



Mark A. Balkin