

(FORM 340, Section II, Question 4B)

Nature, Educational Purpose and Educational Programs of Applicant
This purpose of this exhibit is to set forth how Mano a Mano Family Center's ("Applicant") station will be used to advance an educational program, as required by Form 340, Section II, Question 4B.

Applicant is an Oregon nonprofit public benefit corporation organized under the Oregon Nonprofit Public Benefit Corporation Law and operated exclusively for nonprofit educational purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code. Applicant's bylaws include the specific purposes of 1) establishing, owning and operating an educational, non-profit community supported radio broadcast system; 2) providing radio broadcast facilities to promote and aid the creative skills and cultural welfare of the community; 3) providing instruction and opportunities for the public to learn broadcasting skills, including audio production studio skills; and 4) distributing news and other public information affecting Dallas, Oregon.

Applicant intends to provide programming not currently available in the local community, including programming that responds to the ascertained problems, needs and interests of Dallas, Oregon and the surrounding service area. Applicant will provide regularly scheduled and special in-depth news, public affairs and public service programming on local issues including the environment, business and agriculture, weather, health care and maintenance (including the special needs of senior citizens and children), state, county and local government, education and schools, parenting and cultural affairs. Applicant will also produce programming featuring local lectures, concerts, poetry and literary readings, theater productions and talent.

Examples of educational programs Applicant intends to provide include the following:

1. Local News and topics of local interest
2. Conversations on race, healing, and conflict resolution
3. Call-in shows on current issues, with a local focus
4. Call-in shows with local professionals, including social workers, public officials, attorneys, educators and physicians
5. Shows featuring music from around the world
6. Multilingual programming in various languages, including but not limited to Spanish and Native Mexican languages.
7. Children's programming promoting reading and literacy
8. Educational programming promoting health and wellness
9. Etc.

In addition, Salem-Dallas, Oregon area is an urban area located in the Mid-Willamette Valley. The area immediately surrounding Salem is rural, and agriculture remains one of the top economic activities in the area. Applicant therefore intends to work closely with local volunteer and emergency services to provide public safety information to its service area and intends to have standby emergency power available at both the studio and transmitter sites. If the budget permits, Applicant also intends to install emergency radio communications equipment at its studio within a year of initial broadcast operations.

Applicant is prepared on request to furnish any additional

information to the Commission that may desire regarding its educational program hopes and plans.

Applicant believes the above adequately describes its educational objective and how the proposed station will be used to advance an educational program in furtherance of 47 C.F.R. Section 73.503. The rules are clear that noncommercial licensees are not limited to classroom instruction, but may "transmit educational, cultural, and entertainment programs to the general public," Section 73.503(b). In 1985, in *Way of the Cross of Utah, Inc.*, the Commission rejected a noncommercial application, based in part on the applicant's failure to furnish a proposed program schedule, 101 FCC 2d 1368 (1985). However, despite the Commission's ruling in that matter, there are no cases suggesting a noncommercial applicant is obligated to furnish a program schedule. Additionally, the eligibility for noncommercial FM is less stringent than for the applicant in *Way of the Cross* and other television applicants, since television rules require a station to be used "primarily to serve the educational needs of the community," [emphasis added] Section 73.621(a). There is no counterpart to this requirement for NCE FM applicants.

Further, where illustrative examples of programming have been provided for NCE FM applicants, the Commission has tended to grant the application, even where the proposal is far from comprehensive. For instance, an "illustrative program list," with 10.75 hours identified, was deemed sufficient, *Palm Bay Public Radio, Inc.*, 6 FCC Red 1772 (1991). Even an incomplete schedule geared to "religious instruction" -- not an issue here - has passed muster, *Columbia Bible College Broadcasting Co.*, 6 FCC Red 1772 (1991). Given the Commission's rulings in these and other cases, there is no strict definition as to what may be considered "educational, cultural and entertainment programs" under Section 73.503(b). The Commission recognizes that it has an "appropriately limited role of facilitating the development of the public broadcasting system rather than determining the content of its programming." NPRM, Revision of Programming Policies and Reporting Requirements Relating to Public Broadcasting Licensees, 87 FCC 2d 716 at 732 (1981).