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August 1, 2016

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Accepted / Filed

AUG - 1 2016

Federal Communications Commission
Office of the Secretary

Re: Main Studio Waiver Request
Santa Monica Community College District
KJRW(FM)
Facility ID Number 63523
Los Osos-Baywood Par, California

2016 AUG - 2 A 10:41
RECEIVED

Dear Ms. Dortch:

On July 22, 2016, EDB VV License LLC ("EDB") filed an application (File No. BALH-20160722ABO) seeking Commission consent to the assignment of license for Station KJRW, Los Osos-Baywood Par, California ("Los Osos") to Santa Monica Community College District ("SMC"). Upon consummation of the assignment, SMC will operate KJRW as a noncommercial station.

SMC hereby seeks a waiver of Section 73.1125(a) of the Commission's rules to permit SMC to use the studios of SMC's noncommercial Station KCRW, Santa Monica, California, as the main studio for KJRW. Good cause exists to permit SMC to operate KJRW as a repeater station for KCRW.

In addition to being the licensee of KCRW, SMC is the licensee of noncommercial stations KCRI, Indio, California; KCRU, Oxnard, California; KDRW, Santa Barbara, CA; and KCRY, Mojave, California. KCRI, KCRU, KDRW and KCRY operate pursuant to main studio waivers that permit those stations to serve as satellites of KCRW. SMC asks that KJRW be given the same status, so as to permit SMC to continue the service now provided by KJRW and



to extend the eclectic mix of music, news, information and cultural programming SMC currently provides to new listeners.

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

- Monitor local newspapers, print publications and on-line news services and include in its programming coverage of local news and cultural events in the area in and around Los Osos;
- Have station personnel make periodic visits to the Los Osos area;
- Regularly ascertain community needs by various methods, including by contacting local public officials and by seeking input from SMC's Community Advisory Board, which will be directed to include Los Osos and the KJRW coverage area in its ascertainment assessment. SMC will take those ascertained needs and interests into account in developing programming to be aired on KJRW;
- Maintain a toll free telephone number and e-mail address to permit the public to reach the KCRW Studios without charge;
- Make available to persons within the KJRW service area photocopies of documents in the KJRW public file. Such copies shall be provided upon telephone or e-mail request, without postage charge; and
- Mail the most recent version of "The Public and Broadcasting" to any member of the public who requests a copy.

Using the KCRW studios as the main studio for KJRW will enable SMC 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).



G A R V E Y S C H U B E R T B A R E R

Ms. Marlene H. Dortch
August 1, 2016
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Waiver of 47 C.F.R. §73.1125(a) is thus in the public interest. SMC respectfully requests that the waiver be granted.

Sincerely,

A handwritten signature in blue ink, appearing to read 'John Crigler', is written over the printed name.

John Crigler

JC:cll

cc: Michael Wagner, Esq. (pdf copy via email to Michael.Wagner@fcc.gov)