



Davis Wright Tremaine LLP 2007 JAN 11 P 12:02

ANCHORAGE BELLEVUE LOS ANGELES NEW YORK PORTLAND SAN FRANCISCO SEATTLE SHANGHAI WASHINGTON, D.C.

KAREN A. ROSS  
DIRECT (202) 508-6669  
karenross@dwt.comSUITE 450  
1500 K STREET NW  
WASHINGTON, D.C. 20005-1272TEL (202) 508-6600  
FAX (202) 508-6699  
www.dwt.com

January 10, 2007

**VIA HAND DELIVERY**Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street  
Room TW-A325  
Washington, DC 20554

FILED/ACCEPTED

JAN 10 2007

Federal Communications Commission  
Office of the Secretary**Re: Supplement to Main Studio Relocation and Request for Main Studio  
Waiver  
WTRK(FM), Freeland, Michigan (FIN: 89044)**

Dear Ms. Dortch:

On behalf of Educational Media Foundation ("EMF"), the licensee of FM radio station WTRK, Freeland, Michigan, this is a supplement to the request filed on September 12, 2006 for a waiver of Section 73.1125 of the Commission's rules to permit the relocation of the main studio of WTRK from its current location in Santa Rosa, California to the main studio of EMF's co-owned station KLRD(NCE-FM), Yucaipa, California. See FCC File No. -20060912AEY. A receipt stamped copy of the request is attached hereto. This supplement is being submitted to correct and clarify the station details in the aforementioned request.

In its main studio relocation and waiver request, EMF inadvertently listed the facility identification number ("FIN") as "89041." The correct FIN for the Freeland station is "89044." Additionally, since filing the request, the call sign of the station was changed from "WLKB" to "WTRK." Therefore, all references to FM station WLKB, Freeland, Michigan should now be processed as WTRK, Freeland, Michigan and EMF hereby respectfully renews its request.

January 10, 2007  
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Should there be any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Karen A. Ross', written in a cursive style.

Karen A. Ross

Enclosure

cc: Dale Bickel - FCC



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karenross@dwt.com

SUITE 450  
1500 K STREET NW  
WASHINGTON, D.C. 20005-1272

TEL (202) 508-6600  
FAX (202) 508-6699  
www.dwt.com

September 12, 2006

### VIA HAND DELIVERY

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth St., S.W., TW-A325  
Washington, DC 20554

RECEIVED

SEP 12 2006

Federal Communications Commission  
Office of Secretary

**Re: Main Studio Relocation and Request for Main Studio Waiver  
WLKB(FM), Freeland, Michigan (FIN: 89041)**

Dear Ms. Dortch:

On behalf of Educational Media Foundation ("EMF"), the licensee of noncommercial, educational FM station WLKB(FM), Freeland, Michigan, we hereby respectfully request a waiver of Section 73.1125 of the Commission's rules (hereinafter referred to as the "main studio rule") to permit the location of the main studio of WLKB at the main studio of EMF's co-owned station KLRD(NCE-FM), Yucaipa, California. The proposed studio location is approximately 3,053 kilometers (1,897 miles) outside of the 3.16 mV/m contour of WLKB.

On June 8, 2005, Commission staff granted EMF's initial waiver request<sup>1</sup>, authorizing EMF to operate WLKB as a satellite of EMF's co-owned noncommercial, educational FM station KLVR(FM), Santa Rosa, California. EMF now proposes to operate WLKB, as a "satellite" station of its co-owned station KLRD in Yucaipa, California.

As a satellite of KLRD, WLKB will now become part of a network of radio stations operated by EMF known as the "Air-1 Radio Network," and the station will broadcast the Air-1 Radio programming. EMF is a non-profit corporation and each network station operates noncommercially and broadcasts the noncommercial educational programming carried on the Air-1 Radio Network. By co-locating WLKB's main studio at KLRD's main studio in Yucaipa,

<sup>1</sup> See File No. -20050413ACO.



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EMF will realize valuable economies of scale and cost savings, which are needed to maintain the high quality of Air-1's noncommercial educational programming. As a listener-supported station, WLKB will face severe financial constraints. The obligation to maintain separate staffing and studio locations for both WLKB and KLRD will place a serious financial burden on EMF and divert what limited resources are available from Air-1's programming efforts.

To ensure that WLKB fulfills its local service obligations to the residents of Freeland, Michigan, EMF will maintain an auxiliary studio either: 1) in Freeland; 2) at a location within the principal community contour of an AM, FM, or TV station licensed to Freeland; or 3) within twenty-five miles from the reference coordinates of the center of Freeland. As EMF represented in its initial request, this auxiliary studio will be capable of originating local programming that is responsive to local community needs.

In addition to maintaining an auxiliary studio, EMF will also have a local public affairs representative, who may be a volunteer, available in the community of Freeland, Michigan. This local representative will, at least on a quarterly basis, conduct interviews and surveys of local community leaders and other residents to ascertain the interests, concerns, and needs of the Freeland listeners. EMF will then address the recurrent issues, problems, and needs of the residents of Freeland in Air-1's news and public affairs programming.

EMF's local representative will further serve as a liaison between the residents of Freeland and EMF's programming personnel. EMF will maintain a toll-free telephone number, as required by Section 73.1125(d) of the rules. Finally, EMF will maintain its public inspection file for WLKB at the main studio of its parent station, KLRD(FM), Yucaipa, California, as required by Section 73.3527 of the Commission's rules, and make reasonable accommodation to listeners wishing to examine the file's contents.

Under Section 73.1125 of the Commission's rules, a broadcast station must maintain its main studio (a) within the station's community of license; (b) at a location within the principal community contour of any AM, FM, or TV broadcast station licensed to the station's community of license; or (c) within 25 miles from the reference coordinates of the center of the station's community of license, except when "good cause" exists for locating the main studio at an alternate location. The Commission traditionally considers waiver requests by noncommercial educational stations on a case-by-case basis. See Main Studio and Program Origination Rules, 3 FCC Rcd 5024 (1988); see also Review of the Commission's Rules Regarding the Main Studio and Local Public Inspection Files of Broadcast Television and Radio Stations, 13 FCC Rcd 15691, 15695 n.18 (1998). In the context of noncommercial waiver requests, the Commission has expressly and implicitly found "good cause" to exist in numerous instances based solely upon a showing that centralized operations will provide an economic benefit to noncommercial stations which have limited funding, provided that local service obligations are met. See Letter to Roy R. Russo, Esq., dated January 24, 1994; Letter to Richard J. Bodorff, dated January 2, 1992; The President and Board of Trustees of the Miami University, 7 FCC Rcd 2902 (1992); The Cedarville College, 6 FCC Rcd 538 (1991); Letter to Gerald Stevens-Kittner, Esq., dated



July 15, 1991; Sound of Life, Inc., 4 FCC Rcd 8273 (1989); Lift Him Up Outreach Ministries, Inc., 3 FCC Rcd 5571 (1988); Georgia State Board of Education, 70 F.C.C.2d 948 (1979), recon. denied, 71 F.C.C.2d 227 (1979); Nebraska Educational Television Comm'n, 4 R.R.2d 771 (1965).

EMF respectfully submits that the instant request presents substantially the same showing of good cause and public interest benefits as each of these waivers noted above. In each case, the Commission staff determined that the waivers were justified on the basis of the limited funding available to the stations and the increased efficiencies resulting from co-location of studios. Like these other waiver applicants, EMF will also experience financial difficulties in maintaining separate staffing and separate facilities for its "parent" and "satellite" stations. EMF will also be fully capable of fulfilling its local service obligations in the same manner as each of these other applicants.

In view of the foregoing, EMF requests that the Commission find pursuant to Section 73.1125(b)(2) of the Commission's rules that the public interest will be served by the consolidation of WLKB's main studio with KLRD's main studio, and authorize EMF to locate WLKB's main studio outside of the city grade community and contour of the station and more than 25 miles from the reference coordinates of the center of Freeland. As EMF is a noncommercial entity there is no fee associated with this filing.

If there should be any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Karen A. Ross', written in a cursive style.

Karen A. Ross