

**Request for Waiver of Main Studio Location Rule
KOKN, Oketo, KS (FIN: 177208)**

South Central Oklahoma Christian Broadcasting, Inc. ("SCOCBI") hereby requests a waiver of Section 73.1125 of the FCC's Rules with respect to its proposed operation of station KOKN, Oketo, KS (FIN:177208) (the "Station"). SCOCBI respectfully requests Commission authorization to operate the Station as a satellite of co-owned noncommercial educational FM broadcast station KTGS and to co-locate the Station's main studio at KTGS(FM)'s main studio.

Commission precedent and good cause support the requested waiver and it would be in the public interest for the Commission to grant this request. SCOCBI intends to deliver its signal from KTGS (FM) to the Station facility in Oketo, KS through combination of microwave links and data lines.

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,"¹ subject to a showing of good cause.

SCOCBI submits that operation of the Station as a satellite of KTGS and without a separate main studio in Oketo, Kansas will serve the public interest. Permitting SCOCBI to operate the Station from the existing main studio of KTGS will allow it to conserve scarce resources and prevent unnecessary duplication of equipment and personnel. SCOCBI is an Oklahoma not-for-profit corporation. As the Commission is aware, there are substantial costs associated with construction, operation, and maintenance of a main studio, including those attributable to equipment purchase, personal wages, and facility rent and utilities. Because SCOCBI intends to originate the vast majority of the Station's programming from KTGS, virtually all of these costs can be saved if SCOCBI's requested waiver is granted. SCOCBI proposes to use these cost

¹ *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).

savings to more fully equip and staff its KTGS studio and its Tishomingo, Oklahoma broadcast production facility, where senior SCOCBI management and experienced staff personnel will be available, as well as focus on maintaining a professional broadcast facility in Oketo. Co-locating the main studio for the Station at the KTGS(FM) main studio in Tishomingo, Oklahoma will enable SCOCBI to attain the economies of scale and cost savings necessary to maintain the high quality of its proposed noncommercial educational programming.

SCOCBI relies on the contributions from the public for its operation. The City of Oketo as of the 2010 census has a population of only 66 and is highly unlikely to be able to support the costs of operating a full main studio in addition to the normal ongoing operating expenses of the Station.

SCOCBI is aware of the Station's local service obligations. SCOCBI has developed a plan to allow it to determine the local needs of the Oketo community and respond to those needs. Specifically, SCOCBI proposes to take the following steps in order to ensure that it ascertains and responds to the problems, needs and interests of the local community:

- Solicit local volunteers to assist SCOCBI in ascertaining issues of local importance and providing programming that addresses the needs and interests of the Oketo community;
 - Provide programming targeted to Oketo, including coverage of significant local news or cultural events;
 - Ascertain the needs and interests of the Oketo community on an on-going informal basis using local volunteers and conduct formal ascertainment at least once annually to ensure that the station is providing adequate coverage of issues of local importance and is providing programming that addresses the needs and interests of the Oketo community;
-

- Broadcast public service announcements of local interest provided by national, state and local organizations;
- Announce on-air a website which will allow for the submission of comments from local listeners, as well as a toll-free telephone number in compliance with Section 73.1125(e) of the Commission's Rules; and
- In accordance with Commission requirements, establish and maintain a duplicate public file in Oketo, which will be updated when new material is added to the public file in Tishomingo, Oklahoma.

As shown herein, SCOCBI is committed to ascertaining the local problems, needs and interests of Oketo, KS and has demonstrated that it will satisfy its local service obligations. SCOCBI's commitment and this demonstration, in conjunction with the limited funding and economies of scale present in this case, support a finding by the Commission that good cause exists for the requested waiver and that a grant of the waiver would be in the public interest.