

**CHURCH PLANTERS OF AMERICA
6704 Hwy 8 South
Germanton, NC 27019**

Joseph A. Wells III
On Behalf of:
Church Planters of America
6704 Hwy 8 South
Germanton, NC 27019

Via Federal Express

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

**REQUEST FOR WAIVER OF SECTION 73.1125 OF THE
COMMISSION'S RULES**

KJBB(FM), Watertown, SD
Facility ID Number: 93041

Dear Ms. Dortch:

Church Planters of America("CPA"), hereby respectfully requests a waiver of the Main Studio Rule, 47 C.F.R. § 73.1125, to permit CPA, the Licensee of the Broadcast Station KJBB(FM), a noncommercial Educational ("NCE") FM station in Watertown, SD(FIN: 93041), to locate KJBB(FM)'s main studio in Germanton, NC. Section 73.112S(a) provides, in pertinent part, that a station's main studio must be situated within (1) its community of license; (2) the principal contour of any other Broadcast station licensed to its community; or (3) 25 miles of the center of its community of license. CPA has, for over 8(Eight) years abode by these rules. However, it has become a financial burden to maintain this studio, and as such, CPA believes that it would

better be able to serve the public interest by co-locating it's KJBB studio with the Currently Existing studio in Germanton, NC, where WGIW, another CPA broadcast station, is also broadcast from. CPA is aware of KJBB's local service obligations and has developed a plan to allow it to determine the local needs of the community and to respond to those needs. KJBB would not become a satellite station, it would maintain it's own programming schedule, and CPA would do everything necessary and required to keep the station in touch with it's community of License. CPA will subscribe to the local daily newspaper, so as to be aware of any pertinent local issues in the community, and respond with programming. In Addition, CPA agrees to conduct quarterly surveys, in order to ascertain which issues are of importance in the local communities, as well as periodically review the websites of Watertown's local newspaper, The Public Opinion (www.thepublicopinion.com) and the Watertown Chamber of Commerce (www.watertownsd.com). KJBB will also continue to Broadcast public service announcements of local interest provided by national, state, and local organizations; and announce on-air a website which will allow for the placement of comments from its listeners concerning community needs and programming; and maintain within the community of Watertown a toll-free telephone number in Compliance with Section 73.1125(e) of the Commission's Rules. FCC rules state that a main studio may be maintained beyond the limits stated above where Good Cause exists, or "when doing so would be consistent with the operation of the station in the public interest." 47 CFR §73.1125(b)(2). Pursuant to 47C.F.R. § 73.1125(d)(2), CPA seeks a waiver so that it may locate KJBB's main studio in Germanton, NC. CPA intends to deliver its signal from its headquarters location in Germanton, NC to the proposed facility in Watertown, SD. As explained above, Commission precedent and good cause support the requested waiver and it would be in the public interest for the Commission to grant this request. CPA plans to establish KJBB's new studio in Germanton, NC, where CPA is Headquartered, and where it will also reestablish its principal program production facilities. Germanton, NC is approximately One Thousand and Seventy-One miles from Watertown, SD, and outside KJBB's proposed contour. CPA anticipates linking KJBB with its Germanton, NC production facility through some combination of microwave links and data lines. In reviewing waiver requests, the Commission has previously found that

limited funding constitutes" good cause" for locating a main studio outside the parameters set forth in Section 73.1125(a) and that to do so would be in the public interest. Limited funding and economies of scale have been found to constitute "good cause" even if the Proposed main studio is a significant distance from the station. Limited funding and economies of scale exist in this case and warrant a grant of the requested waiver. As the Commission is aware, there are substantial costs associated with operation and maintenance of a main studio, including those Attributable to equipment, personnel wages, and facility rent and utilities. Because CPA intends to originate the vast majority of KJBB's programming from its Headquarters location in Germanton, virtually all of these costs can be saved if CPA's Requested waiver is granted. CPA proposes to use the cost savings to more fully equip and staff its Germanton, NC broadcast production facility, where senior CPA management and experienced staff personnel also will be available. Locating KJBB's main studio in Germanton, NC will enable CPA to attain the economies of scale and costs savings necessary to maintain the high quality of its noncommercial educational programming. As shown herein, CPA is committed to ascertaining the local problems, needs and interests of Watertown and has demonstrated that it will satisfy its local service obligations. CPA's commitment and this demonstration, in conjunction with the limited funding and economies of scale present in this case, support a finding by the Commission that good cause exists for the requested waiver and that a grant of the waiver would be in the public interest.

Very truly yours,

Joseph A. Wells III

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Church Planters of America