

Exhibit 13
The Love Station, Inc.
New Station Application Studio Waiver

Request for Waiver of Main Studio Location Section 73.1125

The Love Station, Inc. (“Love”) requests a waiver of Section 73.1125 of the FCC’s rules for a new non-commercial educational FM station in Hammon, OK (the “Station) to allow Love to operate the Station as a satellite of Love’s non-commercial educational station, KJTH, with a main studio at Love’s studio location in Ponca City, OK.

Background

Love is the licensee of noncommercial radio station KJTH, Ponca City, Oklahoma. The Station will operate as a complete repeater of KJTH, re-broadcasting 100% of that station’s programming.

KJTH Radio is a listener-supported service of Love. The KJTH Radio programming is produced at KJTH for distribution over the Love stations. Use of the KJTH facilities as the main studio for the Station will serve the public interest because it will allow Love to conserve valuable resources while providing high-quality public radio programming that the Hammon community might not otherwise be able to enjoy. Moreover, as demonstrated below, Love will undertake appropriate efforts and establish appropriate practices in order to ascertain the needs and concerns of the community and to respond to those issues through its programming.

Justification

Love submits that the requested waiver and satellite status will serve the public interest. By operating the Station from the existing main studio of KJTH, Love will be able to provide the highest quality and quantity of public radio offerings to the Hammon community. 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,” subject to a showing of good cause why the Commission should grant such a waiver.¹

In this case, significant public interest gains will result from collocation of the studio facilities. Specifically, a main studio waiver will allow Love to conserve valuable financial resources and eliminate the need for unnecessary duplication of equipment and personnel. Conservation of resources is vitally important for listener supported non-

¹ See *In re Main Studio and Program Origination Rules for Radio and Television and Television Broadcast Stations*, Memorandum Opinion and Order, 3 FCC Rcd 5024 (1988).

commercial educational radio stations such as Love. Furthermore, Love's pursuit of a waiver in this case is prompted by its desire to provide its high-quality educational programming services to an area of Oklahoma that might otherwise lack the economic wherewithal to support such a high quality public radio service. Finally, Love's commitment to serve the educational needs of the Hammon community through high quality educational programming will ensure that the Station serves the needs of its community of license despite the lack of a local main studio.

Collocating the main studio for the Station with KJTH in Ponca City will allow Love to fulfill its educational mission in a manner consistent with the realities of the public broadcasting funding situation. Love is a non-commercial educational radio station, totally dependent upon our listeners for all of its operating revenues. Consequently, it is vitally important for Love to conserve financial resources wherever possible, as an extra expense in one area of its operations means fewer resources available for other, no less important or valuable, programs. By eliminating the need for duplicative studio, personnel, and administrative costs, a consolidated main studio operation in Ponca City will enhance Love's capability to provide quality national and local public radio programming to listeners throughout Hammon and the surrounding community. Without this mode of operation, it would be difficult for Love to both maintain a separate local studio, and provide high quality programming. Love already utilizes its Ponca City studio as a recording studio and production space for KJTH. Thus, allowing the Station to take advantage of the administrative and technical facilities currently in place in Ponca City will be of particular benefit to Love as it strives to provide varied public radio programming to Hammon and the surrounding community in a cost-conscious manner.

For the following reasons, the grant of a main studio waiver will also not have an adverse effect on the ability of Love to ascertain the needs of the Hammon community and address them through its programming:

- Hammon citizens will be able to make contact with KJTH via an active toll-free number that permits residents throughout the United States to reach the KJTH office without long-distance charges.
- KJTH will monitor the online edition of the state wide newspapers, in addition to being alerted for Hammon-area local news from other sources.
- KJTH maintains an up-to-date website at www.theHouseFM.com, which enables listeners to comment on programming via e-mail, and obtain extensive information about KJTH's network schedules, programs and events.
- KJTH's website also provides an interactive community calendar that allows individuals and organizations anywhere (including Hammon) to submit information about upcoming events.
- Love will add to its Community Advisory Board at least one resident of the community of Hammon, who will be asked to provide recommendations on community needs and programming directly to the management of Love.
- KJTH will assess community needs and problems through the analysis of audience mail, email, informal surveys and meetings.

- KJTH will provide periodic local programming for Hammon including, but not limited to, coverage of significant local news, weather or cultural events.

These efforts will help Love, as licensee of the Station, to select programming that is responsive to the needs of the Hammon community. In addition, Love will also address community needs through its programming. Love will also provide listeners with access to national news programming and programs such as *SRN News* and *Focus on the Family*. Love submits that its commitment to ascertain and serve the needs of the Hammon community by providing high quality public radio programming, the likelihood that the Hammon community might not otherwise be able to support a comparable standalone noncommercial public radio outlet, and the necessity of conserving financial resources justify the grant of a main studio waiver. Accordingly, Love respectfully requests waiver of Section 73.1125 of the Commission's rules to locate the main studio for the Station in Ponca City, Oklahoma. Love submits that the public interest will be served by authorizing the Station as a satellite without a local main studio, as part of a collocated operation at the studios of Love's noncommercial educational station, KJTH.