

LA PROMESA FOUNDATION
KYRT(FM), HUNT, TEXAS
FCC FORM 302-FM
MAIN STUDIO WAIVER/SATELLITE STATUS REQUEST

This is to respectfully request that the Commission, upon consummation of the transactions through which La Promesa Foundation will acquire the license for FM Broadcast Station KYRT, Hunt, Texas, grant authorization for Station KYRT to be a satellite of co-owned non-commercial educational station KLPF(AM), Midland, Texas. Further, this is to request that the Commission grant a waiver of Section 73.1125 of the Commission's Rules so that the main studio for KYRT station can be co-located with the studio of KLPF at 1903 South Lamesa Road, Midland, Texas; the program material for KYRT would be delivered via satellite feed system (or other satisfactory method) from the Midland location to the KYRT transmitter site near Eola in Concho County, Texas.

Preliminary Statement

La Promesa Foundation is a non-stock, non-profit corporation chartered in Texas with tax-exempt status granted by the Internal Revenue Service pursuant to 26 U.S.C. §501(c)(3). This request is submitted as part of an FCC Form 302-FM application to change the status of KYRT from commercial to "non commercial educational".

LPF is the licensee of a number of non-commercial educational stations, including KLPF(AM), Midland, Texas, FIN 17235. LPF identifies its programming as the "Guadalupe Radio Network".

Satellite Status/Main Studio Location Rule Waiver

The KLPF(AM) studio site (at NAD27 coordinates 31° 58' 55" North and 102° 03' 29" West) is 282.531 airline miles (454.69 kilometers) west-northwest (298.93°) of the Hunt, Texas reference coordinates stated in the United States Geological Survey's "Geographic Names Information System", 30° 04' 15" North and 99° 20' 16" West. LPF seeks that KYRT be designated

as a "satellite" of KLPF(AM) and that a waiver of Section 73.1125 be granted. "Satellite" status has been granted in the past to a number of stations licensed to LPF, including: KBMD(FM), Marble Falls, Texas (FIN 86792), Ref. No. 20050729DYO, November 21, 2006; KWMF(FM), Pleasanton, Texas (FIN 55415), Ref. No. 20080580ACO, March 5, 2009; KJMA(FM), Floresville, Texas (FIN 72878), Ref. No. 20080508ACP, March 5, 2009; KQOA(FM), Morton, Texas (FIN 171699), File No. BLED-20100825AAG, granted October 13, 2010; WQHC(FM), Hanceville, Alabama (FIN 57437), File No. BML-20111011AOI, granted December 8, 2011; KIVM(FM), Fredericksburg, Texas (FIN 171707), File No. BLED-20120217ABU, granted March 7, 2012; KGWU(FM), Uvalde, Texas (FIN 69620), File No. BML-20120301AET, granted March 30, 2012; KQOS(FM), Albany, Texas (FIN 171817), File No. BLED-20120706AAT, granted July 19, 2012; and KSHJ(AM), Houston, Texas (FIN 33747), File No. BML-20121114AGN, granted March 21, 2013.

The requested waiver would be invaluable to assisting LPF in preserving scarce resources derived from its listener support in order to provide the unique high-quality program service that LPF provides to Hunt, Kerr County and surrounding areas.

With respect to public interest benefits to be achieved by a "satellite operation", by consolidating the operation at LPF's studios in Midland, we estimate that we can save at least \$50,000 per year in rent, salaries and other related costs. With the money we save, we can improve the program service that we will provide to Hunt and the surrounding region. LPF is a section 501(c)(3) corporation, and its revenues come from donations. Further, the Midland location gives LPF a more centralized headquarters location, as LPF is involved in broadcast operations in a number of Texas markets.

In order to better ascertain the needs and interests of the KYRT listening area and to provide programming to Hunt and Concho County, LPF proposes to take the following steps: (1) LPF will subscribe to *The Daily Times*, a newspaper of general circulation serving Hunt and other communities in Kerr County, Texas; (2) on a quarterly basis, LPF will conduct interviews with Hunt area leaders and residents; (3) LPF will form an advisory council with at least one resident of the Hunt area serving on it; (4) LPF will develop periodic local programming

for Hunt and vicinity including coverage of news and cultural events; and (5) LPF will provide the broadcast of local public service announcements of interest to Hunt and area residents.

To facilitate listener input, we maintain (1) a "contact us" feature on our website, www.grnonline.com, and (2) a nationwide toll-free telephone number which can be used by everyone within the KYRT service area, 1-888-784-3476.

The Commission has on previous occasions waived the Main Studio Rule to permit "satellite" operation. See e.g. *American Family Association (Marksville, Louisiana)*, 12 FCC Rcd 15128 (1997).

The public interest, convenience and necessity would be well served by a grant of this request.