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December 13, 2013

ACCEPTED/FILED

DEC 13 2013

Federal Communications Commission  
Office of the Secretary

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\* NOT ADMITTED IN VIRGINIA

VIA HAND DELIVERY

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

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

Attn: Audio Division, Media Bureau

Re: Request for Waiver and/or Amendment of Waiver of Main Studio Rule  
Family Stations, Inc.

KKAA(AM), Aberdeen, SD, Fac. ID 15965; KQKD(AM), Redfield, SD, Fac. ID 70083;  
KECR(AM), El Cajon, CA, Fac. ID 20977; KFRN(AM), Long Beach, CA, Fac. ID 21005;  
KEBR(AM), Rocklin, CA, Fac. ID 20930; KPHF(FM), Phoenix, AZ, Fac. ID 20879; KHAP(FM),  
Chico, CA, Fac. ID 20732; KEFR(FM), LeGrand, CA, Fac. ID 20997; KFNO(FM), Fresno, CA,  
Fac. ID 20924; KFRB-FM, Bakersfield, CA, Fac. ID 20902; KFRJ(FM), China Lake, CA, Fac. ID  
89174; KFRP(FM), Coalinga, CA, Fac. ID 89308; KFRS-FM, Soledad, CA, Fac. ID 86669; and  
KPRA(FM), Ukiah, CA, Fac. ID 20887 (the "Stations")

Dear Ms. Dortch:

Family Stations, Inc., license of the above-referenced stations, submits herewith the attached  
Request for Waiver and/or Amendment of Waiver of Main Studio Rule.

Should any questions arise in connection with this matter, please contact the undersigned.

Sincerely,



Michelle A. McClure  
Counsel for Family Stations, Inc.

cc: Penelope Dade (via email – [penelope.dade@fcc.gov](mailto:penelope.dade@fcc.gov))  
Peggy L. Renschler (date stamped copy via email)

**FAMILY STATIONS, INC.**  
290 Hegenberger Road  
Oakland, CA 94621

December 12, 2013

**VIA HAND DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Request for Waiver and/or Amendment of Waiver of Main Studio Rule  
Family Stations, Inc.  
KKAA(AM), Aberdeen, SD, Fac. ID 15965; KQKD(AM), Redfield, SD, Fac. ID 70083;  
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89174; KFRP(FM), Coalinga, CA, Fac. ID 89308; KFRS-FM, Soledad, CA, Fac. ID 86669; and  
KPRA(FM), Ukiah, CA, Fac. ID 20887 (the "Stations")

Dear Ms. Dortch:

Family Stations, Inc. ("FSI"), the licensee of the above-referenced noncommercial educational ("NCE") radio stations, seeks a waiver and/or amendment of the already existing waiver of the Commission's main studio rules, 47 C.F.R. Section 73.1125. FSI requests authorization to operate the Stations as a satellite of KEAR(AM), San Francisco, CA, Fac. ID 1082, the main studio of which is located at the FSI corporate headquarters in Oakland, CA.

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 NCE satellite operations are proposed. *See, e.g., Letter from H. Taft Snowden to Alan C. Campbell, 1800B3-MH (2002) (granting waiver of the main studio rule to permit WEFR(AM), Erie, PA, to operate as a satellite of co-owned WJCH(FM), Joliet, Illinois) ("WEFR Waiver"); Delmarva Educational Association, 19 FCC Rcd 6793 (2004); Amendment of Section 73.1125 and 73.1130 of the Commission's Rules, 3 FCC Rcd 5024, 5027 (1988).* In each such case, the Commission staff determined that the waivers were justified on the basis of the limited funding available to the stations, the increased efficiencies resulting from co-location of studios, and the public interest benefits that result from such satellite operation.

FSI is a non-profit corporation that produces and delivers, via satellite or Internet delivery, Family Radio Network noncommercial educational programming to more than 60 NCE radio broadcast stations across the United States. The majority of the FSI stations currently operate pursuant to main studio waivers. *See, e.g., WEFR Waiver, supra.*

Except for KECR(AM) and KEBR(AM), the Stations have all successfully operated as satellite stations for over ten years without complaints from the communities of license about its lack of a local main studio. KECR(AM) and KEBR(AM) were both formerly one of FSI's parent stations. However, FSI is seeking approval to further centralize its operations and convert KECR(AM) and KEBR(AM) to satellite operations in addition to the remainder of the Stations, allowing it to substantially reduce its operating costs and allow more of its resources to be directed towards programming. FSI's previous record of successfully operating the majority of its stations as

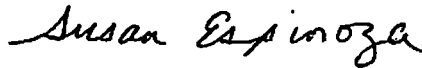
satellite stations demonstrates that the same operating structure can be provided by KECR(AM) and KEBR(AM) as satellite stations.

In addition to requesting new main studio waivers for KECR(AM) and KEBR(AM), FSI requests amendment to the current main studio waivers of the balance of the Stations, most notably the requirements to maintain paper public files in each individual community of license. This requirement is a financial and administrative burden which diverts FSI's limited resources from Family Radio's programming efforts; if Family Radio is able to centralize the public file operations of the Stations with other stations using its website, it will be able to substantially reduce its compliance costs and direct more money to its programming, while making it easier for residents to obtain the information it contains.

In consideration of the public interest obligations incumbent on broadcast licensees, FSI proposes the following to ensure that the Stations fulfill its local services obligations to the residents of its communities of license: (i) on at least a quarterly basis, an employee representative of FSI will conduct interviews and surveys of local community leaders and residents to ascertain the interests, concerns, and needs of the community and its listeners, which feedback will be used to develop responsive local public affairs programming; (ii) FSI will establish and advertise a toll-free telephone number for use by residents of each Stations' community of license to contact FSI personnel about the Stations; and (iii) FSI will make the contents of the Stations' public inspection files, which will be maintained at the KEAR(AM) studio, available on the Internet and/or provide accommodations for listeners wishing to review the contents of the public file.

In light of the foregoing, FSI requests that the Commission find, pursuant to Section 73.1125(b)(2) of the Commission's rules, that the public interest will be served and good cause exists to grant the modification of the Stations (other than KECR(AM) and KEBR(AM)) current main studio waiver and grant of a main studio waiver for KECR(AM) and KEBR(AM) to allow for the posting of each Stations' public file on the Internet instead of at a location in the Stations' community of license and to allow the Stations to operate as satellite stations of KEAR(AM) in San Francisco, CA.

Respectfully submitted,



Susan Espinoza  
Secretary Treasurer