

EXHIBIT 13
Request for Waiver of Main Studio Location Rule
New Noncommercial Educational FM Station, Mt. Kisco, NY

WAMC hereby requests a waiver of Section 73.1125(a) of the Commission's Rules in order to operate a new noncommercial educational FM station in Mt. Kisco, NY (the "Station") as a satellite station without a main studio within the station's principal city contour. For the reasons set forth below, WAMC believes that the public interest would be served by a waiver of the rule.

WAMC is a not-for-profit educational corporation chartered by the State of New York. WAMC is dedicated to serving the public with high quality radio programming, which it provides through its regional network of noncommercial radio stations to an audience that stretches over a seven-state area of the northeastern United States. The central hub and flagship station of WAMC's network is station WAMC-FM, located in Albany, New York. WAMC's network is composed of full-power satellite/repeater stations that operate pursuant to previously granted main studio waivers.

WAMC submits that operating the Station as a satellite/repeater station of WAMC-FM and without a separate main studio in Mt. Kisco will serve the public interest by permitting WAMC to provide the highest quality and quantity of public radio offerings possible to the Mt. Kisco community. 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," subject to a showing of good cause why the Commission should grant such a waiver.¹

WAMC proposes to collocate the main studio for the Station with its flagship station WAMC-FM so that it may fulfill its educational mission now and in the future. Allowing WAMC to collocate the main studio facilities for the Station at its existing main studio in Albany will obviate the need to construct unnecessary separate studio facilities in Mt. Kisco. By eliminating duplicative studio and administrative costs, a consolidated main studio operation in Albany will enhance WAMC's ability to provide its unique and valuable public radio programming to listeners in Mt. Kisco and the surrounding communities. WAMC already uses its Albany studios to provide programming to several full-power radio stations, as noted above. Thus, allowing the Station to join the group of stations that utilize the administrative and technical facilities currently on-hand in Albany will be of great benefit to WAMC's efforts to provide top-notch public radio programming to Mt. Kisco in a cost-conscious manner.

The grant of a main studio waiver to WAMC will not affect the ability of WAMC to connect with and serve the citizens of the Mt. Kisco community, and WAMC commits to fulfill its public interest obligations to Mt. Kisco from its collocated main studio in Albany.

¹ See *In re Main Studio and Program Origination Rules for Radio and Television and Television Broadcast Stations*, Memorandum Opinion & Order, 3 FCC Rcd 5024 (1988).

Specifically, WAMC will ascertain and address the needs of the Mt. Kisco community in the following ways:

- Mt. Kisco citizens will have the opportunity to contact WAMC directly regarding the programming and services that WAMC will provide through the Station. WAMC maintains an up-to-date website, located at www.wamc.org, which enables listeners to contact WAMC, comment on programming via email, and obtain extensive information about WAMC's programming schedules, topics, news, and events.
- WAMC maintains a Community Advisory Board which provides recommendations about community needs and programming to WAMC's Board of Trustees. WAMC intends to add a new individual to this Community Advisory Board from the Mt. Kisco area. This addition will facilitate the direct input of Mt. Kisco citizens into the WAMC ascertainment and program planning process.
- WAMC conducts a regular ascertainment study of areas where it maintains satellite stations. Westchester county (including the community of Mt. Kisco) will be added to WAMC's regular ascertainment process.
- Three toll-free telephone numbers will be available to Mt. Kisco residents who wish to contact WAMC, including a main contact line, a number to allow listener participation on call-in talk show programs, and a general listener comment line.

The ascertainment efforts described above will allow WAMC, as licensee of the Station, to ensure that its programming will be responsive to the needs of the Mt. Kisco community. WAMC will thus be able to fulfill its public interest obligations to the citizens of Mt. Kisco by making available to them programming produced at WAMC's studios in Albany that has particular value and relevance to citizens throughout eastern upstate New York. For example:

- WAMC provides local, national and international news to listeners via its award-winning, locally-originated news programs such as *Midday Magazine* and *WAMC Northeast Report*. Listeners receive the latest in local news and weather as well as commentaries offered by guests from a wide range of political backgrounds. WAMC also broadcasts local and regional news segments within its broadcasts of *Morning Edition* and *All Things Considered*.
- WAMC originates the program *Capitol Connection*, a question-and-answer format show that provides listeners with the opportunity to hear directly from legislators and other government officials about current political topics in the state of New York. This program is one of WAMC's most popular and is broadcast on stations across New York state.
- Also on the subject of politics in New York, WAMC broadcasts *The Legislative Gazette*, an original program that offers in-depth examination of state politics and government, including political news and commentary.

- WAMC helps its listeners enjoy the rich cultural offerings found in the region's many arts outlets, such as its regular broadcasts of music performed by the Albany Symphony Orchestra.
- WAMC's Albany studio facilities include a self-contained performing arts studio and music venue, The Norris Auditorium, where musical and other groups can perform in front of a live audience. WAMC also records (or presents live) shows performed at the Auditorium for broadcast over WAMC's radio network, so that listeners who may not have the opportunity to attend in person can nevertheless enjoy the top-notch musical and artist performances presented there.
- WAMC presents a daily call-in talk show program, *Vox Pop*, in which experts in various fields come to participate in discussions with WAMC hosts and answer listener questions on the air. Past topics have included discussions on the subjects of astronomy, genealogy, gardening, health and medical issues, and other topics of general interest to listeners in the community.
- WAMC also originates the program *51%*, which deals with in-depth topics relating to issues of particular concern to women and is carried across the country on other public radio outlets and on Armed Forces radio stations around the world.
- WAMC produces a program called *The Roundtable*, an experimental combination of talk, opinion, music, and live performances on topics and in formats of interest to listeners.
- In addition to the programming offerings listed above, WAMC's website also allows visitors to obtain information about interesting and unique cultural and arts performances throughout the region, via the station's "Arts Index" and "Events Calendar" web pages.

WAMC is particularly suited to serve the needs of the Mt. Kisco community through its existing and extensive regional ties. WAMC's radio hosts and contributors are drawn from educators and others from across the region, and WAMC's unique program offerings constitute a full-spectrum of topics and formats, designed to maximize the usefulness and value of its broadcast services to listeners in the eastern upstate New York area. These factors, in combination with WAMC's ascertainment efforts, will ensure that the needs of the Mt. Kisco community are met notwithstanding the absence of a main studio within the community.

WAMC submits that its commitment to ascertain and serve the needs of the Mt. Kisco community through its high quality regional public radio programming provides more than adequate justification for the grant of a main studio waiver in this case. Additionally, a grant of a main studio waiver for the Station would be consistent with the Commission's previous grants of similar main studio waivers for the network of satellite stations the Commission has authorized WAMC to operate in other communities.

For these reasons, WAMC respectfully requests waiver of Section 73.1125 of the Commission's rules to locate to operate the Station as a satellite of co-licensee WAMC-FM, from a consolidated main studio in Albany, New York.