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Ms. Rebecca Dortch,  
Office of the Secretary,  
Federal Communications Commission,  
445 Twelfth Street, S.W.  
Room TW-A325,  
Washington, D.C. 20054

Re: Request For Main Studio Waiver  
WMFT(FM), Tuscaloosa, AL  
ID #83088

The Moody Bible Institute of Chicago (hereafter "Moody"), by its undersigned counsel, hereby respectfully requests a waiver of the requirements of Section 73.1125<sup>1</sup> of the Commission's Rules and Regulations to allow noncommercial, educational FM station WMFT, Tuscaloosa, Alabama, (ID # 83088) to operate with the main studio located at the main studio of co-owned noncommercial, educational FM station WFCM-FM, Murfreesboro, Tennessee, (ID #66111). In support of this request, the following is respectfully submitted for the consideration of the Commission.

Moody is a non-profit corporation that has been found to be qualified to operate reserved band, noncommercial stations. It is the licensee of WMFT, WFCM-FM, and a number of other noncommercial broadcast stations.

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<sup>1</sup> 47 CFR 73.1125.

The Commission has granted main studio waivers for numerous other noncommercial stations in small communities to allow their main studios to be located at the studio of a co-owned, noncommercial station, including stations located at a great distance from the “parent station.” See, *KTLZ(FM), Cuero, Texas, with a main studio waiver for operation at WLOG(FM), Markleysburg, Pennsylvania* (FCC File 20050708ACI). In this case, the stations operate approximately 190 miles apart.

Moody’s request is based on the economies of scale that would be realized by a grant of the main studio waiver. The Commission has often found “good cause” to exist for granting a main studio waiver in instances based upon the economic benefits to noncommercial stations that are provided by such centralized operations from a single studio. See, *The President and Board of Trustees Miami University*, 7 FCC Rcd 2902 (1992); *Sound of Life, Inc.*, 4 FCC Rcd 8373 (1989); and *Lift Him Up Outreach Ministries, Inc.* 3 FCC Rcd 5571 (1988).

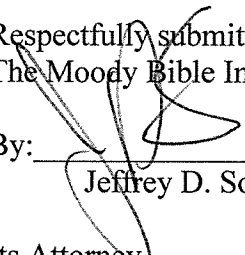
The Commission has been concerned in connection with other main studio waivers that a licensee takes adequate measures to maintain its awareness of the satellite station’s community’s needs and interests. To that end, Moody pledges to: (1) routinely contact Tuscaloosa area community leaders on a quarterly basis to ascertain the needs and interests of Tuscaloosa and provide programming specifically addressing those needs and interests; (2) maintain an Internet site whereby Tuscaloosa residents can communicate directly with the licensee concerning programming and station operation; (3) maintain a toll-free telephone line between Tuscaloosa and WFCM-FM by which residents can contact Moody management; (4) closely monitor local events in Tuscaloosa through local news outlets; (5) broadcast local public service announcements of local

interest to the community of Tuscaloosa; and (6) maintain a duplicate public inspection file in Tuscaloosa.<sup>2</sup>

In these circumstances, the Commission has been persuaded in the past that a licensee will meet its local service obligations, and thus has granted similar requests for a main studio waiver as consistent with the public interest. See *KMAS-TV, Steamboat Springs, Colorado, ID No. 20373*, 22 FCC Rcd 2183 (February 02, 2007), *Delmarva Broadcasting Corporation MO&O*, FCC 04-90, released April 14, 2004; and *Living Faith Ministries, Inc.* 21 FCC Rcd 5046. (2007).

Wherefore, based on the foregoing, Moody hereby respectfully requests a waiver of the requirements of Section 73.1125 of the Commission's Rules and Regulations to allow noncommercial, educational FM station WMFT, Tuscaloosa, Alabama, (ID # 83088) to operate with the main studio for WMFT located at the main studio of co-owned noncommercial, educational station WFCM-FM, Murfreesboro, Tennessee (ID #66111)

Respectfully submitted,  
The Moody Bible Institute of Chicago

By:  \_\_\_\_\_  
Jeffrey D. Southmayd

Its Attorney

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<sup>2</sup> Moody is aware of the requirement that it maintain a public file for WMFT at the main studio of parent station WFCM-FM. Moody will put the public file on the internet and also make other reasonable accommodations for listeners wishing to examine the file's contents. See *Main Studio Reconsideration Order*, 14 FCC Rcd at 11129 (1999). Moody is also aware that, notwithstanding grant of the waiver requested here, the public file for WMFT must contain the quarterly issues and programs list required by 47 C.F.R. § 73.3527(e)(8), as applicable.