

Exhibit 6

REQUEST FOR WAIVER OF THE MAIN STUDIO RULE

In connection with this application to modify the license of Station WGPB, Rome, Georgia, to change its status from a commercial to a noncommercial educational radio station, Georgia Public Telecommunications Commission (“GPTC”) also requests a waiver of Section 73.1125 of the Commission’s rules, 47 C.F.R. § 73.1125, to designate GPTC’s headquarters at 260 14th Street, N.W., Atlanta, Georgia, as the main studio location for Station WGPB.

GPTC is an agency of the State of Georgia charged with providing educational, public broadcasting and related services to the residents of the State. Except for four stations that originate some local programming, GPTC operates its existing fifteen FM stations as a single public radio network,¹ originating its radio programs from its Atlanta master origination facilities. The radio network offers National Public Radio programming, as well as local music and news programming. Popular local programs include Night Music from WUGA; the Jazz Spot, featuring the best classic and contemporary jazz artists; the Green Island Radio Show from WSVH; and GPB’s monthly book club Cover to Cover.

The majority of GPTC’s employees are based at its Atlanta headquarters, and, except for the employees at the four radio stations that offer some local programming, the GPTC personnel based in areas outside of Atlanta are primarily technical personnel.

¹ GPTC is also the licensee of nine noncommercial educational television stations, which it operates as a single public television network. Collectively, the two networks are known as Georgia Public Broadcasting (“GPB”).

GPTC has centralized its operations at the Atlanta headquarters principally for financial reasons as budgetary constraints have precluded it from maintaining staffs at each of the various stations. The Commission has granted GPTC's requests for waiver of the main studio rule for several of its stations² and waiver requests remain pending for the others.

GPTC plans to operate this station in the same manner as its other radio stations. Grant of this request will enable GPTC to take advantage of technological innovations that permit remote control of the stations, to make better use of its limited resources, and to realize substantial cost savings. Complying with the main studio requirement, including maintaining equipment to originate programming and employing at least one manager and one staff-level employee at Station WGPB's studio, would impose significant additional costs on GPTC and limit its ability to devote its limited resources to providing interesting and innovative programming to residents throughout the State of Georgia. As indicated in the supplement to the granted waiver requests, GPTC estimates that grant of this waiver will save it over \$200,000 per year in operating expenses and a approximately \$80,000 in capital costs.³

The Commission has long recognized the financial difficulties noncommercial educational licensees have in satisfying the main studio requirements and the benefits that such stations realize by centralizing operations. Thus, the Commission has indicated that it will grant waivers of the main studio requirements on a case-by-case basis, based upon

² See, e.g., FCC File No. 20060223ACQ, gtd. 10/11/07.

³ See Letter dated Nov, 17, 2006 from Nancy G. Hall, Executive Director, GPTC to Ms. Marlene H. Dortch, Secretary, Federal Communications Commission. FCC File No. 20060223ACQ, gtd. 10/11/07.

a showing that the licensee will continue to serve the needs of its communities of

license.⁴ In order to continue to meet these requirements, GPTC will

- maintain a copy of the public inspection file in Rome, Georgia, the station's community of license, and will make the file available upon request to members of the public who wish to review its contents;
- maintain a toll-free telephone number, and publicize that number on its website, so that residents of the Rome community may contact the GPTC headquarters, without charge, to share local views with the GPTC staff;
- include a function on its website to allow listeners to share their views with the GPTC staff; and
- make efforts to reach out to listeners and viewers in the Rome community.

Accordingly, grant of this waiver request will serve the public interest. It will permit GPTC to deliver quality public radio service to residents of the Rome, Georgia, area through centralized operations, realize substantial cost savings through these centralized operations, and devote additional resources to the production of state and local radio programming. At the same time, this waiver request demonstrates that GPTC is committed to serving the needs of the Rome community and will implement measures to ensure that, in the absence of a local main studio, GPTC will continue to serve the Rome community.

For the reasons discussed above, GPTC requests that the Commission waive Section 73.1125 of the Commission's rules and permit GPTC to designate its

⁴ *In re Amendment of Sections 73.1125 and 73.1130 of the Commission's Rules, the Main Studio and Program Origination Rules for Radio and Television Broadcast Stations*, Memorandum Opinion and Order, 3 FCC Rcd. 5024 ¶ 30 (1988).

headquarters at 260 14th Street, N.W., Atlanta, Georgia, as the main studio for Station WGPB.