

**MAIN STUDIO WAIVER REQUEST**  
**MONTANA STATE UNIVERSITY-BILLINGS**

The applicant seeks a waiver of 47 CFR §73.1125(a), which requires that a station's main studio be located within its principal community contour. As contemplated in 47 CFR §73.1125(d)(2), the applicant believes that there is good cause to locate the station's main studio outside of the principal community contour and that such operation is consistent with the public interest.

The applicant is the proposed assignee of a permit for a station in Helena, Montana, Facility ID No. 174030 (FCC File No. BAPED-20170111ADP). The main studio for the proposed station is to be established at the studios of applicant's main studio at KEMC, Facility ID 43571, Billings, Montana. KEMC is licensed to the applicant, Montana State University – Billings, which is part of the Montana State University system. Applicant is committed to the goal of providing high quality educational programming to all of its listeners, even though economic realities preclude the provision of a full schedule of programming. The licensee is constructing this new station as a replacement for KYPH, Facility ID No. 173818, East Helena, Montana, which it is giving to another university in the Montana State University system, operated by KGLT, Facility ID No 6085, Bozeman, Montana. See FCC File No. BALED-20170112ABL. KYPH currently operates with a main studio waiver. Applicant requests to operate the new station as a satellite of KEMC.

Even without a main studio in the service area of the proposed station, Applicant will determine local needs by a variety of methods and respond to them in its programming.

Applicant will:

- Establish a toll free telephone number to permit the public to reach the Main Studio without charge;
- Host the public file online on the FCC's website;
- Regularly conduct ascertainments of community needs each quarter in the proposed service area;
- Subscribe to local newspapers and publications.

Locating the station's proposed studio at KEMC's studio will enable Applicant to provide high quality non-commercial 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..." See MO&O, MM Doc. No. 86-406, 3 FCC Rcd 5027 (1988).

Therefore, the Applicant believes that this request for a waiver of 47 CFR §73.1125(a) is in the public's best interest, convenience, and necessity and respectfully requests that it be granted.