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July 14, 2016

Accepted / Filed

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

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Federal Communications Commission  
Office of the Secretary

**RE: Request for Waiver of 73 CFR §73.1125(a)  
West Central Michigan Media Ministries  
WNHG, Grand Rapids, Michigan  
Facility ID No. 24772**

Dear Ms. Dortch:

On behalf of West Central Michigan Media Ministries (“WCM”), I am submitting herewith a request for a waiver of §73.1125(a) of the Commission’s rules with respect to its noncommercial FM station WNHG, Grand Rapids, Michigan (Facility ID #24772). WCM is a nonprofit corporation, and the licensee of multiple noncommercial radio stations.

Pursuant to §73.1125(a) of the Commission’s rules, each broadcast station is to maintain a main studio in or near the community of license. However, when good cause exists, §73.1125(b)(2) permits a station to establish its main studio at a location other than that described in §73.1125(a), “when so doing would be consistent with the operation of the station in the public interest.”

The FCC has recognized the benefits of centralized operations for NCE stations, given their limited funding. Such benefits have been deemed adequate “good cause” to justify waiver of the main studio location requirement. See *Main Studio and Program Origination Rules*, 3 FCC Rcd 5024, 5027 (1988). WCM’s finances are limited and the savings to be realized from reduced requirements on the premises of WNHG would help the organization in its efforts to provide a high quality of service to the public. Toward that end, WCM proposes to co-locate the main studio for WNHG with the main studio for its co-owned noncommercial station, WGCP, Cadillac, Michigan. WNHG will broadcast substantially the same programming as WGCP.

WCM acknowledges that as the licensee of WNHG, it will have certain local service obligations to the station’s community of license and service area. WCM intends to operate the station to benefit the residents of the service area and to broadcast programming responsive to the community’s needs and interests. Accordingly, WCM proposes as follows:

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1. A duplicate copy of the public inspection file for WNHG will be maintained in the station's community of license. (The original copy of the public inspection file will be maintained at the main studio at WGCP)

2. A toll-free telephone number will be available for the residents of the WNHG service area to contact station personnel.

3. WCM will engage a local public affairs representative, who may be a volunteer, to develop and maintain local contacts with community leaders in the WNHG service area and who will ascertain local needs and interests at least once per calendar quarter. Programming will be aired to address those local needs and interests. The local representative will serve as a liaison between residents of the WNHG service area and WCM's programming personnel.

On behalf of WCM, the undersigned counsel certifies that neither WCM nor any party to this request is subject to the denial of federal benefits pursuant to §5301 of the Anti-Drug Abuse Action of 1988 (21 USC §862).

Please contact the undersigned should you have questions concerning this matter.

Very truly yours,



Donald E. Martin

Counsel for

West Central Michigan Media Ministries

cc: Penelope Dade