

Gray Miller Persh LLP

Attorneys at Law
1200 New Hampshire Ave., NW, # 410
Washington, DC 20036

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Barry S. Persh

(202) 776-2458

bpersh@graymillerpersh.com

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Federal Communications Commission
Office of the Secretary

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445-12th Street, S.W.
Washington, DC 20554
Attention: Media Bureau, Audio Division

Note: Exempt from filing fees

Re: Notification/Update Regarding Main Studio Waiver
Idaho State Board of Education (Boise State University)
NCE Station KBSK(FM), McCall, ID (Facility ID 91742)

Dear Ms. Dortch:

On behalf of Idaho State Board of Education (Boise State University) ("BSU" or "Boise State Public Radio"), licensee of noncommercial educational ("NCE") radio station KBSK(FM), McCall, Idaho, we hereby notify the Commission of a change in KBSK's parent/hub station in connection with its granted main studio waiver and satellite status. As explained below, there has been no change in the KBSK main studio location or satellite operation as a part of BSU's statewide noncommercial radio network. The only change to report by this notice concerns the co-owned parent/hub station of record, which the FCC records should now reflect as: KBSU-FM, Boise, Idaho, FCC Facility ID No. 6325.

With the grant of the original construction permit and license for KBSK in FCC File Nos. BPED-19980928MA and BLED-20020709ABD, the Commission granted a waiver of the main studio location requirements of Section 73.1125 of the FCC's Rules to allow KBSK to operate as a satellite of co-owned noncommercial educational station KBSU(AM), Boise, Idaho, from Boise State Public Radio's consolidated main studio location in Boise. As noted above, there is no change in Boise State Public Radio's operation of KBSK as a satellite station from its consolidated Boise main studio location; due to the assignment of KBSU(AM) to another entity, however, BSU now operates KBSK as a satellite of a different co-owned noncommercial educational station, namely KBSU-FM.

BSU is the licensee of nine (9) noncommercial educational radio stations in Idaho, including KBSK in McCall, and two (2) stations in Boise: KBSU-FM and KBSX(FM). BSU was previously the licensee of a third noncommercial radio station in Boise, KBSU(AM). BSU maintains one centralized, consolidated main studio location in Boise, and each of the seven (7) stations outside of Boise operate as satellite facilities pursuant to main studio waiver grants. KBSK was originally licensed in 2002 with a main studio waiver grant specifying operation as a

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satellite of KBSU(AM) from the Boise main studio. Given its assignment of KBSU(AM), BSU seeks to clarify the record for KBSK(FM)'s ongoing satellite operation from the consolidated Boise main studio, now as a satellite of KBSU-FM.

Despite this change in hub station, BSU reaffirms the justifications underlying KBSK's existing main studio waiver grant. It remains the case that a stand-alone operation in McCall could not offer the quality and quantity of program offerings that BSU brings to its community as a satellite station that can take advantage of the economies of scale allowed by utilization of the consolidated Boise main studio. Moreover, BSU will continue to operate KBSK as part of its statewide noncommercial educational radio network, to ascertain community needs and issues of concern in McCall, and to address such interests through KBSK's programming.

Accordingly, KBSK's satellite operation will continue to promote the public interest by allowing BSU to serve the needs of the McCall community by taking advantage of all of the programming resources of its statewide noncommercial radio network and existing network headquarters/centralized studio facilities in Boise. As a result, it remains the case that this mode of operation will allow BSU to provide the highest quality of public radio offerings to the McCall community consistent with the realities of funding for public broadcasting. The Commission has stated that "[w]e have recognized the benefits of centralized operations for noncommercial educational stations, given the limited funding available to these stations, and we have granted waivers to state and regional public television and radio networks to operate 'satellite' stations that do not necessarily meet the requirements of a main studio." *In re Main Studio and Program Origination Rules for Radio and Television and Television Broadcast Stations*, Memorandum Opinion and Order, 3 FCC Rcd 5024 (1988).

BSU is a noncommercial educational broadcaster and KBSK is operated on a noncommercial educational basis. Moreover, BSU qualifies as a governmental entity. Therefore, BSU is exempt from FCC filing and regulatory fee requirements pursuant to Section 1.1116 of the FCC's rules. The applicant also certifies that no party to the application is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862. Should any questions arise concerning this matter, kindly contact this office.

Very truly yours,



Barry S. Persh
Counsel for BSU