

**MAIN STUDIO WAIVER REQUEST**  
**MINNESOTA PUBLIC RADIO**

On February 24, 2017, Red Rock Radio Corp. filed an application (FCC File No. BALH-20170224AAP) seeking Commission consent to the assignment of license for Station KZIO in Two Harbors, Minnesota, Facility ID No. 68610 to Minnesota Public Radio (“MPR”). Upon consummation of the assignment, MPR will operate KZIO as a noncommercial station.

MPR hereby seeks a waiver of Section 73.1125(a) of the Commission’s rules to permit MPR to use the studios of MPR’s noncommercial station KCMP, Facility ID No. 62162, Northfield, Minnesota as the main studio for KZIO. Pursuant to 47 CFR §73.1125(d)(2), MPR believes that good cause exists to permit KZIO to operate as a satellite of KCMP.

In addition to being the licensee of KCMP, MPR is the licensee of 44 noncommercial stations spread across Minnesota, Iowa, Idaho, Michigan and South Dakota. Multiple of these stations are currently operating pursuant to a main studio waiver. MPR asks that KZIO be given the same status, so as to permit MPR to continue the service now provided by KZIO and to extend the eclectic mix of music, news, information and cultural programming MPR currently provides to new listeners.

MPR is committed to providing high quality educational programming to the citizens of Two Harbors and the KZIO service area even though economic realities preclude the establishment of a separate, fully staffed separate main studio for KZIO in the geographic area defined by Section 73.1125(a) of the Commission’s rules. To help ensure that MPR will remain attuned to the needs and interests of Two Harbors, MPR will determine those needs and interests by a variety of methods and will respond to them in its programming. Specifically, MPR will:

- Establish a toll free telephone number to permit the public to reach the Main Studio without charge;
- Host its public file online;
- Regularly conduct ascertainties of community needs each quarter in the proposed service area; and
- Subscribe to local newspapers and publications.

Using the KCMP studios as the main studio for KZIO will enable MPR to provide high quality noncommercial programming to an expanded audience. The Commission has previously “recognized the benefits of centralized operations for noncommercial educational stations, given the limited funding available to these stations” and has granted waivers of the main studio rule to permit such centralized operations. *Main Studio and Program Origination Rules*, 3 FCC Rcd. 5024, 5027 (1988). See also *Michael Couzens*, 27 FCC Rcd. 7670 (MB 2012).

Waiver of 47 C.F.R. §73.1125(a) is thus in the public interest. MPR respectfully requests that the waiver be granted.