

**Request For Waiver Of Main Studio Rule**  
(Response to Section VII – Question 13)

The University of Massachusetts (“UMass”), the applicant for a construction permit for a new noncommercial educational FM station to operate at Milford, New Hampshire, hereby respectfully requests a waiver of 47 C.F.R § 73.1125, the Commission’s Main Studio Rule.

In addition to being the applicant for this new noncommercial educational FM station (hereafter the “New NCE Station”), UMass is also the licensee of WUMB-FM, Boston, Massachusetts, among other NCE FM stations in Massachusetts. UMass seeks the instant waiver of the Commission’s Main Studio Rule because UMass desires to operate the New NCE Station as a “satellite” station of WUMB-FM as part of a regional, public educational and cultural radio network. A waiver of the Commission’s Main Studio Rule will permit UMass to conserve valuable resources by co-locating the studio of the New NCE Station with that of WUMB-FM. Since NCE stations are dependent on the support of local residents and sponsors for funding, co-location of the studio for New NCE Station with that of WUMB-FM will permit UMass to direct the savings to expand and develop quality programming to the Milford area as well as the greater Boston area.

Because the Commission recognizes the economic benefits of centralized operations for NCE stations (e.g., due to limited funding), the Commission grants waivers of the Main Studio Rule upon a showing that the subject local community will be served. See Main Studio and Program Origination Rules (Clarification), 3 FCC Rcd 5024 (1988). In the instant case, UMass is committed to regularly producing and broadcasting public affairs and public service programming that specifically addresses the informational, educational, and cultural needs of Milford. To insure that local concerns are addressed, UMass will ascertain issues of public concern to the Milford area by holding annual meetings to provide an opportunity for Milford residents and community leaders to provide direct input concerning the programming of the New NCE Station. Milford community leaders will also be considered for appointment to the existing WUMB-FM Community Advisory Board for further input. UMass also plans to hold an on-air event upon the completion of construction of the New NCE Station to acquaint the Milford community with the station’s personnel, programming, and its operations. To further insure input from Milford residents and community leaders, UMass will maintain a toll free telephone number to the WUMB-FM studio in Boston. Accordingly, the local Milford community will be served and a waiver of the Commission’s Main Studio Rule in the instant case is proper.