



June 2, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

**Re: Request for Waiver of the Main Studio Rule – Section 73.1125
KSNH, Snowflake, AZ (FIN: 177228)**

Dear Ms. Dortch:

Advance Ministries, Inc. (“AMI”), the permittee of noncommercial educational FM broadcast station KSNH, Snowflake, AZ (FIN: 177228) (the “Station”) is a client of World Radio Link, Inc., and respectfully requests a waiver of the Main Studio Rule, 47 C.F.R. 73.1125, with respect to its proposed operation of the Station. AMI respectfully requests Commission authorization to operate the Station as a satellite of co-owned non-commercial educational FM broadcast station KNLB and to co-locate the Station’s Main Studio at KNLB(FM)’s Main Studio.

Commission precedent and good cause support the requested waiver and it would be in the public interest for the Commission to grant this request. AMI intends to deliver its signal from KNLB (FM) to the Station facility in Snowflake, AZ which is approximately 242 miles from Lake Havasu City, Arizona. AMI anticipates linking the Station to KNLB (FM) through data lines.

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 broadcast stations on a case-by-case basis. In context of waiver requests for noncommercial educational broadcast stations, 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 educational broadcast stations, which have limited funding, provided that local service obligations are met.

Limited funding and economics of scale exist in this case and thus warrant a grant of the request waiver. AMI is an Arizona not-for-profit corporation. As the Commission is aware, there are substantial costs associated with construction, operation, and maintenance of a main studio, including those attributable to equipment purchase, personal wages, and facility rent and utilities. Because AMI intends to originate the vast majority of the Station's programming from KNLB (FM), virtually all of these costs can be saved if AMI's requested waiver is granted. AMI proposes to use these cost savings to more fully equip and staff its KNLB (FM) studio and its Lake Havasu City, Arizona broadcast production facility, where senior AMI management and experienced staff personnel will be available. Co-locating the main studio for the Station at the KNLB(FM) main studio in Lake Havasu City, Arizona will enable AMI to attain the

economies of scale and cost savings necessary to maintain the high quality of its proposed noncommercial educational programming.

Additionally, the City of Snowflake as of July 2003 has a population of 4,788 and is highly unlikely to be able to support the Station. There are limited local resources to provide the type of financial assistance crucial to a non-commercial educational broadcast station dependent on contributions.

AMI is aware of the Station's local service obligations. AMI has developed a plan to allow it to determine the local needs of the Snowflake community and respond to those needs. Specifically, AMI proposes to take the following steps in order to ensure that it ascertains and responds to the problems, needs and interests of the local community:

- Solicit local volunteers to assist AMI in ascertaining issues of local importance and providing programming that addresses the needs and interests of the Snowflake community;
- Monitor local events by communicating with the local volunteers and periodically reviewing the City of Snowflake website (<http://www.ci.snowflake.az.us/>) as well as by regularly reviewing the *White Mountain Independent*, the city's closest newspaper;
- Provide programming targeted to Snowflake, including coverage of significant local news or cultural events;
- Ascertain the needs and interests of the Snowflake community on an on-going informal basis using local volunteers and will conduct formal ascertainment at least once annually to ensure that the station is providing adequate coverage of issues of local importance and is providing programming that addresses the needs and interests of the Snowflake community;
- Broadcast public service announcements of local interest provided by national, state and local organizations;

- Announce on-air website which will allow for the placement of comments from its listeners concerning community Snowflake a toll-free telephone number in compliance with Section 73.1125(e) of the Commission's Rules; and
- In accordance with Commission requirements, establish and maintain a duplicate public file in Snowflake, which will be updated when new material is added to the public file in Lake Havasu City, Arizona.

As shown herein, AMI is committed to ascertaining the local problems, needs and interests of Snowflake, AZ and has demonstrated that it will satisfy its local service obligations. AMI's commitment and this demonstration, in conjunction with the limited funding and economies of scale present in this case, support a finding by the Commission that good cause exists for the requested waiver and that a grant of the waiver would be in the public interest.

Respectfully submitted,

Gene Wisniewski
Consulting Engineer
World Radio Link, Inc.