

**FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D. C. 20554**

NOV 19 1996

IN REPLY REFER TO:
1800B3-ALM

Joseph E. Dunne III, Esq.
Suite 304
1000 Thomas Jefferson Street, N.W.
Washington, D. C. 20007

Re: New FM Service in Barre, Vermont, WCMD(FM), BLED-960416KA

Dear Mr. Dunne:

The staff has under consideration the application of Christian Ministries, Inc. ("CMI") for a license to cover the construction permit for new noncommercial educational ("NCE") FM station WCMD(FM), Barre, Vermont (File No. BLED-960416KA). CMI has requested a waiver of the Commission's main studio requirement, see 47 C.F.R. § 73.1125, in order to operate the Barre station as a satellite of its NCE station WCMK, Bolton, Vermont.¹ For the reasons set forth below, we will waive 47 C.F.R § 73.1125 and grant CMI's application for a license to cover its construction permit.

Section 73.1125(a) requires each broadcast station to maintain a main studio within the station's principal community contour to ensure that the station will serve the needs and interests of the residents of its community of license. Amendment of Sections 73.1125 and 73.1130, 3 FCC Rcd 5024, 5027 (1988). However, under Section 73.1125(a)(4), 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 found "good cause" exists to waive the main studio location requirement where satellite operations are proposed. Id. A satellite station must, however, demonstrate that it will meet its local service obligation to satisfy the Section 73.1125 "public interest" standard. Id.

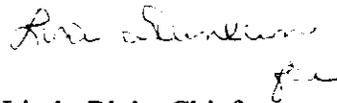
CMI's request is based on the economies of scale which would be realized by grant of its waiver. We agree and conclude that there is "good cause" to waive 47 C.F.R. § 73.1125(a)(4) in these circumstances. CMI proposes to operate the Barre station as a satellite of WCMK(FM), Bolton, Vermont, approximately 25 miles from Barre. The Commission expects the licensees of a satellite station to take adequate measures to maintain its awareness of the satellite community's needs and interests. To that end, CMI has pledged

¹A "satellite" 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 RR2d 1554, 1562 (1964).

to: (1) Ascertain the problems, needs and interests of Barre and the station's service area; (2) the ascertainment will be conducted by local representatives of CMI; (3) members of CMI's board of directors and management-level employees of CMI will periodically visit Barre; and (4) CMI will maintain a toll-free telephone number between Barre and the WCMD(FM) main studio in Bolton, Vermont. We also remind CMI that it must maintain a public file for the new station in Barre, as required by 47 C.F.R. § 73.3527(d). In these circumstances, we are persuaded that CMI will meet its local service obligations and thus, that grant of the requested waiver is consistent with the public interest.

Accordingly, the application of Christian Ministries, Inc. for a license to cover the construction permit of WCMD(FM), BLED-960416KA, and its request for waiver of 47 C.F.R. § 73.1125 ARE GRANTED. The authorization will be forwarded under separate cover.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Blair".

**Linda Blair, Chief
Audio Services Division
Mass Media Bureau**