

MAIN STUDIO WAIVER REQUEST
MONTANA STATE UNIVERSITY-BILLINGS

The applicant seeks a waiver of 47 CFR §73.1125(a) (1), which requires that a station's main studio be located within its principal community contour. 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 station is to be established at the studios of applicant's main studio for its Miles City, Montana station, KYPR. KYPR is licensed to the applicant, a not-for-profit educational corporation organized under the laws of the State of Montana. Applicant is committed to the goal of providing high quality educational programming to all of its listeners, even though economic realities preclude the provision of a full schedule of programming tailored to each individual community. Given the low population density of the proposed community and the surrounding region, it is unlikely that resources will ever be available to provide independently programmed local stations at most communities in the region.

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

Applicant will:

- Establish a toll free telephone number to permit the public to reach the Main Studio without charge;
- Maintain a Public Inspection File in the proposed community;
- Conduct ascertainties of community needs in the proposed service area.
- Subscribe to local newspapers and publications.

Locating the station's proposed station in the above community will enable Applicant, to provide high quality non-commercial public affairs and educational programming to a significantly expanded and unserved 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..." See MO&O, MM Doc. No. 86-406, 3 FCC Rcd 5027 (1988).

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.