

Request for Waiver of the Main Studio Rule

Network of Glory, LLC (“NOG”), applicant for a new FM station proposing operations on Channel 210 in Manhattan, Kansas, pursuant to Section 73.1125(b)(2) of the Commission’s Rules, hereby requests a waiver of the main studio rule to operate the new FM station as a satellite of NOG’s proposed new NCE FM station in Clinton, South Carolina. Contemporaneously with this filing, NOG has filed nine other new NCE FM applications, one of which proposes operations on Channel 220 in Clinton, South Carolina.

The Commission has stated previously that the “main studio must, at a minimum, maintain full-time managerial and full-time staff personnel.” *Jones Eastern of the Outer Banks, Inc.*, Memorandum Opinion and Order, 6 FCC Rcd 3615, ¶ 9 (1991); *see also Salem Broadcasting, Inc.*, 6 FCC Rcd 4172 (1991). Given the cost of maintaining at least two full-time employees, however, NOG, a small town ministry functioning with a low operating budget, simply cannot economically support a separate main studio in Manhattan, Kansas. Permitting satellite operation with a main studio located at NOG’s proposed Clinton, South Carolina station, would allow NOG to realize substantial cost savings, which are critical in order for NOG to fulfill its educational mission as a nonprofit religious broadcaster.

The FCC previously has acknowledged the advantages accruing to noncommercial broadcasters from consolidated operations:

The Commission has recognized the benefits of centralized operations for NCE stations, given their limited funding, and thus has found good cause exists to waive the main studio location requirement where satellite operations are proposed.

Delmarva Educational Association, Memorandum Opinion and Order, 19 FCC Rcd 6793, ¶ 11 (2004); *see Main Studio and Program Origination Rules*, 3 FCC Rcd 5024, 5027 (1988). NOG respectfully submits that a similar result is warranted here. Indeed, granting a waiver of the main studio rule in this case is fully consistent with the Commission’s treatment of other noncommercial educational broadcasters comparable to NOG. *See, e.g., Delmarva Educational Association*, 19 FCC Rcd 6793 (granting a waiver of the main studio rule for a noncommercial radio station).

NOG will satisfy the needs and interests of the residents of Manhattan, Kansas by the following means:

First, NOG is aware of and will maintain an awareness of its obligation to serve the needs and interests of the Manhattan, Kansas community of license.

Second, NOG will maintain a toll free telephone line by which the residents of Manhattan, Kansas can reach NOG management to express

concerns about station operation. This action will be taken consistent with Section 73.1125(e) of the Commission's rules.

Third, NOG will contact the community leaders of Manhattan, Kansas on a routine basis, either in person or by telephone, to ascertain the needs and interests of the Manhattan, Kansas area and, to the extent practicable, will provide programming specifically addressing those needs and interests. Such programming will include coverage of local news and events occurring in the Manhattan, Kansas area.

Fourth, NOG maintains an Internet site on the World Wide Web (www.networkofglory.org) whereby the residents of Manhattan, Kansas can communicate directly with NOG concerning the proposed station's programming and operation.

Based on the foregoing, NOG submits that: (1) good cause exists to waive the main studio requirements under these circumstances; (2) NOG will be able to ascertain and satisfy the interests and need of the residents of Manhattan, Kansas; and (3) a waiver of the main studio requirements is in the public interest. Accordingly, NOG respectfully requests that the Commission grant its request for waiver of the main studio rule in order to permit the operation of the proposed noncommercial educational station as a satellite of NOG's proposed NCE FM station in Clinton, South Carolina.¹

¹ In the event that the Commission denies NOG's application for a new NCE FM station in Clinton, South Carolina, NOG will designate another community from among the proposals granted by the Commission in which the company will construct and maintain a main studio.