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DIVISION

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In re: WRNI(AM), Providence, RI  
WRNI Foundation  
File No. BML-980428KA

Dear Counsel:

The staff has under consideration the above-referenced application of WRNI Foundation ("Foundation") to modify the license of WRNI(AM), Providence, Rhode Island to specify operation as a noncommercial educational ("NCE") AM broadcasting station. Foundation has requested a waiver of the Commission's main studio requirement, see 47 C.F.R. § 73.1125, in order to operate WRNI(AM) as a satellite of NCE station WBUR(FM), Boston, Massachusetts.<sup>1</sup> For the reasons set forth below, we will waive 47 C.F.R § 73.1125 and grant Foundation's application.

Section 73.1125(a) requires each broadcast station to maintain a main studio within the station's principal community contour to ensure that the station will serve the needs and interests of the residents of its community of license. Amendment of Sections 73.1125 and 73.1130, 3 FCC Rcd 5024, 5027 (1988). However, under Section 73.1125(a)(4), the Commission will waive this requirement where "good cause" exists to do so and where the proposed studio location "would be consistent with the 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 operations are proposed. Id. A satellite station must, however, demonstrate that it will meet its local service obligation to satisfy the Section 73.1125 "public interest" standard. Id.

Foundation's request is based on the economies of scale which would be realized by

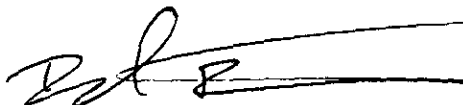
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<sup>1</sup> A "satellite" station meets all of the Commission's technical rules; however, it originates no programming and instead rebroadcasts the parent station's programming. See Amendment of Multiple Ownership Rules, Memorandum Opinion and Order,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

grant of its waiver. We agree and conclude that there is "good cause" to waive 47 C.F.R. § 73.1125(a)(4) in these circumstances. Foundation proposes to operate WRNI(AM) as a satellite of WBUR(FM), Boston, Massachusetts, approximately 30 miles from Providence. The Commission expects the licensee of a satellite station to take adequate measures to maintain its awareness of the satellite community's needs and interests. To that end, Foundation has pledged to: (1) intensify its efforts to service the WRNI(AM) listening area with a program of assessing local needs and monitoring local issues; (2) collaborate with the Foundation for Ocean State Public Radio ("FOSPR") on programming especially designed to serve the WRNI(AM) service area; (3) deem FOSPR's officers as *ex officio* members of the WBUR(FM) advisory board and utilize them as a resource for WBUR(FM) in providing guidance for effective broadcast service of Providence; (4) intensify its news department's work in the WRNI(AM) service area, providing in-depth coverage of issue local to the WRNI(AM) service area; (5) employ a resident of Rhode Island as a member of the WBUR(FM) news staff on a 3/4 time basis to assess and report on issues in the WRNI(AM) service area; (6) subscribe to newspapers which serve the particular needs of the WRNI(AM) service area, including the *Providence Journal-Bulletin* and the *Providence Business News*; (7) maintain a toll-free telephone number between Providence and the WRNI(AM) main studio in Boston, Massachusetts; and (8) maintain the WRNI(AM) public inspection file in Providence, Rhode Island. In these circumstances, we are persuaded that Foundation will meet its local service obligations and thus grant of the requested waiver is consistent with the public interest.

Accordingly, the application of WRNI Foundation to modify the license of WRNI(AM) to specify noncommercial, educational operation (File No. BML-980428KA) and the request for waiver of 47 C.F.R. § 73.1125 ARE HEREBY GRANTED.

Sincerely,



*lws* Linda Blair, Chief  
Audio Services Division  
Mass Media Bureau