

25 JUN 1991

RMPED - 9010107e

JUSTIFICATION FOR NON-ROUTINE GRANT

Main Studio. Minnesota Public Radio, Inc. ("MPR") is the permittee of new noncommercial FM radio station KXLC in La Crescent, Minnesota. MPR is a nonprofit corporation formed for the purpose of providing noncommercial educational radio service to listeners in Minnesota and surrounding states. The applicant seeks a waiver of the 47 C.F.R. § 73.1125 (a) (4) requirement that it maintain a main studio location within La Crescent's city-grade contour, so that it may instead operate as a "satellite" station of, and from the main studios of, noncommercial educational FM stations KLSE-FM and KZSE, Rochester, Minnesota.

In support of its waiver request, MPR states:

1. Although the service area population is large, the population within the community of license is not (it is approximately 3,000). Because of the community's limited size and economic base, it is highly unlikely that a station with separate staff and studio could provide the same high quality public radio service that MPR proposes.
2. MPR will install a toll free telephone line by which residents of La Crescent can reach MPR management to express concerns about station operation.
3. The MPR stations in Rochester (KLSE and KZSE) already maintain a regional advisory council that provides input to management on programming issues of interest to the residents of southeastern Minnesota, including the La Crescent area. In fact, a member of that council is a resident of the La Crescent area.
4. For several years, KLSE has operated a FM translator (K269BK), serving the La Crescent area for which input from the community has played an important role in programming decisions. Because of this history, MPR already has established relationships with listener-members who reside in the La Crescent area, who will provide additional input in making programming decisions.
5. Locally-responsive programming will be produced at MPR's nearby Rochester, Minnesota stations (KLSE and KZSE) which have a full staff and a fully equipped studio. KLSE and KZSE currently break away from MPR network programming to broadcast programming of local interest. Programming specific to La Crescent area residents will be broadcast by these stations and retransmitted simultaneously by the La Crescent facility.

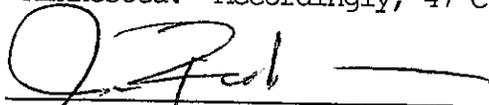
A "satellite" station has been defined by the Commission as one "operating on a channel specified in the...Table of Assignments and meeting all of the technical requirements of our rules, but one which usually originates no local programming....It rebroadcasts the programming of the parent station." Multiple Ownership Rules, 3 RR 2d 1554, 1562 (1964).

Satellite stations may involve relaxation of the Commission's main studio location rule, 47 C.F.R. § 73.1125.

The Commission has stated that "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. These stations, however, have not been permitted to ignore local service obligations, and waivers generally have been granted only upon a showing that the local community would be served." Memorandum Opinion and Order in MM Docket No. 86-406, 3 FCC Rcd 5024, 5027 (1988). Thus, even without a main studio within the city-grade contour, the Commission expects applicants to meet local needs. MPR's proposal fully satisfies these concerns.

We have determined that MPR has established that its centrally programmed simultaneous schedule will serve the problems, needs and interests of La Crescent, Minnesota. Accordingly, 47 C.F.R. § 73.1125 (a) (4) IS HEREBY WAIVED.

APPROVALS:

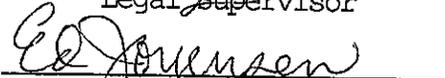


Attorney



Legal Supervisor

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Chief FM Branch