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February 21, 2017

Via Hand Delivery

Accepted / Filed

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Washington, DC 20554

FEB 21 2017

Federal Communications Commission  
Office of the Secretary

Attn: Audio Division, Media Bureau

Re: *Radio Station KRRB(FM) (formerly KARJ(FM)), Kuna, Idaho  
(FCC ID #88927),  
Main Studio Notification  
Request for Waiver of Main Studio Rule*

Dear Ms. Dortch:

Pensacola Christian College, Inc. ("PCC"), by its attorneys and pursuant to Section 73.1125 of the Commission's Rules, hereby notifies the Commission of the current main studio location of the above-referenced non-commercial radio station. PCC further respectfully requests that the Commission grant a main studio waiver, similar to that granted to PCC for Station KPCS(FM), Princeton, MN (FIN: 93446)<sup>1</sup>, in order to permit PCC to operate KRRB as part of its non-commercial educational network.

PCC recently acquired Station KRRB (then, KARJ) from Educational Media Foundation ("EMF"). In order to commence providing its services as expeditiously as possible, PCC has obtained main studio space, as follows:

5660 E Franklin Rd.  
Nampa, ID 83687<sup>2</sup>

<sup>1</sup> See, e.g., authorization under File No. BPED-19990518MB.

<sup>2</sup> Nampa, ID is within the 60 dBu contour of KRRB(FM), and well under 25 miles from the center of Kuna, ID. Consequently, this location complies with 47 C.F.R. § 73.1125(a).

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The telephone number is 800-726-1191.

The costs of maintaining main studio space in the Kuna, ID area, at a considerable distance from the main studio of the flagship station for PCC's educational network, will soon become cost-prohibitive for PCC, a non-profit educational institution. PCC therefore respectfully requests a waiver of 47 C.F.R. 73.1125 to permit the relocation of the main studio of KRRB(FM) from its location within the principal community contour of KRRB(FM), to the main studio of PCC's co-owned station WPCS (NCE-FM), Pensacola, FL (FIN: ). The proposed studio location is approximately 2900 kilometers (1812.50 miles) outside of the 1.0 mV/m contour of KRRB(FM).

Section 73.1125(a)(4) permits a radio broadcast station to maintain a main studio outside of its community of license or other locations permitted by Section 73.1125(a)(3) when "... good cause exists for locating the main studio outside the station's principal community contour and that to do so would be consistent with the operation of the station in the public interest." The Commission has recognized the special considerations of non-commercial stations with regard to main studio locations. See, e.g., *In the Matter of Amendment of Sections 73.1125 and 73.1130 of the Commission's Rules, the Main Studio and Program Origination Rules for Radio and Television Broadcast Stations*, 3 FCC Rcd. 5024, 5027 (1988) (hereinafter "*Main Studio Reconsideration Order*"). As the Commission has noted:

[T]he realities of public broadcasting funding and the ongoing problems of educational licensees raising the necessary funds to expand and provide non-commercial educational programming to all our citizens.... [S]avings realized from not having to construct a main studio can be utilized to assist...in expanding quality programming to a greater number of viewers.

*Lift Him Up Ministries, Inc.*, 3 FCC RCD. 5571, 5572 (1988).

While the Commission requires NCE stations to serve their communities of license, the Commission has nonetheless long "recognized the benefits of centralized operations for non-commercial educational stations, given the limited funding available to these stations[.]" See *Main Studio Reconsideration Order* at \_\_\_. It has therefore "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." *Id.* For NCE stations, the Commission has repeatedly found "good cause" to exist in numerous instances based solely upon a showing that centralized operations will provide an economic benefit to noncommercial stations that have limited funding, as long as local service obligations are met. See *Letter to Roy R. Russo, Esq.*, dated January 24, 1994; *Letter to Richard J. Bodorff*, dated January 2, 1992; *The President and Board of Trustees of the Kuna University*, 7 FCC Rcd 2902 (1992); *The Cedarville College*, 6 FCC Rcd 538 (1991); *Letter to Gerald Stevens-Kittner, Esq.*, dated July 15, 1991; *Sound of Life, Inc.*, 4 FCC Rcd 8273 (1989); *Lift Him Up Outreach Ministries, Inc.*, *supra*; *Georgia State Board of*

*Education*, 70 F.C.C.2d 948 (1979), *recon. denied*, 71 F.C.C.2d 227 (1979); *Nebraska Educational Television Comm'n*, 4 R.R.2d 771 (1965).

PCC respectfully submits that PCC's request for main studio waiver to operate KRRB as a satellite of WPCS(FM) is supported by good cause, and should be granted. First, a grant of the requested waiver will simply serve as a continuance of the manner in which KRRB(FM) has operated for years. Prior to PCC becoming licensee of KRRB(FM), the station was operated by the previous licensee, EMF, as a satellite operation of Station KYRA(FM) Thousand Oaks, California (FCC ID#21689) as authorized in BLED-20161206AAE. PCC's waiver request asks no more than to continue to operate KRRB(FM) as a satellite operation – only as a satellite operation of its WPCS(FM) rather than EMF's KYRA(FM).

Second, the Commission previously granted PCC authority to operate KPCS(FM) as a satellite of WPCS(FM), and PCC proposes to operate KRRB(FM) in the same manner, which the Commission previously found to provide good cause for a waiver of Section 73.1125(a)(3). As in the case of KPCS(FM), PCC proposes to operate KRRB(FM) as part of a network of radio broadcast stations operated by Pensacola known as "Rejoice Radio." Each network station operates non-commercially and broadcasts the non-commercial educational programming carried on Rejoice Radio. By co-locating KRRB(FM)'s main studio at WPCS's main studio in Pensacola, PCC will realize valuable economies of scale and cost savings, which are needed to maintain the high quality of Rejoice Radio's noncommercial educational programming. As a listener-supported station, KRRB(FM) will face financial constraints. The obligation to maintain separate staffing and studio locations for both KRRB(FM) and WPCS will place a serious financial burden on Pensacola and divert the limited resources are available for Rejoice Radio's programming efforts.

Specifically, PCC will undertake to serve the Kuna, ID community through activities similar to those it has undertaken to serve the listeners of KPCS(FM) in Princeton, MN. PCC will use a variety of ascertainment procedures, such as to conduct an annual telephone survey of randomly selected residents of Kuna to determine the principle issues of concern. Further, PCC personnel will conduct other periodic outreach from time to time, for example, by providing direct mailing to listeners in Kuna soliciting their comments and suggestions regarding our programming and the needs of the community. PCC may also appoint a local public affairs representative, who may be a volunteer, who will be available in the community of Kuna, Idaho to conduct interviews and surveys of local community leaders and other residents.

PCC will continue to maintain the toll-free telephone number provided above for the Kuna area, to permit Kuna residents to telephone the studio in Pensacola. PCC also will maintain access to the local public file for the station within the community of Kuna in accordance with the requirements set forth in 47 CFR 73.3527, either via computer terminal or physical files, at least until the public file is fully available on-line in accordance with recent rule changes.

For all the foregoing reasons, PCC respectfully submits that good cause exists, under Section 73.1125(b)(2) of the Commission's rules, to locate KRRB(FM)'s main studio outside of the city grade community and contour of the station and more than 25 miles from the reference coordinates of the center of Kuna, Idaho. PCC further respectfully submits that the public interest will be served by the consolidation of KRRB(FM)'s main studio with WPCS's main studio; such consolidation will allow for the efficient and costs-effective operation of KRRB as a member station of the Rejoice Radio network, which will in turn allow PCC to focus its limited financial resources on the provision of high-quality educational and ministerial programming to listeners. PCC therefore respectfully requests that the requested waiver be expeditiously granted.

Thank you for your prompt attention to this matter. If you have any questions or require additional information, kindly contact the undersigned counsel for PCC.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Christine McLaughlin', with a stylized flourish at the end.

Christine McLaughlin