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Federal Communications Commission
Office of the Secretary

Washington, D.C. 20554

445 12th Street, S.W.

Federal Communications Commission

Secretary

Ms. Marlene H. Dortch

February 3, 2017

Dear Ms. Dortch:

On behalf of LifeTalk Radio, Inc., ("LTR"), this is to request a waiver of the Main Studio Rule, §73.1125(a) of the Commission's rules, with respect to its noncommercial FM station KCSH, Ellensburg, Washington (Facility ID #81756). LTR proposes to collocate the main studio for KCSH with the main studio for its co-owned AM noncommercial station, WBLC, Lenoir City, Tennessee (Facility ID #36691).

Pursuant to §73.1125(a) of the Commission's rules, each broadcast station is to maintain a main studio in or near the community of license. However, when good cause exists, §73.1125(b)(2) permits a station to establish its main studio at a location other than that described in §73.1125(a), "when so doing would be consistent with the operation of the station in the public interest"

The FCC has recognized the benefits of centralized operations for NCE stations, given their limited funding. Such benefits have been deemed adequate "good cause" to justify waiver of the main studio location requirement. See *Main Studio and Program Origination Rules*, 3 FCC Rcd 5024, 5027 (1988). LTR's finances are limited and the savings to be realized from reduced requirements on the premises of KCSH would help the organization in its efforts to provide a high quality of service to the public. Toward that end, LTR proposes to collocate the main studio for KCSH with the main studio for its co-owned station, WBLC, Lenoir City, Tennessee. KCSH will broadcast substantially the same programming as WBLC and operate as a satellite station.

Ms. Marlene H. Dortch
February 3, 2017
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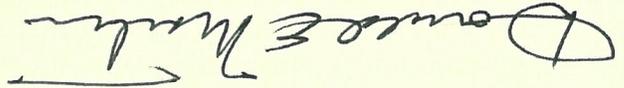
LTR acknowledges that as the licensee of KCSH, it has certain local service obligations to the station's community of license and service area. LTR intends to operate the station to benefit the residents of the service area and to broadcast programming responsive to the community's needs and interests. Accordingly, LTR proposes as follows:

1. A toll-free telephone number will be available for the residents of the KCSH service area to use to contact station personnel.
2. KCSH will engage a local public affairs representative, who may be a volunteer, to develop and maintain local contacts with community leaders in the KCSH service area and who will ascertain local needs and interests at least once per calendar quarter. Programming will be aired to address those local needs and interests. The local representative will serve as a liaison between the residents of the KCSH service area and LTR's programming personnel.

As counsel for LTR, the undersigned hereby certifies that neither LTR nor anyone who is a party to this request is subject to the denial of federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988.

Thank you for your consideration. Please contact the undersigned should you have questions concerning this request.

Very truly yours,



Donald E. Martin

Counsel for LifeTalk Radio, Inc.

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February 22, 2017

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street, S.W.

Washington, D.C. 20554

RE: Amendment to Request for Waiver of 47 CFR 73.1125

KCSH(FM), Ellensburg, Washington

LifeTalk Radio, Inc.

Facility ID #81756

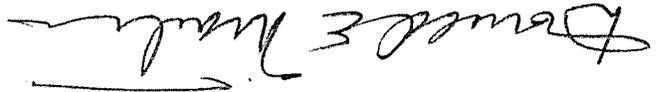
Dear Ms. Dortch:

On behalf of LifeTalk Radio, Inc., ("LTR") this is to provide additional information by way of an amendment to LTR's February 3, 2017 request for a waiver of the Main Studio Rule for KCSH, Ellensburg, Washington (Facility ID #81756).

The original documents for the KCSH public inspection file will be maintained at the requested new location for the main studio, co-located with the main studio for WBLC, Lenoir City, Tennessee. A duplicate copy will be maintained at KCSH facilities in Ellensburg, Washington. Of course, these arrangements will be superseded by the establishment of online public files when the KCSH public inspection file goes online on the FCC's public file website, on or before March 1, 2018.

Thank you for your consideration. Please contact the undersigned should you have questions concerning this request.

Very truly yours,



Donald E. Martin

Counsel for LifeTalk Radio, Inc.