

The Law Office of
Dan J. Alpert
2120 N. 21st Rd.
Arlington, VA 22201
DJA@COMMLAW.TV

(703) 243-8690

(703) 539-5418 (FAX)

February 13, 2017

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

Re: Station KTSN(FM)
Facility No. 174329
Blowout, TX

KCTI-FM
Facility No. 91220
Gonzales, TX

Dear Ms. Dortch:

Sun Radio Foundation ("Sun Radio"), licensee of the above-referenced station, by its attorney, submits this request for Main Studio Waiver with respect to the above-referenced stations. With respect thereto, the following is stated:

Section 73.1125(a) requires that each broadcast station operate a main studio within either the principal community contour of any AM, FM, or TV station licensed to its community or within 25 miles of the reference coordinates of the center of its community of license. Requests for a waiver of this rule by a non-commercial educational station are considered on a case-by-case basis upon presentation of a showing demonstrating that the proposed studio location would be consistent with the operation of the station in the public interest. Traditionally, the Commission has recognized the benefits of centralized operation for non-commercial stations, due to their limited funding, and has granted waivers to state and regional public radio networks to operate stations that cannot necessarily meet the requirements of a main studio.

Sun Radio hereby requests a waiver of the main studio rule with respect to this station, and an amendment of its license accordingly. Sun Radio's stations comprise a regional Texas NCE network, headquartered in Bee Cave, Texas. Its stations throughout the region are operated on a satellite basis, and have served the needs of the residents of the state of Texas. Programming for the two Stations originates from the headquarters of Sun Radio located in Bee Cave, Texas, located at 12600 Hill Country Blvd., Suite R130, Bee Cave, Texas 78738. Sun Radio will realize significant cost savings from this centralized operation, which will enhance the

ability for it to have at its disposal the resources to provide quality public radio programming to its state-wide listeners. Offices will be maintained in each community. Nevertheless, the cost savings for each Station will be as follows:

EXPENSES	AMOUNT
Telephone Service	\$120.00
Operator and Office Personal	\$2000.00
TOTAL	\$2,120.00

Sun Radio will establish a toll-free number that will permit residents of the station's service areas in general, and the communities of license in particular, to contact the Sun Radio headquarters without long-distance charges. Sun Radio also will maintain copies of the local public inspection files of the stations at convenient locations in the communities of license of the Stations where their contents will be accessible during regular business hours. Sun Radio also regularly will send representatives to the communities of license to meet with citizens and community leaders on a quarterly basis to ascertain the needs and interests of the communities and the surrounding areas.

Based upon the forgoing, it is respectfully requested that this waiver request be granted.

Very truly yours,

Dan J. Alpert

Counsel for Sun Radio Foundation