

**REQUEST FOR WAIVER OF THE MAIN STUDIO LOCATION REQUIREMENTS AT
SECTION 73.1125(a) OF THE COMMISSION'S RULES**

UCB USA, Inc. ("UCB") respectfully requests waiver of the Section 73.1125(a) of the Commission's rules ("main studio rule"), to enable UCB to operate the Coos Bay station primarily as a satellite of UCB's licensed NCE FM station KDOV-FM, Medford, Oregon (Fac. ID 17460). The main studio would be co-located at the KDOV main studio in Medford, Oregon. In support hereof, the following is respectfully shown:

The Commission's standard for granting NCE main studio waiver requests is set forth in *Main Studio and Program Origination Rules*, 3 FCC Rcd 5024, 5027 at para. 30 (1988). There, the Commission states:

[W]e have recognized the benefits of centralized operations for noncommercial educational stations, given the limited funding available to these stations, and we have granted waivers to ... radio networks to operate "satellite" stations that do not necessarily meet the requirements of a main studio. These stations, however, have not been permitted to ignore local service obligations, and waivers generally have been granted only upon a showing that the local community would be served.

In applying the foregoing standard to the instant proposal, it is respectfully noted that UCB is a Section 501(c)(3) non-profit corporation and depends upon listener donations for funding. UCB intends to operate the Coos Bay station as a satellite of KDOV, in order to expand the reach of UCB's high-quality noncommercial educational radio programming.

UCB will fulfill its obligations to serve the local Coos Bay community via: a full-time public affairs liaison traveling regularly between the license communities of UCB's stations to identify local community interests will also travel to Coos Bay; the local community interests of Coos Bay identified by the public affairs liaison will be treated not only within existing news and

public affairs programming broadcast by KDOV, but also, as needs arise, in special programming specifically directed to the Coos Bay area; regularly-scheduled live call-in programming will solicit comments from listeners in the Coos Bay area (and on the KDOV website, www.thedove.us); a local public file will be maintained in Coos Bay as well as the KDOV main studio.

UCB maintains a toll-free telephone number, in accordance with Section 73.1125(e) of the rules, and the toll-free number is regularly announced on-air as well as displayed prominently on the www.thedove.us website, for the convenience of listeners who might otherwise incur toll charges calling the main studio.

Based on the foregoing, it is respectfully submitted that UCB has demonstrated good cause to co-locate the main studios for the proposed new NCE FM stations, including the subject station, at the KDOV studio, and that doing so would be consistent with the operation of the station in the public interest. Accordingly, UCB respectfully requests that the instant waiver of the main studio location rule be granted.