

**JUSTIFICATION FOR MAIN STUDIO BEING BEYOND THE 3.16 mV/m FIELD
STRENGTH CONTOUR OF THE PROPOSAL
(Section V-B, Question 16, Page 15)**

This request for a main studio waiver is made in conjunction with the FCC Form 314 filing for transfer of control of KAEZ-FM from KXOJ, INC. to the Kanza Society, Inc (dba as High Plains Public Radio) (FCC File No. BALH-20040513AAC). The assignee proposes that programming on KAEZ-FM originate from the studios of High Plains Public Radio in Garden City, Kansas. The reasons for locating the main studio outside of the 3.16 mV/m contour are two-fold:

1. Economics. By utilizing the existing studios of High Plains Public Radio, the Amarillo, TX community will have the benefit of an existing \$600,000 broadcasts and production studio facility as well as a public radio programming service that currently costs over \$800,000 per year to operate. Given the very rural nature of the High Plains region of which Amarillo is a part, public radio service is only possible through extreme efficiencies of operation. As a benchmark of the "ruralness" of HPPR's coverage area, the Corporation for Public Broadcasting uses a threshold for rural service designation of 60 people per sq. km. HPPR's service area population density is calculated by CPB as only 14 people per sq. km.
2. Programming quality. By tying into the existing High Plains Public Radio service, the community will benefit from a programming service developed from 24 years of experience in serving the region. This service includes the best of public radio programming from national and international sources (NPR, Public Radio International, Minnesota Public Radio, BBC, etc.) as well as locally produced programming tuned to the interest of the High Plains region and the Amarillo community (see staffing and programming production notes below).

Since 1998, High Plains Public Radio has developed multiple mechanisms to serve and involve citizens in the Amarillo, TX community.

- Full-time staff in Amarillo. HPPR has two full-time paid staff members in Amarillo. One is a program producer who provides daily news reports, interviews and features that will be transmitted to the Garden City, KS studio for airing on KAEZ (as well as other facilities operated by HPPR in the region). This producer has both home-based and field production equipment with which to produce this programming. The other

staff person focuses on community outreach and underwriting support and maintains daily contact with individuals, organizations, and business in the Amarillo community.

- Regional programming staff and production. In addition to staff located in Amarillo, Garden City, KS based staff regularly produce feature stories, interviews and community service announcements about activities and people in Amarillo.
- Community support group. Since 1998 the "Texas Friends of HPPR", a volunteer community group of some two-dozen members based in Amarillo, has provided programming input, community relations and fundraising support for HPPR. It provides a ready and ongoing means of soliciting programming feedback and assessing issues of community concern.
- Website. A website containing the current programming schedule, program information, local community announcements, and an e-mail link to the studios is currently maintained (hppr.org).
- Representation on the governing board of the licensee. Five of the 12 members of the board of directors of the Kanza Society, Inc. reside within the 60-dBu contour of the station (four in Amarillo and one in nearby Canyon, TX). This direct involvement in the governance of the station by community members ensures Amarillo community interests are served.
- 800 numbers. A toll free number to the Garden City, KS studios is already maintained and heavily promoted on air (as required by the Commission for remote studios). Through this number listeners can easily reach the HPPR studios directly at no cost.