## AMERICAN FAMILY RADIO

P. O. Drawer 3206 • 107 Parkgate • Tupelo, Mississippi 38803 662-844-8888 • FAX 662-842-6791 20050826APO

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ORIGINAL

August 24, 2005

Ms Marlene H. Dortch, Secretary Federal Communication Commission 445 12<sup>TH</sup> Street, SW, Suite 222 Washington, D.C. 20024

Re: WFFL, Panama City, FL; Facility ID. No. 85581

Dear Ms. Dortch:

Enclosed is an original and two copies of a Minor Modification for the above referenced file. American Family Association is requesting a Waiver of the Federal Communications Commission's rule §73.1125. AFA is requesting a waiver of WFFL, to our licensed facility of WAFR in Tupelo, MS.

This waiver will enable AFA to realize the economic benefits of a centralized operation, as the Commission has recognized (Memorandum Opinion and Order in MM Docket 86-406, 3 FCC Red 5024 (1988)).

Also enclosed is an extra copy to be stamped as received and returned to us in the self addressed, stamped envelope. If you or your staff has any questions concerning the enclosed, please contact me.

Sincerely,

Marsha Shrader

Director of Network Development

Taisha Shrader

**Enclosure** 

## AMERICAN FAMILY ASSOCIATION WFFL PANAMA CITY, FL

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## REQUEST FOR WAIVER OF §73.1125

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Petitioner American Family Association, Inc. ("Family") submits the following in support of its request for a waiver of the main studio rule set forth in §73.1125 of the Commission's rules:

- 1. Family holds the licenses for approximately 200 NCE-FM stations which it operates as the American Family Radio Network with headquarters in Tupelo, MS.
- 2. Family has a Construction Permit for a non-commercial educational FM broadcast station in Panama City, FL., (WFFL).
- 3. In order to obtain the economic benefits of centralized operations, as the Commission has recognized (Memorandum Opinion and Order in MM Docket 86-406, 3 FCC Rcd 5024 (1988)), Family intends to deliver its signal from the studios of WAFR, Tupelo, MS to the licensed broadcast facility in Panama City, FL.
- 4. Family is cognizant of its local service obligations, and has developed a plan to allow it to determine local needs and respond to them in its programming. This plan will include, at a minimum, the following components:
  - {a} Family will add to its Community Advisory Board at least one resident of Panama City, FL, who will be asked to provide recommendations on community needs and programming directly to the management of Family;
  - {b} Family will, during each regular "Shareathon" (pledge drives normally held every six months), solicit listeners' opinions regarding community issues that should be addressed during program planning. Family will track the listener response by community and factor those responses in its planning of the program schedule and the issues to be addressed:
  - {c} Family will provide periodic local programming for Panama City, FL, coverage of significant local news or cultural events;
  - {d} Family will provide for the broadcast of local public service announcements:

## AMERICAN FAMILY ASSOCIATION WFFL PANAMA CITY, FL

- {e} Family will maintain a toll-free number for the community of South Vienna.
- 5. Because of the limited funding available to non-commercial educational broadcast stations, and the economic benefits of centralized operation, Family respectfully requests a waiver of the requirement of maintaining a main studio within the principal community contour, as provided in §73.1125 (a) (4) of the Commission's rules.