

KEFL(FM), KIRKSVILLE, MO
FCC FORM 302-FM, EXHIBIT 6
REQUEST FOR WAIVER OF SECTION 47 CFR 73.1125
APRIL, 2011

By this application, Covenant Network seeks that the Commission grant “satellite” status for KEFL(FM), Kirksville, Missouri to be a satellite of co-owned non-commercial station KHOJ(AM), St. Charles, Missouri.

Covenant Network hereby requests a waiver of the Main Studio Rule, 47 C.F.R. §73.1125, to permit the main studio of KEFL(FM) to be located at 4424 Hampton Avenue, St. Louis, Missouri 63109, which is the main studio of KHOJ(AM). KEFL(FM) would then be operated as a ‘satellite’ of KHOJ(AM).

The KHOJ(AM) studio site (at NAD27 coordinates 38-35-26 N, 90-17-39 W) is approximately 164.9 airline miles (265.393 km) southeast of the Kirksville reference coordinates in the national atlas (40-11-37 N, 92-34-46 W). Covenant Network is a non-commercial educational broadcaster, and seeks a waiver similar to others granted by the Commission to permit “satellite” operation.

The requested waiver would be invaluable to assisting Covenant Network in preserving scarce resources derived from its listener support in order to provide the unique high-quality program service that Covenant Network intends to provide Kirksville, Adair County and vicinity in northeast Missouri.

The Commission previously has recognized the advantages accruing to non-commercial broadcasters from consolidated operations:

In the past, we 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.

Main Studio and Program Origination Rules, 3 FCC Rcd 5024, 5027 (1988). Covenant Network submits that a similar result is warranted here.

In order to better ascertain the needs and interests of the Kirksville/Adair County area and to provide programming to address the unique problems, needs and interests of the Kirksville and KEFL service area, Covenant Network proposes to do the following: (1) Covenant Network will subscribe to the *Kirksville Daily Express*, the newspaper which serves Kirksville and neighboring communities; (2) on a quarterly basis, Covenant Network will conduct interviews with Kirksville leaders and residents; (3) Covenant Network will form an advisory council with at least one resident of Kirksville serving on it; (4) Covenant Network will develop periodic local programming for Kirksville including coverage of news and cultural events; and (5) Covenant

Network will provide the broadcast of local public service announcements of interest to Kirksville and KEFL service area residents.

To facilitate listener input, we maintain a nationwide toll-free telephone number which can be used by the residents of Kirksville and the KEFL service area free of charge, 1-877-305-1234. This number is answered at the corporate headquarters and main studios of Covenant Network, 4424 Hampton Avenue, St. Louis, Missouri 63109. This location is the main studio location for KHOJ(AM), WRYT(AM), Edwardsville, Illinois and WOLG(FM), Carlinville, Illinois, all of which are licensed to Covenant Network.

The Commission has on previous occasions waived the Main Studio Rule to permit "satellite" operation. This waiver request is also similar to requests approved by the Commission for Covenant Network relative to six of its stations: WIHM(AM), Taylorville, Illinois, File No. BML-20010530ADB, granted Dec. 21, 2001; WHOJ(FM), Terre Haute, Indiana, Ref. No. 20041018ADC, granted August 10, 2005; KBKC(FM), Moberly, Missouri, Ref. No. 20041018ADB, granted February 3, 2006; WRMS(AM), Beardstown, Illinois, File No. BML-20050630AGS, granted May 12, 2009; WCKW(AM), Garyville, Louisiana, File No. BML-20070713AGA, granted March 26, 2008; and KHJM(FM), Dexter, Missouri, File No. BLED-20100322ACA, granted April 1, 2010.

The instant waiver request meets the good cause standard applied in previous cases and otherwise serves the public interest, convenience and necessity. Therefore, it should be granted.