

FCC MAIL SECTION FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

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IN REPLY REFER TO:  
1800B3-ALM

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Southmayd and Miller  
1233 20th Street, N.W.  
Second Floor  
Washington, D. C. 20036

In re: NEW, Sandusky, Ohio  
Moody Bible Institute of Chicago  
File No. BPED-920331MB

Dear Mr. Southmayd:

This is in reference to the subject application filed by Moody Bible Institute of Chicago ("MBI") for a new noncommercial, educational FM station in Sandusky, Ohio. The applicant seeks a waiver of 47 C.F.R. § 73.1125(a) (4) to operate its proposed Sandusky facility as a satellite station of commonly owned station, WCRF-FM, Cleveland, Ohio.

In order to ensure that local issues in Sandusky will be met, MBI has agreed to undertake the following:

1. Ascertain the problems, needs and interests of Sandusky and address these through its programming.
2. Establish a Citizens Advisory Board made up of residents of Sandusky, Ohio. The Board will meet periodically with the General Manager of WCRF-FM, Cleveland.
3. At least two of the meetings each year of the Board will be open to members of the public to attend and participate in the discussions. Announcements of the dates and times of these meetings will be made, numerous, on the station during the week before the meeting.
4. WCRF-FM, Cleveland, will include news insertions in its local broadcasts to include segments regarding events in Sandusky.
5. The proposed station and WCRF-FM will periodically broadcast public affairs programming responsive to the local, Sandusky, issues of public concern ascertained by Moody in connection with its information gathering efforts.
6. Maintain a toll free telephone number between Sandusky and the studio of WCRF-FM in Cleveland, Ohio.

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 involve deviations from such Commission regulations as station main studio locations (Section 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 (1988). Thus, local needs should be met by this applicant.

We have determined that MBI has established that its centrally programmed simultaneous schedule will serve the problems, needs and interests of Sandusky, Ohio. Accordingly, we will waive the applicable rule section and grant the construction permit application.

Sincerely,

*Dennis Williams*

Dennis Williams  
Chief, FM Branch  
Audio Services Division  
Mass Media Bureau