

AMENDED AND RESTATED REQUEST FOR WAIVER OF MAIN STUDIO RULE

Intermountain Public Radio, Inc. ("IPR"), is the proposed assignee of Noncommercial FM Radio Station KWSD(FM), Kettleman City, California (FIN: 94214). Pursuant to Section 73.1125(b)(2) of the Commission's Rules, IPR hereby requests that, upon consent to and consummation of the pending assignment of license, from Calvary Church of Costa Mesa, Inc. to IPR, that the Commission waive its main studio rule, Section 73.1125(a), in order to permit KWSD to be operated as a satellite of IPR's Noncommercial Educational FM Station KTYN(FM), Thayne, Wyoming (FIN: 93901) ("KTYN"). Such a main studio rule waiver "would be consistent with the operation in the public interest" as provided for in Section 73.1125(b)(2).

The Commission recognizes the benefits of centralized operation for noncommercial broadcasters given their limited resources, which is applicable in this instance.<sup>1</sup> In connection therewith, the Commission has granted waivers of the main studio rule to enable noncommercial educational network groups to operate satellite stations that do not necessarily meet the requirements of a main studio, provided that the NCE licensee otherwise fulfills its local community service obligations. *Amendment of Sections 73.1125 and 73.1130 of the Commission's Rules, the Main Studio and Program Origination Rules for Radio and Television Broadcast Stations*, 3 FCC Rcd 5024, 5027 (1988); *Board of Visitors of James Madison University*, 8 FCC Rcd 1751, 1752 (MMB 1993).

IPR, which is currently the licensee of two NCE stations, KTYN and Station KRBR(FM), La Barge, Wyoming, has a history of serving the needs and interests of the communities it serves. IPR now wishes to expand its geographical footprint and provide

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<sup>1</sup> IPR wishes to take note that KWSD is currently silent and IPR will be using its resources to resume station operations and return broadcasting service to the public.

additional service to the residents of the Central Valley of California. In doing so, it pledges to meet its local service obligations for listeners served by KWSD.

In connection with its service pledge, IPR makes the following specific commitments in support of the instant request:

1. IPR will meet regularly, but in no event less than quarterly, with both community leaders and its listeners in order to ascertain their needs and interests;
2. IPR will provide programming responsive to and specifically addressing the needs and interests its ascertains;
3. IPR will make arrangements for its listeners to communicate directly with IPR, through an Internet website and other evolving telecommunications means, such as Facebook, concerning programming and station operations and will encourage KWSD's listeners to do so;
4. IPR will maintain a toll-free telephone line allowing KWSD listeners contact KWSD management;
5. IPR will maintain the KWSD local public file in the community of license, subject to such changes as the Commission makes in the location of noncommercial educational radio stations' public inspection files.

Under comparable circumstances, the Commission has previously concluded that the public interest is served by the grant of main studio waivers similar to that being requested herein. *Delmarva Educational Association*, 19 FCC Rcd 6793, 6797-6798 (2004).

Considering that a basis exists for the requested waiver, the Commission should give due consideration to granting a main studio waiver in this instance.

For the foregoing reasons, upon consent to and the assignment of KWSD, IPR respectfully requests that Section 73.1125(a) be waived with respect in order to permit KWSD to operate without a main studio on a satellite station basis.