

**REDEEMER BROADCASTING, INC.**  
**WNEQ(FM), Taylortown, New Jersey**  
**FCC Form 302 Exhibit 6**

**MAIN STUDIO WAIVER**

Redeemer Broadcasting, Inc. ("RBI"), the FCC permittee of FM radio station WNEQ(FM), Taylortown, New Jersey, hereby respectfully requests a waiver of Section 73.1125 of the Commission's rules (hereinafter referred to as the "main studio rule") to permit the location of the main studio of WNEQ(FM) from a location within the principal community contour of WNEQ(FM), to the main studio of RBI's co-owned station WFSO, Olivebridge, NY. The proposed studio location, is approximately 63 miles north of the transmitter site and approximately 50 Miles outside of the 3.16 mV/m contour of WNEQ(FM).

RBI proposes to operate WNEQ(FM) as a "satellite" station of WFSO. WNEQ(FM) will be part of a network of local radio broadcast stations that includes three translators operated by RBI. RBI is a non-profit corporation and each station operates non-commercially and broadcasts the common noncommercial educational programming. By co-locating WNEQ(FM)'s main studio at WFSO's main studio in West Shokan, RBI will realize valuable economies of scale and cost savings, which are needed to maintain the high quality of its noncommercial educational programming. As a listener-supported station, WNEQ(FM) will face severe financial constraints. The obligation to maintain separate staffing and studio locations for both WNEQ(FM) and WFSO will place a serious financial burden on RBI and divert what limited resources are available from its programming efforts. The savings realized from not having to construct a main studio can be utilized to assist RBI in expanding quality programming to a greater number of viewers. Lift Him Up Outreach Ministries, Inc., 3 FCC Rcd 5571 (1988).

To ensure that WNEQ(FM) fulfills its local service obligations to the residents of Taylortown, New Jersey, RBI will have a public affairs representative, who may be a volunteer, available to the community of Taylortown, New Jersey. This representative will, at least on a quarterly basis, conduct interviews and surveys of local community leaders and other residents to ascertain the interests, concerns, and needs of the Taylortown listeners. RBI will then address the recurrent issues, problems, and needs of the residents of Taylortown in its news and public affairs programming. With the savings provided by the requested waiver, RBI will add to the networked RBI programming a variety of public affairs programming focused on Taylortown and its local and surrounding counties, including Essex, Morris and Sussex.

RBI's representative will further serve as a liaison between the residents of Taylortown and RBI's programming personnel. Finally, RBI will maintain a toll-free telephone number, as required by Section 73.1125(d) of the rules, and maintain a public inspection file for WNEQ(FM) at the main studio of its parent station, WFSO(FM), Olivebridge, New York, as required by Section 73.3527 of the Commission's rules, and make reasonable accommodation to listeners wishing to examine the file's contents. As noted above, the map submitted as Exhibit A, demonstrates that Taylortown and Olivebridge, NY (just next to the transmitter site

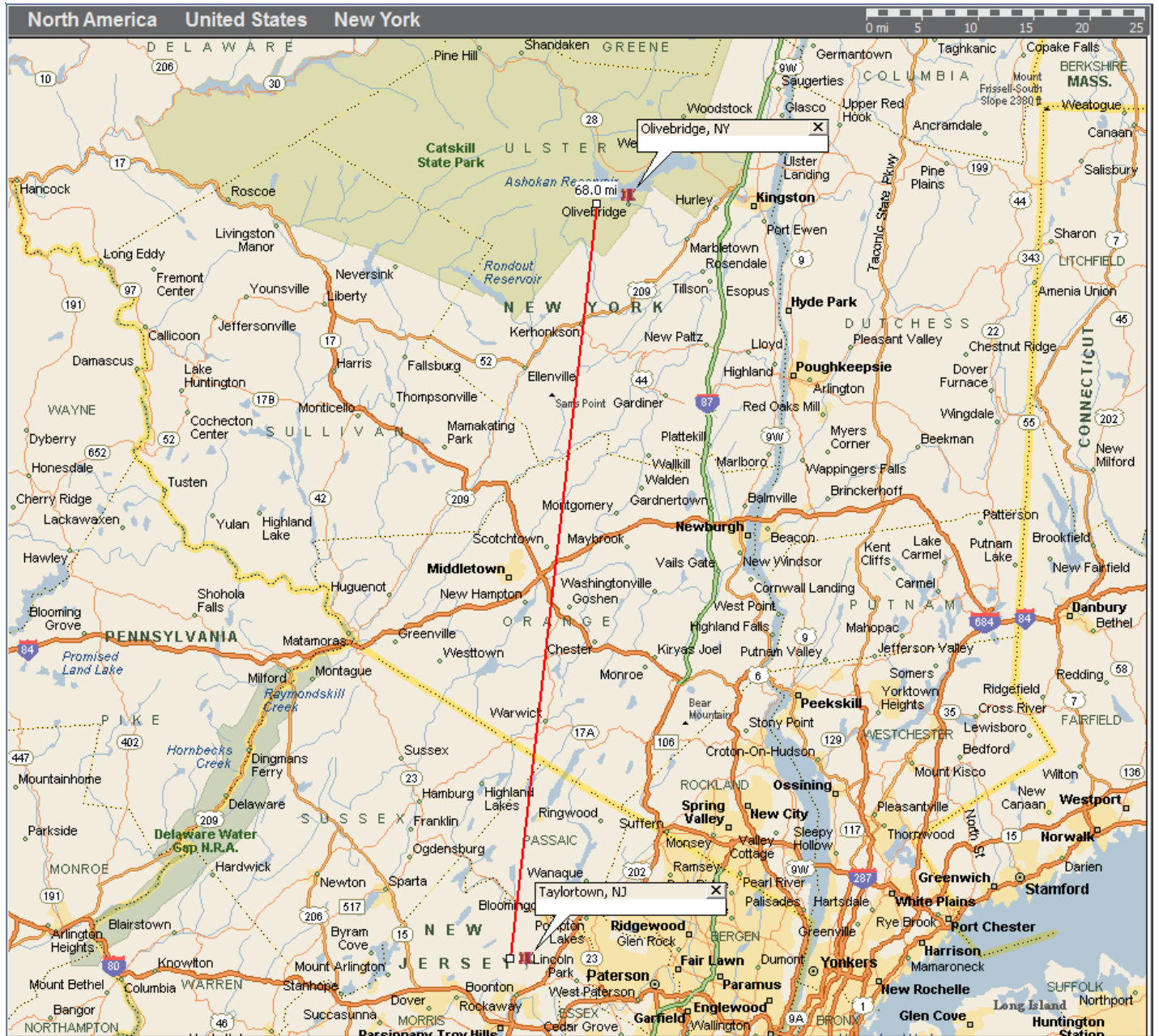
at Butternut Knolls) are only 60 miles apart and are well connected by Interstate 87, only about a 110 minute drive. Exhibit B demonstrates that, WNEQ is only about 40 miles from the 25 mile circle limit of the main studio location rule.

Under Section 73.1125 of the Commission's rules, a broadcast station must maintain its main studio (a) within the station's community of license; (b) at a location within the principal community contour of any AM, FM, or TV broadcast station licensed to the station's community of license; or (c) within 25 miles from the reference coordinates of the center of the station's community of license, except when "good cause" exists for locating the main studio at an alternate location. The Commission traditionally considers waiver requests by noncommercial educational stations on a case-by-case basis. See Main Studio and Program Origination Rules, 3 FCC Rcd 5024 (1988); see also Review of the Commission's Rules Regarding the Main Studio and Local Public Inspection Files of Broadcast Television and Radio Stations, 13 FCC Rcd 15691, 15695 n.18 (1998). In the context of noncommercial waiver requests, the Commission has expressly and implicitly found "good cause" to exist in numerous instances based solely upon a showing that centralized operations will provide an economic benefit to noncommercial stations which have limited funding, provided that local service obligations are met. See Letter to Roy R. Russo, Esq., dated January 24, 1994; Letter to Richard J. Bodorff, dated January 2, 1992; The President and Board of Trustees of the Miami University, 7 FCC Rcd 2902 (1992); The Cedarville College, 6 FCC Rcd 538 (1991); Letter to Gerald Stevens-Kittner, Esq., dated July 15, 1991; Sound of Life, Inc., 4 FCC Rcd 8273 (1989); Lift Him Up Outreach Ministries, Inc., 3 FCC Rcd 5571 (1988); Georgia State Board of Education, 70 F.C.C.2d 948 (1979), recon. denied, 71 F.C.C.2d 227 (1979); Nebraska Educational Television Comm'n, 4 R.R.2d 771 (1965).

RBI respectfully submits that the instant request presents substantially the same showing of good cause and public interest benefits as each of these waivers noted above. In each case, the Commission staff determined that the waivers were justified on the basis of the limited funding available to the stations and the increased efficiencies resulting from co-location of studios. Like these other waiver applicants, RBI will also experience financial difficulties in maintaining separate staffing and separate facilities for its "parent" and "satellite" stations. RBI will also be fully capable of fulfilling its local service obligations in the same manner as each of these other applicants. In this regard, it is worthy of note that these stations are only 60 miles apart and in the same general area. See: Living Faith Ministries, Inc. 21 FCC Rcd 5046 (2006) where studio was located 90 miles and 70 miles from two stations, and is accessible by interstate and U.S. highways.

In view of the foregoing, RBI requests that the Commission find pursuant to Section 73.1125(b)(2) of the Commission's rules that the public interest will be served by the consolidation of WNEQ(FM)'s main studio with WFSO's main studio, and authorize RBI to locate WNEQ(FM)'s main studio outside of the city grade community and contour of the station and more than 25 miles from the reference coordinates of the center of Taylortown, New Jersey .

# Exhibit A



Blue Circles are 25 miles.

