

## **REQUEST FOR MAIN STUDIO RULE WAIVER**

Horizon Christian Fellowship (“Horizon”), the permittee and proposed licensee of noncommercial education FM station WTNP, Richland, MI, Facility ID 121857 (the “Station”), hereby requests a waiver of the main studio rule, 47 C.F.R. Sec. 73.1125 (the “Rule”). Specifically, Horizon seeks a waiver of Section 73.1125(a) pursuant to the “good cause” exception contained in Section 73.1125(b)(2) of the Rule. As set forth below, there is good cause for approval of this waiver.

Horizon is a non-profit, charitable corporation, which is tax-exempt under Section 501(c) of the Internal Revenue Code. It is the licensee of noncommercial education FM station KSRD, St. Joseph, Missouri, Facility ID 85873. Horizon seeks a waiver of the Rule in order to operate the Station as a satellite of KSRD.

In the 2000 census, Richland, Michigan (the village) had a population of just 593. The township of Richland (of which Richland village is part), had a 2000 census population of 6,491. Horizon estimates that the community is unlikely to provide sufficient local financial contributions to support the Station’s operations. Moreover, public funding is not available for private non-profit broadcast organizations such as Horizon. Horizon respectfully submits that, due to the limited financial resources available to support the Station and the unavailability of public funding, a waiver of the Rule will best serve the public interest in this instance.

In the past, the Commission has allowed noncommercial educational broadcast licenses to operate as satellite stations. *See generally Nebraska Educational Television Commission*, 4 RR 2d 771 (1965). In so doing, the Commission has recognized that the substantial cost savings realized from not constructing an additional main studio allows those resources to be used to

provide an expanded amount of public affairs programming, which serves the public interest.

*See Amendment of Section 73.1125 and 73.1130 of the Commission's Rules*, 3 FCC Rcd 5024, 5027 (1988). In this regard, satellite stations may not ignore their local service obligations.

*Georgia State Board of Education*, 70 FCC 2d 948, 956 (1979). Accordingly, waivers are generally granted only where the licensee has demonstrated that the local community will be adequately served, and the satellite station satisfies the local/toll-free telephone requirement.

*Amendment of Section 73.1125*, 3 FCC at 5027.

In this case, Horizon will fulfill its local service obligations despite the absence of a main studio. In order to remain attuned to the problems, needs, and interests of the community and respond to those needs through its programming, senior Horizon personnel will maintain contact with local community leaders and seek recommendations for programs designed to address the needs and interests of the community. This will be achieved, on at least a quarterly basis, through ascertainment contacts with local community leaders and other residents to determine the concerns, problems and needs of listeners in the area. In addition, the Station will maintain a local toll-free phone number for members of the community of license to contact the main studio in St. Joseph, Missouri. Based on these community-input efforts, Horizon will broadcast, on a regular basis, satellite-fed programs and announcements directed to Richland's needs and interests. Horizon also will maintain the public file for the Station in Richland.

Due to the limited financial resources available locally in the community, and the unavailability of public funding, Horizon respectfully submits that a waiver of the Rule is warranted on the basis of the alternative commitments made to serve local needs and interests, as stated above.