

Exhibit 13

On behalf of Educational Communications of Colorado Springs, Inc. ("ECCS"), permittee of a new FM station at Pueblo, Colorado, this will request a waiver of the Commission's main studio requirement embodied in Section 73.1125(a)(4) of its rules to enable ECCS to operate a noncommercial educational station on Channel 202 at Pueblo, Colorado as a satellite of parent Station KTLF(FM), Colorado Springs, Colorado.

The Commission has waived its main studio requirement where "good cause" exists to do so and where the proposed studio location "would be consistent with the operation of the station in the public interest." The Commission has long recognized the benefits of centralized operations for noncommercial educational stations, given their limited funding, and thus has found "good cause" existing to waive the main studio location requirement where satellite operations are proposed and where the satellite station has demonstrated that it will meet its local service obligation to satisfy the Section 73.1125 "public interest" standard. *See Amendment of Section 73.1125 and 73.1130*, 3 FCC Rcd. 5024, 5026-28 (1988); *Nebraska Educational Television Commission*, 4 RR 2d 771 (1965). *See also Public Broadcasting of Northwest Ohio*, 12 FCC Rcd. 15114, 15115-16 (1997) (paras. 2-4); *American Family Association*, 12 FCC Rcd. 15128, 15129-30 (1997).

ECCS has created and distributed noncommercial educational programming throughout a regional network of stations and translators with Station KTLF(FM) as the central distribution point.

Consistent with the above-cited cases, ECCS intends to meet its local service obligations necessary to satisfy the Section 73.1125 "public interest" standard. The Pueblo Station will operate as a satellite station of commonly-owned Station KTLF(FM), Colorado Springs, Colorado. In order to ensure that local issues in Pueblo will be met, ECCS commits to do the following:

- a. ECCS, at least quarterly, will conduct interviews with residents and community leaders to assess community needs and the need for responsive programming;
- b. ECCS will ensure that its Community Advisory Board has at least one resident of Pueblo, who will be asked to provide recommendations on community needs and programming directly to ECCS' management;
- c. ECCS will develop periodic local programming for Pueblo residents, including coverage of significant local news and cultural events;
- d. ECCS will provide for the broadcast of local public service announcements; and
- e. ECCS will maintain its public file within the community of license and

will maintain a copy of the file at the "parent" station, KTLF, will make reasonable accommodation to Pueblo area listeners willing to examine the file's contents, and will maintain a local toll free telephone number and mailing address for the benefit of Pueblo residents.

Clearly, a waiver is warranted here because of ECCS' demonstrated commitment to serving listeners in Pueblo as well as the economic benefits ensuring from a centralized operation that will support additional, high quality programming.

In view of the above, ECCS respectfully requests that the Commission waive Section 73.1125 so as to permit its Pueblo, Colorado Station to operate as a satellite station of Station KTLF(FM), but with local service commitments discussed herein.