

EXHIBIT 13

MAIN STUDIO RULE WAIVER

This will request a waiver of the Commission's main studio requirement embodied in Section 73.1125(a)(4) of the rules to enable Educational Communications of Colorado Springs, Inc. ("ECCS") to operate a noncommercial educational on Channel 218 at Leadville, Colorado, as a satellite of parent Station KTLF(FM), Colorado Springs, Colorado. The Commission has waived its main studio requirement where "good cause" exists to do so and where the proposed studio location "would be consistent with the operation of the station in the public interest." The Commission has long recognized the benefits of centralized operations for noncommercial educational stations, given their limited funding, and thus has found "good cause" existing to waive the main studio location requirement where satellite operations are proposed and where the satellite station has demonstrated that it will meet its local service obligations to satisfy the Section 73.1125 "public interest" standard. See *Amendment of Sections 73.1125 and 73.1130*, 3 FCC Rcd. 5024, 5026-28 (1988); *Nebraska Educational Television Commission*, 4 RR 2d 771 (I 965). See also *Public Broadcasting of Northwest Ohio*, 12 FCC Rcd. 15114, 15115-16 (1997) (paras. 2-4); *American Family Association*, 12 FCC Rcd. 15128, 15129-30 (1997).

ECCS creates and distributes noncommercial educational programming throughout a regional network of stations and translators with Station KTLF(FM) as the central distribution point.

Consistent with the above-cited cases, ECCS intends to meet its local service obligations necessary to satisfy the Section 73.1125 "public interest" standard. The Leadville Station will operate as a satellite station of commonly-owned Station KTLF(FM), Colorado Springs, Colorado. In order to ensure that local issues in Leadville will be met, ECCS commits to do the following:

- a. ECCS, at least quarterly, will conduct interviews with residents and community leaders to assess community needs and the need for responsive programming;
- b. ECCS will ensure that its Community Advisory Board has at least one resident of Leadville, who will be asked to provide recommendations on community needs and programming directly to ECCS' management;
- c. ECCS will develop periodic local programming for Leadville residents, including coverage of significant local news and cultural events;
- d. ECCS will provide for the broadcast of local public service announcements; and
- e. ECCS will maintain its public file within the community of license and will maintain a local toll free telephone number and mailing address for the benefit of Leadville residents.

Clearly, a waiver is warranted here because of ECCS' demonstrated commitment to serving listeners in Leadville as well as the economic benefits ensuing from a centralized operation that will support additional, high quality programming.

In view of the above, ECCS respectfully requests that the Commission waive Section 73.1125 so as to permit its Leadville, Colorado Station, to operate as a satellite station of Station KTLF(FM), but with local service commitments discussed herein.