

## AMERICAN FAMILY ASSOCIATION

Office of General Counsel

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September 16, 2005

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

### REQUEST FOR EXPEDITED PROCESSING

Ref: *Assignment of CP and Waiver of Main Studio Rule*  
WSQH(FM), Forest, Mississippi  
Facility ID No. 91176  
File No. BPED-19980714MD as modified by BMPED-2003115AAY

Dear Secretary Dortch:

Please accept this letter for filing. Please file-stamp and return the extra copy in the enclosed postage paid envelope.

Due to Hurricane Katrina, the Commission has approved a 90 day tolling of the Salt and Light Communications, Inc. (S&L) construction permit for Forrest, MS. Our engineers report that although the roads are washed-out, the tower is still there, but there is no studio. We have determined that the most expeditious way to get WSQH(FM) on the air is to assign the CP to American Family Association, Inc. (AFA) and, upon assignment, operated WSQH(FM) as a satellite of WAFR(FM), Tupelo, Mississippi.

We believe that we can accomplish the assignment within the tolling period if the Commission will **expedite putting the Assignment Application on public notice** and will **expedite the processing of a request for waiver of main studio requirement** at the same time.

The Commission has long recognized "the benefits of centralized operations for noncommercial educational networks, given the limited funding available to these stations," and has "granted networks to operate 'satellite' stations that do not necessarily meet the requirements of a main studio." The Commission does not permit these stations "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 the Matter of Amendment of Sections 73.1125 and 73.1130 or the Commissions Rules, the Main Studio and Program Origination Rules for Radio and Television Broadcast Stations*, FCC 5025 (1988). Consistent with this FCC policy, AFA requests that upon approval of the assignment of the construction permit for WSQH(FM), the Commission grant a waiver to operate NCE station WSQH(FM) as a

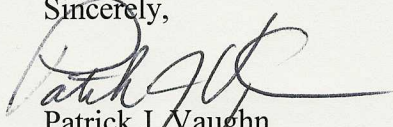
satellite of WAFR, Tupelo, Mississippi. This will solve the studio problem and avoid further Hurricane Katrina delay. The Commission has recognized that such operating economies by NCE networks are consistent with the public interest. *Id.*

AFA will not ignore local community service obligation that is incumbent in its license. Further, AFA will not lose sight of the fact that listeners will only make donations to keep the station on the air if the station is serving their needs and addressing their interests. Therefore, AFA will take the following steps to assure that the station serves the local community:

1. AFA will maintain a toll-free number that community residents can use to communicate with the station.
2. AFA will cultivate and maintain relationships with individuals and groups in the local community who can provide recommendations regarding community interests, needs and programming. AFA will track listener response by community and factor those responses in its planning of the program and schedule and the issues to be discussed.
3. On-air during its fund raising campaigns (at least twice a year), AFA will solicit opinions and recommendations from the community regarding local needs and interests and programming.
4. AFA will provide coverage of significant local community news and cultural events.
5. AFA will provide for the broadcast of local public service announcements.

The foregoing measures demonstrate that AFA will not ignore its local service obligations. Therefore, for "good cause" AFA requests that upon assignment from S&L, the Commission authorize NCE station WSQH(FM), Forest, Mississippi to operate as a satellite of NCE station WAFR-FM, Tupelo, Mississippi.

Sincerely,



Patrick J. Vaughn  
General Counsel