

MAIN STUDIO RULE WAIVER REQUEST

WPRR, Inc., the proposed assignee of Station WJPC, Pontiac, Illinois, hereby requests a waiver of Section 73.1125 of the Rules to permit the main studio of Station WJPC to be located at 3777 44th Street, Kentwood, Michigan 49512. In support of this request, the following is submitted.

WPRR, Inc. is a not-for-profit corporation organized under the laws of the State of Michigan, and has been certified as a Section 501(c)(3) tax exempt organization by the Internal Revenue Service.

Since August, 2008, WPRR, Inc. has been the programmer of Station WPRR, Ada, Michigan which is a commercial AM station operating on 1680 kHz, one of the earliest of the expanded band stations. The licensee of Station WPRR is preparing and will be filing an application to change status to a noncommercial educational (NCE) station. As noted, WPRR, Inc. has been programming, and is programming, Station WPRR since August, 2008 on a noncommercial educational basis from the Kentwood studio. The licensee of Station WPRR is also the licensee of FM Translator Station W237CZ, Grand Rapids, Michigan, which rebroadcasts the signal of WPRR.

With the acquisition of Station WJPC, WPRR, Inc. is a nascent NCE radio network, presently consisting of Stations WPRR, W237CZ and, soon, WJPC, with the intention of adding more stations to the network as soon as possible.

The Commission has long recognized the benefits of centralized operations for NCE radio networks because of their limited funding options and the expense of establishing and staffing studios for each station in the network, particularly in communities with small populations. Indeed, Station WJPC, the station being assigned by this application, presently operates pursuant to a waiver of the main studio rule. The population of Pontiac, Illinois, one of the factors considered in the waiver of the main studio rule for WJPC, has only increased by 67 persons, to 11,931, between the 2000 census and the 2010 census.

WPRR, Inc. will comply with all of the technical rules and regulations, including EAS requirements, as they apply to satellite stations. WPRR, Inc. will regularly contact community leaders in Pontiac and the surrounding area to ascertain issues of public concern. Programs to address those issues will be broadcast on WJPC. A toll-free telephone number will be available in Pontiac and published in the local telephone directory. A public inspection file, including issues/programs lists, will be maintained in the Pontiac community.

While many NCE radio networks broadcast primarily religious programming, which has long been recognized as legitimate educational programming, WPRR broadcasts secular news and other programs designed to stimulate thought and discussion

of current events, trends, customs and mores, including the effects of history on such matters.

Donations to WPRR, Inc. have been, and will undoubtedly continue to be, small relative to other NCE radio networks. Requiring a standard main studio at each station, particularly in a network which is just beginning, will prevent the growth of the network, and possibly cause of demise of the existing one.