

REQUEST FOR WAIVER OF MAIN STUDIO RULE

West Central Michigan Media Ministries (“WCM”) requests a waiver of §73.1125(a) of the Commission’s rules with respect to FM station WKKM, Harrison, Michigan (Facility ID #174240), to become effective upon the grant and consummation of the assignment application.

WCM is a nonprofit corporation. WKKM is a noncommercial station operating on a reserved FM channel.

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). WCM’s finances are limited and the savings to be realized from reduced requirements on the premises of WKKM would help the organization in its efforts to provide a high quality of service to the public. Toward that end, WCM proposes to co-locate the main studio for WKKM with the main studio for its co-owned station, WGCP, Cadillac, Michigan. WKKM will broadcast substantially the same programming as WGCP.

WCM acknowledges that as the licensee of WKKM, it will have certain local service obligations to the station’s community of license and service area. WCM 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, WCM proposes as follows:

1. A duplicate public inspection file for WKKM will be maintained in the station’s community of license. (The original copy of the public inspection file will be maintained at the main studio at WGCP.)
2. A toll-free telephone number will be available for the residents of the WKKM service area to use to contact station personnel.
3. WCM will engage a local public affairs representative, who may be a volunteer, to develop and maintain local contacts with community leaders in the WKKM 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 WKKM service area and WCM's programming personnel.