

Further, in an effort to provide responsive programming, IBI will monitor news through a subscription to the State Journal Register newspaper and via the United Press International Wire. Additionally, it will conduct an informal ascertainment of area leaders on an on-going basis. Contacts will be made with leaders in the government, civic organizations, religious organizations, business and other groups. IBI will also establish an advisory Board comprised of local community leaders including those from the Springfield service area. This Board will provide regular input on programming. Finally, IBI has noted that it will have a toll-free telephone line.

A "satellite" station has been defined by the Commission as one "operating on a Channel Specified in the rules, but one which usually originates no local programming...It rebroadcast the programming of the parent station" Multiple Ownership Rule, 3 RR 2d 1554, 1562 (1964). In the past, the Commission has recognized the economic benefit of centralized operations. Memorandum Opinion and Order in MM Docket 86-406, 3 FCC Rcd 5024, 5027 (1988). Because of the limited funding available to these stations, we have granted waivers to state and regional public television and radio networks to operate "satellite" stations that do not necessarily meet the main studio requirements. See Nebraska Educational Television Commission, 4 RR 2d 771 (1956) and Sound of Life, Inc., 4 FCC 2d 8273 (1989). However, these stations have not been permitted to ignore local service obligations. See Georgia State Board of Education, 70 FCC 2d 948 (1979). The Commission has never "indicated, directly or indirectly, that licenses were granted to state educational networks for the purpose of providing statewide service and not local service." *Id.*, at 956. Waivers generally have been granted "only upon a showing that the local community would be served . . . (and) such stations will be subject to the local/ toll-free telephone requirements" 3 FCC Rcd at 5027. See also 47 C.F.R. Sec. 73.1125(c).

IBI has established that, even without a main studio in the service area of the proposed station, it will determine local needs and respond to them in its programming. This is so because: (i) IBI will air programming which will address service area needs of Springfield residents; (ii) IBI plans to air on a weekly basis a one-half hour public affairs or news program dealing specifically with needs in the Springfield area; (iii) IBI will monitor news in the Springfield area; (iv) IBI will participate in regular ascertainment of local needs in Springfield; (v) IBI will establish an Advisory board comprised of local community leaders including those from the Springfield area; and (vi) IBI will provide a toll-free telephone line from Springfield to the Carlinville studio.