

REQUEST FOR MAIN STUDIO RULE WAIVER

Bible Broadcasting Network, Inc. ("BBN"), hereby respectfully requests that the Commission grant a waiver of Section 73.1125(a) of the Commission's rules to permit BBN to operate KJSL(AM)¹, St. Louis, MO, as a "satellite" of BBN's station WYFQ (AM), Charlotte, North Carolina. Good cause for a waiver exists. In support of its request, it is stated as follows:

BBN is a non-profit corporation organized under Section 501(c) of the Internal Revenue Code. BBN is the licensee of Station WYFQ as well as 39 other noncommercial educational stations and numerous FM translator stations. BBN seeks a waiver of the main studio rule in order to operate KJSL as a satellite of Station WYFQ(AM) and to carry BBN's programming. WYFQ has a full staff and otherwise can serve as the main studio for KJSL.

Public funding is not available for private non-profit broadcast organizations such as BBN. BBN respectfully submits that due to the limited financial resources available to support KJSL and the unavailability of public funding, a waiver of the main studio rule will serve the public interest in this instance.

KJSL already has full capability to provide local programming. BBN does not seek to change that by this request for waiver. Thus, this request relates to the staffing requirement of Section 73.1125(a). See, *Jones Eastern of the Outer Banks*, 6 FCC Rcd. 3615 (1990). In requesting this waiver, BBN intends to meet its local service obligation in the following manner:

BBN will have a Community Advisory Board with at least one member from St. Louis. That member will, at least quarterly, ascertain the needs and interests of KJSL's listening audience.

BBN will maintain its public file in Charlotte, NC, and will maintain a local toll free number for the benefit of St. Louis residents.

Grant of this waiver request will, by reducing operating expenses, enable BBN to improve its overall program production. Therefore based on the above commitments, Bible Broadcasting Network, Inc., respectfully requests Commission consent to operate KJSL(AM), St. Louis, MO, as a satellite of WYFQ(AM), Charlotte, North Carolina.²

¹ BBN proposes to request call sign "KYFI" for KJSL.

² A waiver of Section 73.1125 was granted March 14, 2002, to BBN on similar facts that permit Station WYFL(FM), Henderson, North Carolina, to operate as a satellite of Station WYFQ-FM, Wadesboro, North Carolina. A waiver of Section 73.1125 was granted October 19, 2010, to permit Station WYBK(FM), Chattanooga, Tennessee, to operate as a satellite of Station WYFQ(AM), Charlotte, North Carolina. A waiver of Section 73.1125 was granted June 25, 2012, to permit Station WYBP(FM), Fort Lauderdale, Florida; WYBX(FM), Key West, Florida; and WYBW(FM), Key Colony Beach, Florida, to operate as satellites of Station WYFQ(AM), Charlotte, North Carolina.