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FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D. C. 20554

FEB 14 2001

Dennis F. Begley, Esq.
Reddy, Begley & McCormick
Suite 350
2175 K Street, N.W.
Washington, D.C. 200037-1803

In re: **KCFB(FM), St. Cloud, MN**
Facility ID # 21379
Minnesota Christian Broadcasters, Inc.

File No. BLED-19991213AAH
Request for Waiver of 47 C.F.R. §73.1125
Filed on November 15, 1999

Dear Mr. Begley:

The staff has under consideration: (1) the captioned application of Minnesota Christian Broadcasters, Inc. ("MCBI") for license to cover the existing authorization of Station KCFB(FM), St. Cloud, Minnesota; and (2) a November 15, 1999 request for waiver of the Commission's main studio rule, 47 C.F.R. §73.1125, in order to operate station KCFB(FM) as a "satellite" of MCBI's station KTIG(FM), Pequot Lakes, Minnesota. For the reasons set forth below, we will grant both MCBI's request for waiver and its license application.

Pursuant to Section 73.1125, a station's main studio must be located either (1) within a station's principal community contour; (2) within the principal community contour of any other broadcast station licensed to its community; or (3) within 25 miles of the center of its community. See Report and Order, Review of the Commission's Rules regarding the main studio and local public inspection files of broadcast and radio stations, 13 FCC Rcd 15,691 (1998); recon. granted in part, 14 FCC Rcd 11,113 (1999) ("Reconsideration Order"). However, under Section 73.1125(b)(2), the Commission will waive this requirement where "good cause" exists to do so and where the proposed studio location "would be consistent with the operation of the station in the public interest." Each waiver request by an NCE station seeking to operate as the satellite of another NCE station is considered on a case-by-case basis. The Commission has recognized the benefits of centralized operations for NCE stations, given their limited funding, and thus has found that "good cause" exists to waive the main studio location requirement where satellite operations are proposed. *Id.* In order to receive a satellite main studio waiver, an applicant must demonstrate that it will meet its local service obligation to satisfy the Section 73.1125 "public interest" standard. *Id.*

MCBI's request is based on the economies of scale which would be realized by grant of its waiver, *i.e.*, avoiding the cost of equipping, operating, and staffing a main studio in the St. Cloud, Minnesota area. It also indicates that it had been operating with a studio in St. Cloud but had been advised that it was being evicted from the studio location. It therefore proposes to operate KCFB as a satellite of KTIG(FM).

We conclude that MCBI has demonstrated "good cause" to waive 47 C.F.R. § 73.1125(a)(4) in these circumstances. St. Cloud is approximately 70 miles from Pequot Lakes, the location of KTIG(FM). Where there is a considerable distance between parent and satellite stations, we are particularly concerned that the licensee take adequate measures to maintain its awareness of the satellite community's needs and interests and respond to them in its programming. To that end, MCBI states that, while KCFB(FM) will primarily rebroadcast KTIG-FM, it will present programming to address the local problems, needs, and interests of St. Cloud residents on KCFB(FM). MCBI has stated that: (1) it has leased office space in St. Cloud to be staffed by a full-time Operations Manager, who will oversee St. Cloud operations, interact with local listeners and community leaders, and be available to local listeners on a full-time basis; (2) it will establish a Community Advisory Board composed of St. Cloud residents, who will provide recommendations on community needs and programming directly to MCBI management;¹ and (3) it receives regular news reports from the St. Cloud area as a member of the Associated Press, thus facilitating KTIG(FM)'s inclusion of significant St. Cloud news coverage in its eight local daily newscasts. Additionally, MCBI indicates that it will include St. Cloud events in its regular "Community Calendar" announcements, and it will continue to air St. Cloud School closings and weather reports over KCFB(FM). Finally, MCBI pledges to maintain its public file in St. Cloud and to maintain a toll-free telephone line from St. Cloud to the KTIG(FM) studios.

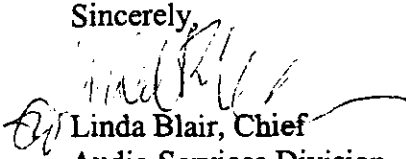
In these circumstances, we are persuaded that MCBI will meet its local service obligations and thus that grant of the requested waiver is consistent with the public interest. We remind MCBI, however, of the requirement that it maintain a public file for its St. Cloud, Minnesota station at the main studio of the "parent" station, KTIG(FM) in Pequot Lakes, Minnesota. It must also make reasonable accommodation for listeners wishing to examine the file's contents. *See Reconsideration Order*, 14 FCC Rcd at 11,129 ¶ 45. We further remind MCBI that, notwithstanding the grant of the waiver requested here, the public file for KCFB(FM) must contain the quarterly issues and programs list for St. Cloud, Minnesota, required by 47 C.F.R. § 73.3527(e)(8).

We have also examined MCBI's modification application and find that it complies with all pertinent statutory and regulatory requirements and thus that the public interest, convenience, and necessity would be furthered by its grant. In accordance with these findings, and in reliance upon the representations listed above, the application (File No. BLED-19991213AAH) of Minnesota Christian Broadcasters, Inc. for license to cover the construction permit of station

¹ MCBI notes that the board will meet at least quarterly with MCBI management.

KCFB(FM), St. Cloud, Minnesota, and its request for waiver of 47 C.F.R. § 73.1125 ARE GRANTED. The authorization is enclosed.

Sincerely,


Linda Blair, Chief
Audio Services Division
Mass Media Bureau