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enclosed letters from FCC Audio Services Division Chief dated March 14, 1988 and December 23, 1987).¹

The previous waiver grants for KLNLR and KTPH permitted "unattended operation during periods when the proposed station is rebroadcasting the signal of another station." NPR reasonably understood this to mean that, during these periods of unattended operation, when no staff members were present at KLNLR and KTPH, their compliance with main studio requirements (such as staff presence) would be fulfilled by the hub station KNPR's main studio in Las Vegas. As discussed below, the unattended operation waiver requests and FCC grants also detailed the station's other justifications for use of a consolidated main studio, namely the stations' locations in spacious and sparsely populated rural areas, and NPR's difficulty with meeting staffing needs and operational costs at these satellite sites. Nonetheless, given that the FCC's audio division has standardized the process of granting and recording main studio location waivers for noncommercial educational satellite stations since the original construction permit grants for KLNLR and KTPH, and due to the subsequent relaxing of the unattended operation rules making that waiver otherwise superfluous, NPR now requests formal confirmation of the main studio waiver status for these stations.

In light of the relatively thin procedural record in this matter, NPR also provides at this time the following justification for the main studio waivers for KLNLR and KTPH. NPR is the licensee of five noncommercial educational radio stations in Nevada, including KNPR-FM, Las Vegas, KWPR(FM), Lund, KCVN(FM), Las Vegas, KTPH(FM) and KLNLR(FM). The FCC formally granted a waiver of Section 73.1125 for satellite operation of KWPR when its original construction permit was granted in 1999. Stations KLNLR and KTPH rebroadcast KNPR's news programming from 5 A.M. to 7 P.M. each day, and KCVN's classical music programming from 7 P.M. to 5 A.M. each day. Given the stations' repeater status, there would be no changes in operation resulting from confirmation of main studio waivers for KLNLR and KPTH that would be apparent to the public. Both stations will continue, without interruption or alteration, their current noncommercial educational broadcasts and local and community-based programming responsive to the needs and concerns of local listeners.

KLNLR's community of Panaca is 119 miles from Las Vegas, and KTPH in Tonopah is approximately 172 miles from Las Vegas. Given the population of Panaca (approximately 800)² and Tonopah (2,627)³ and the extremely limited financial resources that can be generated from

¹ These unattended operation waivers were obtained prior to the retention of the current communications counsel for KLNLR and KTPH by a public radio consultant assisting several rural radio stations with obtaining similar authorizations. Upon the consultant's request, the FCC removed the waivers as unnecessary by letter dated March 11, 1997 (see enclosed copy) due to changes in the FCC's rules. As of 1995, and pursuant to 47 C.F.R. Section 73.1300, stations no longer required waivers for unattended operation.

² See <http://www.lincolncountynevada.com/towns/panaca.htm>

³ See <http://www.census.gov/census2000/states/nv.html>.