

**EXHIBIT 15**  
**REQUEST FOR WAIVER**

VCY/America, Inc. (“VCY”), Permittee of Noncommercial educational radio station WJTJ(FM), Cameron, Missouri (Facility ID No. 172360) (“WJTJ”), hereby requests a waiver of section 73.1125 of the Commission’s Rules in order to operate WJTJ as a satellite without a main studio in Cameron. The Commission previously has recognized the advantages accruing to Non-commercial broadcasters from consolidated operations:

“In the past, we 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.”

*Main Studio and Program Origination Rules*, 3 FCC Rcd 5024, 5027 (1988). Further, the Commission has recognized that waivers of the main studio rule are often necessary so that “the savings realized by [granting a waiver of the main studio rule] can be better utilized to assist [the station] with providing quality programming and educational opportunities.” *WPSX-TV, WPSX-DT, Clearfield, Pennsylvania*, 20 FCC Rcd 10903 (2005). VCY respectfully submits that a similar result is warranted here.

VCY is a non-stock, not-for-profit corporation organized for the purpose of providing educational, religious, and family programming to listeners in Wisconsin, Kansas, South Dakota, Illinois, Michigan and other areas of the United States. VCY’s educational objectives include providing religious instruction and moral teaching; offering solutions to community problems such as teenage pregnancy, drug and alcohol abuse, and crime; and helping troubled youth to find meaningful and productive lifestyles. Additionally, VCY teaches citizenship, patriotism, peaceful conflict resolution and religious principles.

VCY operates a network of broadcast stations that provide programming designed to advance VCY’s educational objectives. Sharing in the programming resources available through the VCY network enables WJTJ to offer valuable programming to the people of Cameron. The cost of maintaining at least two full-time employees, however, would force VCY to direct resources from its programming initiatives. Due to the limited population in the proposed station’s service area, it will be necessary for the station to function with a low operating budget. VCY simply cannot economically support a main studio in Cameron, a town with a small population (8,312 according to the 2000 Census), under the personnel standards articulated by the Commission.

The Commission previously has granted VCY’s requests for waiver of the main studio rule, recently authorizing, for example, operation of VCY noncommercial station WJIC(FM), Zanesville, Ohio, as a network satellite, under almost identical

circumstances.<sup>1</sup> The letter granting the request found: (1) that the economies achieved by centralized operation of VCY's noncommercial stations constituted "good cause" for waiver of Section 73.1125; and (2) that VCY has taken adequate steps to ensure satisfaction of the local service obligations of its satellite stations, consistent with the public interest. See Letter of Peter H. Doyle, Chief, Audio Services Division, Mass Media Bureau to VCY/America, Inc., October 31, 2001. The economies achieved by centralized operation of WJIC(FM) are comparable to the economies to be achieved by operation of WJTJ as a satellite of the VCY network. In addition, as detailed below, VCY has a well-developed infrastructure for ensuring that the local service obligations of stations operated as satellites of its network are ascertained and met. By granting the instant waiver request, the Commission will merely be extending VCY's authority to operate in a manner the Commission has previously determined serves the public interest.

As it has with respect to other stations for which a waiver of the rule has been granted, upon grant of this request, VCY will satisfy the needs and interests of residents of Cameron, Missouri by the following means:

First, VCY maintains a toll free telephone line by which the residents of the community can reach VCY management to express concerns about station operation. This action is taken consistent with Section 73.1125(c) of the Commission's rules.

Second, VCY maintains a web page which permits listeners throughout the VCY network and beyond to have input regarding the programming broadcast on VCY stations.

Third, VCY has established a regional advisory council to gather input on programming issues of interest to residents of the communities served by its network and to communicate that information to management. VCY includes at least one resident of each of these communities on the council and is currently working to add a council member for Cameron to ensure that the views of residents of that community are represented.

Fourth, VCY will ascertain the needs of Cameron, as it does the needs of other communities served by the VCY network, through an issue-oriented and truly

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<sup>1</sup> In previous waiver requests, VCY has described how programming is distributed throughout the VCY noncommercial network. The network signal originates with VCY flagship station WVCY-FM, Milwaukee, Wisconsin - a station licensed and operating on a noncommercial basis and providing noncommercial programming to the residents of Milwaukee. The VCY network signal is transmitted via satellite. The vast majority of programming provided to the stations over the VCY network satellite feed is the same as that broadcast on WVCY-FM, although the satellite feed does not contain certain local Milwaukee programming. VCY will distribute programming to KVCS in the same manner. WJTJ's authorized transmitter site in Cameron, MO is located approximately 376 miles from WVCY's authorized facilities in Milwaukee, WI.

interactive programming format which relies upon direct community involvement in the form of on-air listener calls.

Fifth, VCY will provide local programming such as the weekly “Bulletin Board” program, which provides information about community events in the service area of individual VCY stations, and will include information about community events in Cameron.

Sixth, VCY conducts three annual “share-a-thon” fundraisers. Prior to each share-a-thon, listeners receive a letter, which thanks contributors and solicits input on programming.

Seventh, VCY will actively use the internet and other media sources when developing its quarterly issues list for Cameron, Missouri

In sum, VCY believes that operation of WJTJ as a satellite of the VCY network is an economically sensible way of meeting the community’s demand for high-quality, noncommercial programming while enabling VCY to best use its resources. Granting a waiver of the main studio rule in this case is fully consistent not only with the Commission’s prior actions with respect to other VCY stations, but also with its treatment of other regional noncommercial entities comparable to VCY. See, e.g., Letter of Dennis Williams, Chief, FM Branch, Audio Services Division, Mass Media Bureau to Mars Hill Broadcasting Co., Inc., August 18, 1992 (granting a waiver of the main studio rule covering two of the radio stations held by a regional non-commercial entity); Letter of Larry D. Eads, Chief, Audio Services Division, Mass Media Bureau to Minnesota Public Radio, January 2, 1992 (granting a waiver of the main studio rule covering seven of the radio stations held by a regional non-commercial entity).

For the foregoing reasons, VCY respectfully requests that the Commission grant this request for waiver of Section 73.1125 of its rules.