



# Fletcher, Heald & Hildreth

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Federal Communications Commission  
Office of the Secretary

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June 2, 2017

PLEASE STAMP  
AND RETURN  
THIS COPY TO  
FLETCHER, HEALD & HILDRETH

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

Re: Request for Main Studio Waiver  
KAOW(FM), Fort Smith, Arkansas, FCC Facility ID 1617, and  
KASD(FM), Rapid City, South Dakota, FCC Facility ID 88804  
Community Broadcasting, Inc., FRN 0005014162

Attention: Audio Division, Media Bureau

Dear Ms. Dortch:

On behalf of Community Broadcasting, Inc., submitted herewith is a request for a waiver of Section 73.1125(b) of the Commission's Rules to allow the main studio of noncommercial educational stations KAOW(FM), Fort Smith, AR and KASD(FM), Rapid City, SD, to be collocated with the main studio of Station KSIV-FM in St. Louis, Missouri..

As KAOW and KASD are noncommercial educational stations, no filing fee is required for this request.

If there are any questions about this request, please contact the undersigned.

Very truly yours,

Kathleen Victory  
Counsel for  
Community Broadcasting

Attachment

cc: (by e-mail)  
Ms. Karen Workeman (w/att-by e-mail)  
Mr. Michael Wagner (w/att by email)

## MAIN STUDIO RULE WAIVER REQUEST

Community Broadcasting, Inc. ("CBI") respectfully requests a waiver of Section 73.1125 of the Commission's rules to permit it to locate the main studio for Stations KAOW(FM), Fort Smith, Arkansas, Facility ID 1617, and KASD(FM), Rapid City, South Dakota, Facility ID 88804, at the studios of KSIV-FM, St. Louis, Missouri. CBI is a non-profit, charitable corporation organized under Section 501(c) of the Internal Revenue Code. CBI is the licensee of a number non-commercial educational stations. These stations are part of the Bott Radio Network ("BRN"), also a not-for-profit entity, which provides programming to them from CBI's headquarters in Overland Park, Kansas. CBI seeks a waiver of the main studio rule in order to operate KAOW and KASD primarily as satellites of and from the studios of station KSIV-FM at St. Louis, Missouri. In support of this request the following is shown:

**Main studio location and program originations:** KAOW and KASD's main studio will be located at 1750 South Brentwood Boulevard, Suite 811, St. Louis, Missouri 63114. This is the main studio location of KSIV-FM, St. Louis, Missouri, a co-owned noncommercial educational FM station. Programming will originate either from KSIV-FM or from CBI's headquarters and uplink location in Overland Park, Kansas. (KSIV-FM's programs are for the most part identical to those uplinked from Overland Park.)

**Toll-free telephone number:** Toll-free telephone lines will connect Fort Smith, AR and Rapid City, SD to CBI's headquarters in Overland Park, Kansas, the origination point for most of the programming to be broadcast on KAOW and KASD.

**Local public file:** Both the KAOW and KASD public files (which are not yet

required to be on the FCC's online site) will be located at the studios of KSIV-FM in St. Louis.

**Ascertainment of community issues:** Management-level personnel will contact leaders in Fort Smith and Rapid City and the surrounding service areas to ascertain problems and issues that can be incorporated into the programming of the relevant station. Such contacts will be made at least quarterly by phone, e-mail, or through in-person visits.

**Cost Savings.** Public funding is not available for private non-profit broadcast organizations such as CBI. CBI respectfully submits that due to the limited financial resources available to support the station and the unavailability of public funding, a waiver of the main studio rule will serve the public interest. The use of CBI's fully-equipped studios in St. Louis or Overland Park will provide far better facilities for producing programming directed to the Hastings area, and at a much lower cost and will enable CBI to realize cost savings that will facilitate the provision of high-quality, non-commercial programming to the public.

The Commission has repeatedly recognized the benefits of centralized operations for NCE stations, given their limited funding, and thus has found that good cause exists to waive the main studio rule where satellite operations are proposed, provided that those operations satisfy the Section 73.1125 public interest standard. Accordingly, based on the foregoing showing and commitments, CBI hereby requests that the Commission find, pursuant to Section 73.1125(B)(2) of the rules, that the public interest will be served by operation of KAOW and KASD as satellites of KSIV-FM with its main studio located in St. Louis, Missouri.