

Exhibit XIII

Request for Special Operating Conditions

In accordance with FCC Rule 73.1125 (b)(2), Eastern New Mexico University (ENMU) Licensee of KENW and KMTH FM, request special consideration "to locate the main studio at a location other than that described in paragraph (a) of this section." ENMU believes that doing so would i) "would be consistent the operation of the station," ii) preserve and protect a valuable and important public resource, and iii) "be consistent with the public interest."

Eastern New Mexico University (ENMU), licensee of KENW and KMTH, is submitting applications to protect and preserve a local and long-established public, state supported, radio network consisting of full service and translator broadcast stations. The service provided by this network is threatened by encroachment from new, mutually exclusive, applicants.

The grant of full service construction permits to ENMU will allow upgrading translator stations that were built and are operating with funds provided by the U.S. Department of Commerce NTIA / PTFP, the Corporation for Public Broadcasting, and the State of New Mexico. As such, the State of New Mexico and the Federal government have a priority interest in sustaining the licenses, facilities and public radio broadcast service provided by the network.

Translator stations extend the primary coverage areas beyond the 60 dBu contour of KENW and KMTH to serve small, rural, remote and underserved communities that would not otherwise receive local and regional public radio news, information, directed emergency (EAS) and educational content. In addition, many of our translators provide the only practical and economical means of providing local service by "daisy chaining" or "repeating" signals from one facility to another due to the remote locations and non-existing or primitive infrastructure of the region. It is therefore crucial to sustain these facilities from encroachment. KENW, KMTH and associated translators are part of a regional New Mexico State public radio network relied upon to deliver programming unique to the residents of New Mexico. This state network also provides programming of national and international interest from National Public Radio.

In most cases, our translator network has provided the first NCE aural broadcast service to remote Eastern New Mexico communities. The existing FM broadcast station network should be preserved and protected from encroachment of non-local applicants whose mutually-exclusive construction of full service reserved channel facilities will effectively eliminate public radio service provided by long-established, CPB qualified stations in these communities. Program content delivered solely by distant satellite providers is at odds with Congressional intent and the "localism" provisions of the Communications Act and should not be permitted to displace established, local NCE public radio stations.

We submit that the preservation and protection of this public radio network provides good and sufficient cause, and locating main studio facilities at a location other than

within the principal communities' contour is consistent with the operation of stations in the public interest.

ENMU desires to upgrade and protect all existing FM translators stations to primary, full service status, but we are limited by the current rules of this filing window. Below are the FM broadcast stations that comprise the state supported public radio network in Eastern New Mexico and west Texas. Facilities for which we are requesting full service protection are in bold font:

CALL SIGN	COMMUNITY OF SERVICE	CLASS OF SERVICE
KENW-FM	PORTALES, NM	FULL SERVICE
KMTH-FM	MALJAMAR, NM	FULLSERVICE
K202CX	CONCHAS DAM, NM	TRANSLATOR
K214BT	MONTOYA, NM	TRANSLATOR
K215BG	ANDREWS, TX	TRANSLATOR
K215DT	APACHE SPRINGS, NM	TRANSLATOR
K216BJ	ROSWELL, NM	TRANSLATOR
K217BD	RUIDOSO, NM	TRANSLATOR
K217BY	QUAY, NM	TRANSLATOR
K219DP	FT. SUMNER, NM	TRANSLATOR
K221DM	WAGON MOUND, NM	TRANSLATOR
K228DP	CLAYTON, NM	TRANSLATOR
K258AO	MIDLAND, TX	TRANSLATOR
K283AC	TUCUMCARI, NM	TRANSLATOR
K284AC	RATON, NM	TRANSLATOR
K285EN	ROY, NM	TRANSLATOR
K291AD	DES MOINES, NM	TRANSLATOR
K296EN	LAS VEGAS, NM	TRANSLATOR