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FCC MAIL SECTION  
**FEDERAL COMMUNICATIONS COMMISSION**

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WASHINGTON, D. C. 20554  
MAR 12 1998

DISPATCH

IN REPLY REFER TO:  
1800B3-ALM

Robin L. Miller, Esq.  
Arter & Hadden  
1801 K Street, Suite 400K  
Washington, D. C. 20006-1301

In re: Northern Arizona University  
KPUB(FM), Prescott, Arizona  
KNAA(FM), Show Low, Arizona  
KNAD(FM), Page, Arizona

Dear Ms. Miller:

The staff has under consideration the December 11, 1997 request of Northern Arizona University ("NAU") to operate the above-referenced authorized facilities as satellite stations of commonly owned noncommercial, educational ("NCE") FM radio station KNAU(FM), Flagstaff, Arizona.<sup>1</sup> For the reasons set forth below, we will grant NAU's request and waive 47 C.F.R. § 73.1125 for these facilities.

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.

NAU's request is based on the economies of scale which would be realized by 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. NAU proposes to operate the Prescott, Show Low,

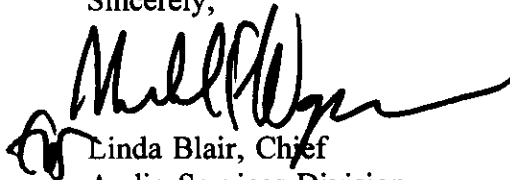
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<sup>1</sup>A "satellite" station meets all of the Commission's technical rules, however, it originates no programming and instead rebroadcasts the parent station's programming. See Amendment of Multiple Ownership Rules, Memorandum Opinion and Order,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

and Page, Arizona stations as a satellites of KNAU(FM), Flagstaff, Arizona which is approximately miles sixty miles from Prescott, ninety miles from Show Low, and one hundred miles from Page. Where there is a great distance between parent and satellite stations, as here, we are particularly concerned that the licensee take adequate measures to maintain its awareness of the satellite community's needs and interests. To that end, NAU has pledged to: (1) conduct a formal ascertainment of needs and interests in each community; (2) subscribe to local newspapers published in each community; (3) assign news reporters to cover stories and events of importance of each community; (4) maintain a toll free telephone number between each community and the KNAU(FM) main studio; and (5) establish a public inspection file in each station's community. Additionally, NAU states that each station will have the ability to originate local programming. In these circumstances, we are persuaded that NAU will meet its local service obligations and thus, that grant of the requested waivers are consistent with the public interest.

Accordingly, the request for waivers 47 C.F.R. § 73.1125 filed by Northern Arizona University to operate KPUB(FM), Prescott, Arizona, KNAA(FM), Show Low, Arizona, and KNAD(FM), Page Arizona as satellite stations of KNAU(FM), Flagstaff, Arizona ARE HEREBY GRANTED.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Blair", with a stylized flourish at the end.

Linda Blair, Chief  
Audio Services Division  
Mass Media Bureau