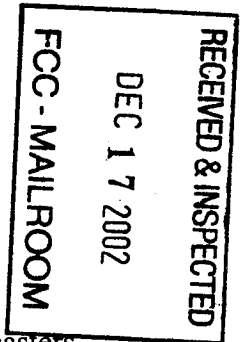


**FEDERAL COMMUNICATIONS COMMISSION**  
**WASHINGTON, D. C. 20554**  
**December 12, 2002**

**IN REPLY REFER TO:**  
**1800B3-VFA**

Western Inspirational Broadcasters, Inc.  
Robert T. Hesse, General Manager  
6363 Highway 50  
Carson City, NV 89701

**In re: KCSP(FM), Casper, WY**  
Facility ID No. 71810  
Western Inspirational Broadcasters,  
Inc.



Request for Waiver of § 73.1125  
(Main Studio Rule)

Dear Mr. Hesse:

This staff has under consideration the request of Western Inspirational Broadcasters, Inc. ("WIBI") for a waiver of the Commission's main studio requirement, 47 C.F.R. Section 73.1125, in order to operate KCSP(FM), Casper, Wyoming as a satellite of its commonly owned noncommercial educational ("NCE") station KNIS(FM), Carson City, Nevada.<sup>1</sup>

Pursuant to Section 73.1125(a), a main studio must be located either (1) within a station's principal community of license contour, (2) within the contour of any other broadcast station licensed to its community, or (3) within 25 miles of the center of its community of license.<sup>2</sup> However, under Section 73.1125(b)(2), the Commission will waive these requirements where good cause exists to do so and where the proposed studio location would be consistent with operation of the station in the public interest. Each waiver request by an NCE station seeking to operate as the satellite of another NCE station is considered on a case-by-case basis. The Commission has recognized the benefits of centralized operations for NCE stations, given their limited funding, and thus found "good cause" exists to waive the main studio location requirement where satellite

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<sup>1</sup> A "satellite" station meets all of the Commission's technical rules. However, it originates no programming and instead rebroadcasts the parent station's programming. *See Amendment of Multiple Ownership Rules Memorandum Opinion and Order*, 3 RR2d 1554, 1562 (1964).

<sup>2</sup> *See 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 (1998); *recon. Granted in part*, 14 FCC Rcd 11113 (1999) ("Reconsideration Order").

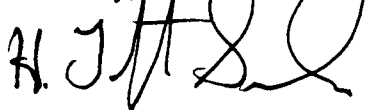
operations are proposed.<sup>3</sup> A satellite station must, however, demonstrate that it will meet its local service obligation to satisfy the Section 73.1125 "public interest" standard.<sup>4</sup> WIBI states that as a noncommercial educational licensee, it has encountered difficulty in providing financial support for the main studios required by the Commission. Therefore, WIBI now seeks a waiver of C.F.R. Section 73.1125 in order to arrange its stations into a regional originating and satellite structure. WIBI's request is based on the economies of scale that would be realized by grant of its waiver.

WIBI proposes to operate KCSP(FM), Casper, Wyoming as a satellite of station of KNIS(FM), Carson City, Nevada, approximately 748 miles from Casper. Where there is a great distance between parent and satellite stations, as here, we are particularly concerned that the licensee takes adequate measures to maintain its awareness of and address the satellite community's needs and interests. To that end, WIBI has pledged to engage in a quarterly ascertainment of the community needs and interests of Casper by: (1) adding to its Community Advisory Board at least one resident of Casper who will be asked to provide recommendations on community needs and programming directly to the management of WIBI; (2) providing periodic local programming for Casper, including coverage of significant local news or cultural events; (3) maintaining a duplicate public inspection file for KSCP(FM) in Casper; and (4) maintaining a toll-free telephone number between Casper, Wyoming and the KNIS(FM) main studio.

Under these circumstances, we are persuaded that WIBI will meet its local service obligation and thus, that grant of the requested waiver is consistent with the public interest. We remind WIBI, however, of the requirement that it maintain a public file for KSCP(FM) at the main studio of the "parent" station KNIS(FM). It must also make reasonable accommodation for listeners wishing to examine the file's contents.<sup>5</sup> We further remind WIBI that, notwithstanding the grant of waiver requested here, the public file for KSCP(FM) must contain the quarterly issues and programs list, as required by 47 C.F.R. Section 73.3527(e)(8).

Accordingly, the request for waiver of 47 C.F.R. Section 73.1125 filed by Educational Communications of Colorado Springs, Inc. IS HEREBY GRANTED.

Sincerely,



H. Taft Snowdon  
Supervisory Attorney  
Audio Division  
Media Bureau

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<sup>3</sup> *Id.*

<sup>4</sup> *Id.*