

MAIN STUDIO LOCATION

The applicant seeks a waiver of 47 CFR 73.1125(a)(1), which concerns the required location of a station's main studio. As contemplated in 47 CFR 73.1125(a)(4), the applicant believes that there is good cause to locate the station's main studio outside of the principal community contour and that such operation is consistent with the public interest.

The main studio for the proposed stations is to be co-located with the main studio of KLCC at Eugene, Oregon. KLCC is licensed to the applicant, Lane Community College ("LCC"). LCC is committed to the goal of providing high quality educational programming to all the citizens of Roseburg even though economic realities preclude the operation of a studio in this community.

Even without a main studio in the service area of the proposed station, LCC will determine local needs by a variety of methods and respond to them in its programming.

LCC will:

- Establish and maintain a toll free telephone number to permit the public to reach the studios of KLCC in Eugene, without charge;
- Conduct ascertainties of community needs in the proposed service area on a quarterly basis. Surveys will be distributed to community leaders and be made available to the public at least quarterly. The results of these surveys will be used in the development of the licensee's Issues lists and the licensee will provide programming that addresses the most commonly identified issues;
- Subscribe to a local newspaper. Each issue of the paper will be reviewed by the licensee's news staff. The licensee will assign a reporter to cover important issues identified by this review.
- News, public affairs (e.g. election coverage), and other programming is aired by the applicant on a regular basis. Such programming will include coverage of issues affecting Roseburg such as issues uncovered by the applicant's ascertainment efforts as described above.

Co-locating the main studio with the KLCC facilities in Eugene will enable LCC to provide high quality non-commercial public affairs and educational programming to a significantly expanded audience. The Commission has previously “recognized the benefits of centralized operations for non-commercial educational stations, given the limited funding available to these stations, and [has] granted waivers to ... regional public television and radio networks” MO&O, MM Docket 86-406, 3 FCC Rcd. 5027 (1988).

The Commission has routinely granted waiver of the main studio rule in similar circumstances. See MO&O, MM Docket 86-406, 3 Rcd. At 5027; Public Radio and Television Programming (NPRM), 87 FCC 2d 716, 728-29 (1981); Georgia State Board of Education, 70 FCC 2d 948, 957, recon. Denied, 71 FCC 2d 227 (1979).

Therefore, the applicant believes that this request for a waiver of 47 CFR 73.1125(a)(1) is in the public’s best interest, convenience, and necessity and respectfully requests that it be granted.