

## **Request for Waiver of Main Studio Rule**

CSN International ("CSN") hereby seeks a waiver of the Commission's main studio rule: 47 CFR 73.1125. CSN intends to operate KIHS, Adel, Iowa facility as a broadband facility for broadcasting the programming of commonly-owned educational FM station KRSS, Tarkio, Missouri.

Although operating as a broadband facility, CSN will ascertain from community leaders and citizens the needs and interests of Adel, Iowa. CSN will appoint a local representative to monitor local issues of interest to community residents and produce specific programming to address the special needs that are unique to Adel, Iowa, and other cities in the area. KRSS, Tarkio maintains a website and further information will be added to this web page that will specifically pertain to the Adel area and be of interest to listeners of KIHS. The Public File for KIHS will also be viewable on the KRSS web page.

CSN has proven through our other broadband stations, WJII, Norlina, North Carolina, WPJC, Pontiac, Illinois and WPGT, Roanoke Rapids, North Carolina, that we have been able to gather information and air programming of this type to meet the needs in these communities. We know that we can do the same in the Adel, Iowa area and that it will be a benefit to our listener supported station KIHS to do so.

In accordance with Review Of The Commission's Rules Regarding The Main Studio And Local Public Inspection Files Of Broadcast Television And Radio Station (Memorandum opinion and order), MM Docket No. 97-138, released May 28, 1999, CSN will maintain a public file at its main studio and, pursuant to 47 CFR 73.1125(d), will maintain a local or toll-free telephone number at Adel, Iowa.

As allowed by FCC regulations CSN International is requesting a studio waiver for KIHS, Adel, Iowa along with this minor modification application. CSN maintains a studio facility in Tarkio, Missouri, 95 miles away. The additional program material referred to in our program statement will be added when KIHS, Adel, Iowa is built.

As it is with respect to other stations for which a waiver of the main studio rule has been granted, upon grant of this request, CSN International will satisfy the needs and interests of residents of Adel, Iowa by the following means:

First, CSN will maintain a toll free telephone line by which the residents of the community can reach CSN management to express concerns about station operations.

Second, CSN maintains a web page not only for CSN International but also KRSS maintains its own web page which permits listeners locally as well as throughout the entire CSN network and beyond to have input regarding the programming broadcast on all CSN stations. A public file for KIHS will be maintained not only at the studio of KRSS, but also on the web page of KRSS making public access to information pertaining to KIHS easier.

Third, CSN will appoint a local representative in the Adel area who will keep KRSS's management up to date of local issues of interest and concerns to Adel listeners. CSN will work hard each year to ascertain the needs of Adel and the surrounding communities and then broadcast local programming that will address those needs.

Fourth, CSN employees will themselves periodically visit Adel to ascertain community issues, publicizing these visits in advance, over the air, and identifying a time and place where local residents may meet with CSN management.

Fifth, CSN will provide for the broadcast of news and public service announcements pertinent to Adel residents addressing the issues ascertained by KRSS and CSN management.

In summary, CSN International believes that operation of KIHS as a broadband facility of KRSS is an economically sensible way of meeting the community's demand for high-quality, noncommercial programming while enabling CSN to best use its resources. Granting a waiver of the main studio rule in this case is fully consistent not only with the Commission's prior actions with respect to other CSN stations, but also with its treatment of other noncommercial entities comparable to CSN.