

May 26, 2010

FILED/ACCEPTED**VIA HAND DELIVERY**Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20554**MAY 26 2010**Federal Communications Commission
Office of the Secretary**Re: Main Studio Relocation and Request for Main Studio Waiver
WOKR(FM), Remsen, New York (FIN: 465)**

Dear Ms. Dortch:

On behalf of Educational Media Foundation ("EMF"), the licensee of noncommercial, educational FM station WOKR(FM) in Remsen, New York, we hereby respectfully request a waiver of Section 73.1125 of the Commission's rules (hereinafter referred to as the "main studio rule") to permit the relocation of the main studio of the WOKR from its current location in Middletown, California to the main studio of EMF's co-owned station KGCL(FM), Jordan Valley, Oregon. The proposed studio location is approximately 3,311 kilometers (2,058 miles) outside of the 3.16 mV/m contour of WOKR. The main studio waiver that permits the location of the WOKR main studio at WGCX(FM) Wilmore, Kentucky¹, granted on February 5, 2009² was never effectuated, and EMF requests that the Commission grant the instant request instead.

On November 20, 2007, Commission staff granted EMF's initial waiver request,³ authorizing EMF to operate WOKR as a satellite of EMF's co-owned noncommercial, educational FM station KLRD, Yucaipa, California and later granted EMF's request for relocation to EMF's co-owned noncommercial educational FM station KLVR, Middletown, California (formerly licensed to Santa Rosa, California)⁴. EMF now proposes to operate WOKR as a "satellite" station of its co-owned station KGCL, Jordan Valley, Oregon.

As a satellite of KGCL, WOKR will now become part of a network of radio stations operated by EMF known as "God's Country Radio Network," and the station will broadcast the God's Country Radio programming. EMF is a non-profit corporation and each network station operates noncommercially and broadcasts the type of noncommercial educational programming carried on the God's Country Radio Network. By co-locating WOKR's main studio at KGCL's

¹ WGCX(FM) was formerly WLAI(FM) Danville, Kentucky.

² See File No. -20080516ACB.

³ See File No. BMLED-20070816ACF.

⁴ See File No. -20071220ACP.

main studio in Jordan Valley, EMF will continue to realize valuable economies of scale and cost savings, which are needed to maintain the high quality of God's Country noncommercial educational programming. As a listener-supported station, WOKR will face severe financial constraints. The obligation to maintain separate staffing and studio locations for both WOKR and KGCL will place a serious financial burden on EMF and divert what limited resources are available from God's Country's programming efforts.

To ensure that WOKR fulfills its local service obligations to the residents of Remsen, New York, EMF will have a local public affairs representative, who may be a volunteer, available in the community of Remsen, New York. This local representative will, at least on a quarterly basis, conduct interviews and surveys of local community leaders and other residents to ascertain the interests, concerns, and needs of the Remsen listeners. EMF will then address the recurrent issues, problems, and needs of the residents of Remsen in God's Country's news and public affairs programming.

EMF's local representative will further serve as a liaison between the residents of Remsen and EMF's programming personnel. EMF will continue to maintain a toll-free telephone number, as required by Section 73.1125(d) of the rules. Finally, from the effective date of relocation, EMF will maintain its public inspection file for WOKR at the main studio of its parent station, KGCL(FM), Jordan Valley, Oregon, as required by Section 73.3527 of the Commission's rules, and make reasonable accommodation to listeners wishing to examine the file's contents.

Under Section 73.1125 of the Commission's rules, a broadcast station must maintain its main studio (a) within the station's community of license; (b) at a location within the principal community contour of any AM, FM, or TV broadcast station licensed to the station's community of license; or (c) within 25 miles from the reference coordinates of the center of the station's community of license, except when "good cause" exists for locating the main studio at an alternate location. The Commission traditionally considers waiver requests by noncommercial educational stations on a case-by-case basis. See Main Studio and Program Origination Rules, 3 FCC Rcd 5024 (1988); see also Review of the Commission's Rules Regarding the Main Studio and Local Public Inspection Files of Broadcast Television and Radio Stations, 13 FCC Rcd 15691, 15695 n.18 (1998). In the context of noncommercial waiver requests, the Commission has expressly and implicitly found "good cause" to exist in numerous instances based solely upon a showing that centralized operations will provide an economic benefit to noncommercial stations which have limited funding, provided that local service obligations are met. See Letter to Roy R. Russo, Esq., dated January 24, 1994; Letter to Richard J. Bodorff, dated January 2, 1992; The President and Board of Trustees of the Miami University, 7 FCC Rcd 2902 (1992); The Cedarville College, 6 FCC Rcd 538 (1991); Letter to Gerald Stevens-Kittner, Esq., dated July 15, 1991; Sound of Life, Inc., 4 FCC Rcd 8273 (1989); Lift Him Up Outreach Ministries, Inc., 3 FCC Rcd 5571 (1988); Georgia State Board of Education, 70 F.C.C.2d 948 (1979), recon.

Marlene H. Dortch, Secretary
May 26, 2010
Page 3

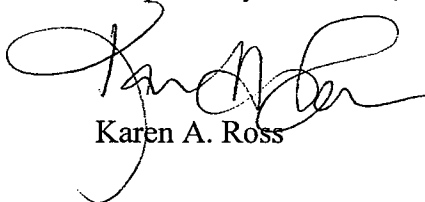
denied, 71 F.C.C.2d 227 (1979); Nebraska Educational Television Comm'n, 4 R.R.2d 771 (1965).

EMF respectfully submits that the instant request presents substantially the same showing of good cause and public interest benefits as each of these waivers noted above. In each case, the Commission staff determined that the waivers were justified on the basis of the limited funding available to the stations and the increased efficiencies resulting from co-location of studios. Like these other waiver applicants, EMF will also experience financial difficulties in maintaining separate staffing and separate facilities for its "parent" and "satellite" stations. EMF will also be fully capable of fulfilling its local service obligations in the same manner as each of these other applicants.

In view of the foregoing, EMF requests that the Commission find pursuant to Section 73.1125(b)(2) of the Commission's rules that the public interest will be served by the consolidation of WOKR's main studio with KGCL's main studio, and authorize EMF to relocate WOKR's main studio from its current location in Middletown, California to the main studio of KGCL in Jordan Valley, Oregon.

As EMF is a noncommercial entity there is no fee associated with this filing. If there should be any questions regarding this matter, please contact the undersigned.

Respectfully submitted,



Karen A. Ross