

## EXHIBIT 13

### **Request for Modification of Main Studio Waiver Grant** **Station KSWs(FM), Chehalis, WA (Facility ID: 81162)**

Washington State University (“WSU”) was granted a waiver of Section 73.1125 of the FCC’s Rules for new noncommercial educational (“NCE”) Station KSWs(FM), Chehalis, Washington in FCC File No. BPED-19960325MD. In accordance with the station’s original 1996 permit application, the waiver grant authorizes KSWs to operate as a satellite of co-owned NCE Station KFAE-FM, Richland, Washington. WSU now requests a modification of the waiver grant to specify operation as a satellite of a different WSU Station: KWSU(AM), Pullman, Washington (Facility ID 71025).

WSU is the licensee of fifteen noncommercial educational radio stations located in Washington state and Idaho, and is the permittee of three new noncommercial educational FM stations. Of the fifteen WSU radio stations located outside of the Pullman, Washington area – which is home to WSU’s main campus and its Northwest Public Radio Network headquarters and studio – all but KFAE currently operate (or will operate) under waiver grants as satellite stations without main studios in the communities of license.

On August 5, 2009, however, WSU filed a request to obtain a main studio waiver for KFAE, the only station outside of its regional headquarters that is not already authorized as a satellite. As a result of WSU’s plans to convert KFAE to a satellite operation without a fully staffed local studio in Richland, WSU also now seeks to change the satellite status of its stations which previously specified KFAE as their hub station. In the case of KSWs, WSU submits the instant request to change KSWs from a satellite of KFAE to a satellite of KWSU(AM). WSU therefore seeks to maintain the existing satellite status of KSWs, as authorized by the station’s prior main studio waiver grant, with the exception of change to the main studio location from Richland (site of KFAE) to Pullman (site of KWSU). WSU will still operate KSWs as a satellite in its Northwest Public Radio Network, and the change is simply necessitated by WSU’s decision to consolidate the KFAE main studio with that of all of its other stations at its Pullman headquarters.

Despite this change in originating station, WSU submits that the representations and justifications underlying KSWs’s existing main studio waiver will continue to apply. Specifically, it remains the case that a stand-alone operation in Chehalis could not offer the quality and quantity of program offerings that KSWs will bring to the region as a satellite station that can take advantage of the economies of scale permitted by the use of a consolidated main studio. Moreover, it remains the case that WSU and Northwest Public Radio will operate KSWs as part of an integrated noncommercial radio network that provides Washington state residents with unique noncommercial broadcasting at a cost which can be supported by the station’s licensee.

In addition, WSU and Northwest Public Radio will still work to ascertain community needs in Chehalis by: providing a toll-free telephone number for Chehalis residents to contact WSU’s studios in Pullman; reviewing local Chehalis newspapers and other local news resources and media; utilizing staff reporters to cover news in the Chehalis area and distributing that

information regionally through its affiliation with the Northwest News Network; maintaining an up-to-date web site at [www.nwpr.org](http://www.nwpr.org) which enables listeners to comment on programming and obtain extensive information about WSU's radio network schedules, programs, and events; seeking feedback from its listeners through the radio network's monthly e-newsletter; and being active in the community with dedicated coverage relevant to its listeners in the area and contact with local officials.

For all of these reasons, the change in originating station will not affect the manner in which KSWS's satellite operation promotes the public interest. Thus the currently authorized satellite operation will still allow WSU to provide the highest quality and variety of public radio offerings to the Chehalis community consistent with the realities of funding for public broadcasting. The Commission has stated that "[w]e have recognized the benefits of centralized operations for noncommercial educational stations, given the limited funding available to these stations, and we have granted waivers to state and regional public television and radio networks to operate 'satellite' stations that do not necessarily meet the requirements of a main studio," subject to a showing of good cause why the Commission should grant such a waiver. *In re Main Studio and Program Origination Rules for Radio and Television and Television Broadcast Stations*, Memorandum Opinion and Order, 3 FCC Rcd 5024 (1988).

Accordingly, WSU respectfully requests a modification to its grant of a waiver of Section 73.1125 of the Commission's rules, to specify that KSWS will operate as a satellite of KWSU(AM), Pullman, Washington.