

**University of Utah, Assignee
KYLZ(FM) (Fac. ID 170181), Parowan, UT**

**Exhibit 18
Annex A (Amended)
FCC Form 314
Section III, Item 6**

Main Studio Waiver Request

As described in a pending Form 314 assignment application (BALH-20160415AAL), the University of Utah (the “University”) is the proposed assignee of FM radio station KYLZ(FM), Parowan, Utah, which the University would operate as a noncommercial educational station upon assignment and formal conversion to NCE status. To ensure that the University can most efficiently and effectively operate KYLZ(FM) in service to Utah listeners, the University has respectfully requested a waiver of Section 73.1125(a) of the Commission’s rules (the “main studio rule”) to be granted concurrently with the assignment application. The requested waiver of the main studio rule would permit co-location of the KYLZ(FM) main studio with the main studio of KUER(FM), which is licensed to the University in Salt Lake City and is located approximately 230 miles from Parowan.

Upon its acquisition, the University will operate KYLZ(FM) as a “satellite” station of KUER(FM), so that KYLZ(FM) will be part of the statewide network of full-power and translator stations that the University employs to provide a noncommercial mix of National Public Radio (“NPR”), BBC, local and regional news and information programming to listeners throughout the state of Utah. The Commission previously has granted main studio waivers to the University to co-locate the main studios of the other full-power satellite stations of KUER(FM) with the main studio of KUER(FM) in Salt Lake City. Specifically, the Commission has authorized the University to co-locate the main studios of KUHU(FM), Monticello, UT;

KUOU(FM), Roosevelt, UT; KUXU(FM), Monroe, UT; and KUEU(FM), Logan, UT, with KUER(FM)'s main studio.

The University is a state governmental entity with limited financial resources available for its broadcasting activities, and co-location of KYLZ(FM)'s main studio with that of KUER(FM) will enable the University to realize important efficiencies and economies of scale. The Commission long has "recognized the benefits of centralized operations for NCE stations, given their limited funding, and thus has found good cause exists to waive the main studio location requirement where satellite operations are proposed," as is the case here.¹ The waiver requested herein is particularly appropriate given the difficulty in providing FM coverage to a large state such as Utah, which the University traditionally has served through its network of five main stations (KUER, KUHU, KUOU, KUXU, and KUEU) and more than 30 translators.

In addition, the University takes seriously its local service obligations and will ensure fulfillment of those obligations. The University will maintain a public inspection file in KYLZ(FM)'s community of license and a toll-free number to reach the main studio will be available throughout the service area. The University already ascertains community issues and needs in rural areas like Parowan, and will continue to do so in a variety of ways. For instance, KUER and its satellites have aired local, remote broadcasts from communities such as Cedar City, Kanab, Park City, and Moab. KUER also produces a daily hour-long interview program, RadioWest, which allows listeners from across the state to call in with their views and questions, and sends reporters to cover local stories in cities and towns across the state. Moreover, listeners can and do contact KUER directly through e-mails, phone calls, and postal mail with questions,

¹ *Applications of Delmarva Educational Association*, Memorandum Opinion & Order, 19 FCC Rcd. 6793, 6798 (2004).

concerns, and suggestions, and KUER responds to all such inquiries. Finally, KUER receives comments about its programming from hundreds of listeners from across the state during its periodic fundraising drives. In short, KUER maintains a close connection to all the communities it serves, and the same would be true of the communities served by KYLZ.

Accordingly, good cause exists to permit the co-location of the main studio of KYLZ(FM) with that of KUER(FM) upon the University's purchase of KYLZ(FM), and such operation will be consistent with the operation of KYLZ(FM) in the public interest. *See* 47 C.F.R. § 73.1125(b)(2). The University respectfully requests that the main studio waiver requested herein be granted.