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November 19, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Request for Waiver of Main Studio Rule
Radio Training Network, Inc.
WLFH(FM) at Claxton, Georgia (Facility ID No. 176341)

Dear Ms. Dortch:

Radio Training Network, Inc. ("RTN"), the permittee of WLFH(FM) at Claxton, Georgia (Facility ID No. 176341) ("WLFH"), seeks a waiver of the Commission's main studio rule, 47 C.F.R. § 73.1125. RTN proposes to operate WLFJ as a satellite of WLFS(FM), Port Wentworth, Georgia (Facility ID No. 85801) ("WLFS").

As provided in Section 73.1125(a)(4), the Commission will waive the main studio rule where good cause is shown and where the proposed studio location "would be consistent with the operation of the station in the public interest." The Commission has recognized the benefits of centralized operations for noncommercial educational stations, given their limited resources, and has granted waivers of the main studio rule. *See Main Studio and Program Origination Rules*, 3 FCC Rcd 5024 (1988); *see also American Family Association*, (Marksville, Louisiana), 12 FCC Rcd 15128 (Hearing Designation Order 1997); *Public Broadcasting in Northwest Ohio (Defiance, Ohio)*, 12 FCC Rcd 15114 (Hearing Designation Order February 19, 1997); *Greater Washington Education Telecommunications Association, Inc.*, (Leonardtown, Maryland), 12 FCC Rcd 15123 (1997).

RTN seeks a satellite waiver of the main studio rule in order to locate the main studio for WLFH at the main studio of WLFS. WLFS' main studio is located in Savannah, Georgia. Claxton and Savannah are located approximately 57 miles apart.

Grant of the satellite waiver request to locate the main studio in Savannah will allow tremendous cost savings while imposing a *de minimis* inconvenience. The cost savings are in the public interest by allowing the limited funding available for noncommercial broadcasting to be used for programming. A waiver is necessary due to the limited funding available to noncommercial educational broadcast stations. The cost savings will help ensure the station's financial success.

In order to ensure that its public service obligations to the community of Claxton are met, RTN agrees to undertake the following:

- (1) It will maintain the public file for WLFH at WLFS' main studio, and make documents in the public file available to the public pursuant to 47 C.F.R. Section 73.3527(c)(2).

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--VIA HAND DELIVERY --

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ACCEPTED/FILED**

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**Federal Communications Commission
Office of the Secretary**

- (2) It will establish toll-free phone service to the station for residents of Claxton.
- (3) It will provide periodic local programming for Claxton, residents, including coverage of significant local news or cultural events.
- (4) It will, on at least a quarterly basis, ascertain the interests, needs, and concerns of Claxton residents. RTN will provide programming that addresses these community needs.

Respectfully submitted,

RADIO TRAINING NETWORK, INC.

By: A. Wray Fitch III
A. Wray Fitch III
Its Counsel

cc: Penelope Dade (via email – penelope.dade@fcc.gov)
James L. Campbell (For Public File)