

**FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D. C. 20554**

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

Ms. Jill Paydon  
General Manager, KHSU(FM)  
Humboldt State University  
Arcata, California 95521

Re: New Educational FM station in Crescent City, California, File No. BPED-960328IB

Dear Ms. Paydon:

The staff has under consideration the application of Humboldt State University ("University") to construct a new noncommercial, educational FM station in Crescent City, California (File No. BPED-960328IB). University requests waiver of the Commission's main studio requirement, see 47 C.F.R. § 73.1125, in order to operate the proposed Crescent City facility as a satellite of commonly owned NCE station KHSU(FM), Arcata California.<sup>1</sup> For the reasons set forth below, we will waive 47 C.F.R § 73.1125 and grant University's application for a construction permit.

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.

University'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. University proposes to operate the proposed Crescent City, California station as a satellite of KHSU(FM), Arcata, California, approximately 80 miles from Arcata. Where there is a great distance between parent and satellite stations, as

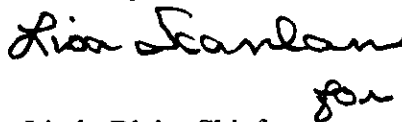
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<sup>1</sup>A "satellite" station meets all of the Commission's technical rules; however, it originates no programming and instead rebroadcasts the parent station's programming. See Amendment of Multiple Ownership Rules, Memorandum Opinion and Order,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

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, University has pledged to: (1) establish an auxiliary studio in Crescent City; (2) maintain an on-going dialogue with several Crescent City area based agencies and arts/cultural organizations; (3) utilize the KHSU news staff to communicate regularly with the Del Norte County Board of Supervisors and other elected officials serving Crescent City; (4) augment the KHSU news staff with contract personnel in Del Norte County when the proposed station begins operation; (5) place two individuals living and working in the Crescent City/Del Norte County area on the KHSU Community Advisory Group; (6) have programming decision makers, (i.e.) the Director of Programming and News staff, consult with CAG members from each geographic constituency on specific issues and needs facing their respective communities; (7) maintain a toll-free telephone number between Crescent City and the KHSU(FM) main studio in Arcata; and (8) locate the proposed station's public inspection file in Crescent City. In these circumstances, we are persuaded that University will meet its local service obligations and thus, that grant of the requested waiver is consistent with the public interest.

Accordingly, the application of Humboldt State University for a new educational FM station in Crescent City, California (File No. BPED-960328IB) and the request for waiver of 47 C.F.R. § 73.1125 ARE HEREBY GRANTED. The authorization will be forwarded under separate cover.

Sincerely,

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

Linda Blair, Chief  
Audio Services Division  
Mass Media Bureau