

Exhibit 13
The Love Station, Inc.
New Station Application Studio Waiver

Request for Waiver of Main Studio Location Section 73.1125

The Love Station, Inc. ("TLS") requests a waiver of Section 73.1125 of the FCC's rules for a new non-commercial educational FM station, in Altus, OK ("KTHL") to allow TLS to operate KTHL as a satellite of TLS's non-commercial educational station, KJTH, with a main studio at TLS's studio location in Ponca City, OK.

Background

TLS is the licensee of noncommercial radio station KJTH, Ponca City, Oklahoma. KTHL will operate as a complete repeater of KJTH, re-broadcasting 100% of that station's programming.

KJTH Radio is a listener-supported service of TLS. TLS programming is produced at KJTH for distribution over the TLS stations. Use of the TLS facilities in Ponca City as the main studio for KTHL will serve the public interest because it will allow TLS to conserve valuable resources while providing high-quality public radio programming that the Altus community might not otherwise be able to enjoy. Moreover, as demonstrated below, TLS will undertake appropriate efforts and establish appropriate practices in order to ascertain the needs and concerns of the community and to respond to those issues through its programming.

Justification

TLS submits that the requested waiver and satellite status will serve the public interest. By operating KTHL from the existing main studio of KJTH, TLS will be able to provide the highest quality and quantity of public radio offerings to the Altus community. The Commission has stated that "[we] have recognized the benefits of centralized operations for noncommercial educational stations, given the limited funding available to these stations, and we have granted waivers to state and regional public television and radio networks to operate 'satellite' stations that do not necessarily meet the requirements of a main studio," subject to a showing of good cause why the Commission should grant such a waiver.¹

In this case, significant public interest gains will result from collocation of the studio facilities. Specifically, a main studio waiver will allow TLS to conserve valuable financial resources and eliminate the need for unnecessary duplication of equipment and personnel. Conservation of resources is vitally important for listener supported non-commercial educational radio stations such as TLS. Furthermore, TLS's pursuit of a waiver in this case is prompted by its desire to provide its high-quality educational programming services to an area of Oklahoma that might otherwise lack the economic wherewithal to support such a high quality public radio service. Finally, TLS's commitment to serve

¹ See *In re Main Studio and Program Origination Rules for Radio and Television and Television Broadcast Stations*, Memorandum Opinion and Order, 3 FCC Rcd 5024 (1988).

the educational needs of the Altus community through high quality educational programming will ensure that KTHL serves the needs of its community of license despite the lack of a local main studio.

Collocating the main studio for KTHL with KJTH in Ponca City will allow TLS to fulfill its educational mission in a manner consistent with the realities of the public broadcasting funding situation. TLS is a non-commercial educational radio station, totally dependent upon our listeners for all of its operating revenues. Consequently, it is vitally important for TLS to conserve financial resources wherever possible, as an extra expense in one area of its operations means fewer resources available for other, no less important or valuable, programs. By eliminating the need for duplicative studio, personnel, and administrative costs, a consolidated main studio operation in Ponca City will enhance TLS's capability to provide quality national and local public radio programming to listeners throughout Altus and the surrounding community. Without this mode of operation, it would be difficult for TLS to both maintain a separate local studio, and provide high quality programming. TLS already utilizes its Ponca City studio as a recording studio and production space for KJTH. Thus, allowing KTHL to take advantage of the administrative and technical facilities currently in place in Ponca City will be of particular benefit to TLS as it strives to provide varied public radio programming to Altus and the surrounding community in a cost-conscious manner.

For the following reasons, the grant of a main studio waiver will also not have an adverse effect on the ability of TLS to ascertain the needs of the Altus community and address them through its programming:

- Altus citizens will be able to make contact with TLS via an active toll-free number that permits residents throughout the United States to reach the TLS office without long-distance charges.
- TLS will monitor the online edition of the state wide newspapers, in addition to being alerted for Altus-area local news media coverage from other sources.
- TLS maintains an up-to-date website at www.theHouseFM.com, which enables listeners to comment on programming via e-mail, and obtain extensive information about TLS's network schedules, programs and events.
- TLS's website also provides an interactive community calendar that allows individuals and organizations anywhere (including Altus) to submit information about upcoming events.
- TLS will add to its Community Advisory Board at least one resident of the community of Altus, who will be asked to provide recommendations on community needs and programming directly to the management of TLS.
- TLS will assess community needs and problems through the analysis of audience mail, email, informal surveys and meetings.
- TLS will provide periodic local programming for Altus including, but not limited too, coverage of significant local news, weather or cultural events.

These efforts will help TLS, as licensee of KTHL, to select programming that is responsive to the needs of the Altus community. In addition, TLS will also address community needs through its programming. TLS will also provide listeners with access to national news programming and programs such as *SRN News* and *Focus on the Family*. Love submits that its commitment to ascertain and serve the needs of the [Altus community by providing high quality public radio programming, the likelihood that the Altus community might not otherwise be able to support a comparable standalone noncommercial public radio outlet, and the necessity of conserving financial resources justify the grant

of a main studio waiver. Accordingly, TLS respectfully requests waiver of Section 73.1125 of the Commission's rules to locate the main studio for KTHL in Ponca City, Oklahoma. TLS submits that the public interest will be served by authorizing KTHL as a satellite without a local main studio, as part of a collocated operation at the studios of TLS's noncommercial educational station, KJTH.