

**MAIN STUDIO WAIVER REQUEST**

Proposed assignee Texas Public Radio (“TPR”) hereby seeks a waiver of 47 CFR §73.1125(a) of the Commission’s rules so that upon closing on the proposed assignment, can use the studios of KSTX(FM) and KPAC(FM), both licensed to, and located in, San Antonio, Texas, as the main studio for the subject station KCTI(AM), Gonzales, Texas.

As contemplated by 47 CFR §73.1125(b)(2), and as demonstrated below, good cause exists to locate the KCTI(AM)’s main studio at a location other than that specified in Section 73.1125(a) and such operation would be consistent with the public interest.

TPR is the licensee of KSTX(FM) and KPAC(FM). TPR is the NPR affiliate in San Antonio and largely programs KSTX(FM) with programming from NPR and other news and information sources and with news and information programming produced by TPR itself. TPR largely programs KPAC(FM) with classical music programming. The Commission previously has granted TPR a waiver of Section 73.1125(a) to permit TPR to use its San Antonio studios as the main studio for KTXI(FM), Ingram, Texas with programming from both KSTX(FM) and KPAC(FM). See BLED-19980922KH. More recently, the Commission has granted TPR a waiver of the main studio rule so as to permit TPR to also program KTPR(FM), Snyder, Texas, and KVHL(FM), Llano, Texas, from TPR’s San Antonio studios, both rebroadcasting primarily KSTX(FM) programming. See FCC File Nos. 20130128AOZ and 20150108ABV, respectively.

Accordingly, TPR seeks a waiver to operate KCTI(AM), Gonzales, Texas as a satellite of co-owned noncommercial educational station KSTX(FM), San Antonio, Texas, rebroadcasting primarily KSTX(FM) programming.

TPR, which is a not-for-profit corporation organized under the laws of the State of Texas, is committed to the goal of providing high quality educational programming to all of the citizens of the proposed community of license even though economic realities preclude maintaining a separate main studio for KCTI(AM) in the geographic area defined by Section 73.1125(a) of the Commission’s rules. To help ensure that TPR will remain attuned to the problems, needs and interests of Gonzales and the KCTI(AM) coverage area, TPR will determine those problems, needs and interests by a variety of methods and will respond to them in its programming.

Specifically, TPR will:

- Subscribe to local newspapers and publications in order to cover local news and cultural events in the area around the proposed community of license;
- Have station personnel make periodic visits to Gonzales;
- Conduct ascertainties of community needs in the proposed community of license, including by contacting public officials, and taking the ascertained needs and interests into account in developing programming;

- Continue to maintain a webpage whereby Gonzales residents can provide feedback on station programming;
- Maintain a toll free telephone number and e-mail address to permit the public to reach the TPR San Antonio studios without charge; and
- Maintain a Public Inspection File in Gonzales.

Co-locating the KCTI(AM) studio with the KSTX/KPAC studios will enable TPR to provide high quality noncommercial public affairs and educational programming to a significantly expanded and unserved audience. The Commission has previously “recognized the benefits of centralized operations for non-commercial educational stations, given the limited funding available to these stations, and [has] granted waivers to ...regional public television and radio networks...” *Amendment of Sections 73.1125 and 73.1130*, 3 FCC Rcd. 5024, 5027 (1988).

This request for a waiver of 47 CFR §73.1125(a) is thus in the public’s best interest, convenience, and necessity and TPR respectfully requests that it be granted.