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November 1, 2013

PLEASE STAMP
AND RETURN
THIS COPY TO
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ACCEPTED/FILED

NOV 1 2013

Federal Communications Commission
Office of the Secretary
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* NOT ADMITTED IN VIRGINIA

VIA HAND DELIVERY

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

Attn: Audio Division, Media Bureau

Re: Station WCTF (AM), Vernon, CT (Facility Id. No. 20826)
Application to Modify Main Studio Waiver

Dear Ms. Dortch:

Family Stations, Inc., licensee for Station WCTF (AM), Vernon, CT (Facility Id. No. 20826), submits herewith in triplicate FCC Form 302-AM seeking to amend the main studio waiver for WCTF (AM). No filing fee is required for this application.

Should any questions arise in connection with this matter, please communicate directly with this office.

Very truly yours,



Jonathan R. Markman
Counsel for Family Stations, Inc.

cc: WBMD Public Inspection File

FOR
FCC
USE
ONLY

FCC 302-AM
APPLICATION FOR AM
BROADCAST STATION LICENSE
(Please read instructions before filling out form.)

FOR COMMISSION USE ONLY
FILE NO.

SECTION I - APPLICANT FEE INFORMATION			
1. PAYOR NAME (Last, First, Middle Initial) Family Stations, INC.			
MAILING ADDRESS (Line 1) (Maximum 35 characters) 4135 NORTHGATE BOULEVARD			
MAILING ADDRESS (Line 2) (Maximum 35 characters) SUITE 1			
CITY SACRAMENTO	STATE OR COUNTRY (if foreign address) CA	ZIP CODE 95834	
TELEPHONE NUMBER (include area code) 916-641-8191	CALL LETTERS WCTF	OTHER FCC IDENTIFIER (If applicable) FACILITY ID NO. 20826	
2. A. Is a fee submitted with this application?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B. If No, indicate reason for fee exemption (see 47 C.F.R. Section			
<input type="checkbox"/> Governmental Entity <input checked="" type="checkbox"/> Noncommercial educational licensee <input type="checkbox"/> Other (Please explain):			
C. If Yes, provide the following information:			
Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in the "Mass Media Services Fee Filing Guide." Column (B) lists the Fee Multiple applicable for this application. Enter fee amount due in Column (C).			
(A)	(B)	(C)	
FEE TYPE CODE	FEE MULTIPLE	FEE DUE FOR FEE TYPE CODE IN COLUMN (A)	FOR FCC USE ONLY
	0 0 0 1	\$	
To be used only when you are requesting concurrent actions which result in a requirement to list more than one Fee Type Code.			
(A)	(B)	(C)	
	0 0 0 1	\$	FOR FCC USE ONLY
ADD ALL AMOUNTS SHOWN IN COLUMN C, AND ENTER THE TOTAL HERE. THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED REMITTANCE.		TOTAL AMOUNT REMITTED WITH THIS APPLICATION	FOR FCC USE ONLY
		\$	

CLEAR ALL PAGES

SECTION II - APPLICANT INFORMATION		
1. NAME OF APPLICANT FAMILY STATIONS, INC.		
MAILING ADDRESS 4135 NORTHGATE BOULEVARD, SUITE 1		
CITY SACRAMENTO	STATE CA	ZIP CODE 95834

2. This application is for:

Commercial Noncommercial

AM Directional AM Non-Directional

Call letters WCTF	Community of License Vernon, CT	Construction Permit File No. N/A	Modification of Construction Permit File No(s). N/A	Expiration Date of Last Construction Permit N/A
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3. Is the station now operating pursuant to automatic program test authority in accordance with 47 C.F.R. Section 73.1620? Yes No

Exhibit No.
1

If No, explain in an Exhibit.

4. Have all the terms, conditions, and obligations set forth in the above described construction permit been fully met? Yes No

Exhibit No.

If No, state exceptions in an Exhibit.

5. Apart from the changes already reported, has any cause or circumstance arisen since the grant of the underlying construction permit which would result in any statement or representation contained in the construction permit application to be now incorrect? Yes No

Exhibit No.

If Yes, explain in an Exhibit.

6. Has the permittee filed its Ownership Report (FCC Form 323) or ownership certification in accordance with 47 C.F.R. Section 73.3615(b)? Yes No

Does not apply

Exhibit No.

If No, explain in an Exhibit.

7. Has an adverse finding been made or an adverse final action been taken by any court or administrative body with respect to the applicant or parties to the application in a civil or criminal proceeding, brought under the provisions of any law relating to the following: any felony; mass media related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination? Yes No

Exhibit No.

If the answer is Yes, attach as an Exhibit a full disclosure of the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), and the disposition of the litigation. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 U.S.C. Section 1.65(c), the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding which the application or Section 1.65 information was filed, and the date of filing; and (ii) the disposition of the previously reported matter.



8. Does the applicant, or any party to the application, have a petition on file to migrate to the expanded band (1605-1705 kHz) or a permit or license either in the existing band or expanded band that is held in combination (pursuant to the 5 year holding period allowed) with the AM facility proposed to be modified herein?

Yes No

If Yes, provide particulars as an Exhibit.

Exhibit No.

The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because use of the same, whether by license or otherwise, and requests and authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended).

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in

CERTIFICATION

1. By checking Yes, the applicant certifies, that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b).

Yes No

2. I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name SUSAN ESPINOZA	Signature <i>Susan Espinoza</i>	
Title SECRETARY TREASURER	Date 10-31-13	Telephone Number 510-568-6200

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of the application is in the public interest. In reaching that determination, or for law enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Your response is required to obtain the requested authorization.

Public reporting burden for this collection of information is estimated to average 639 hours and 53 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Records Management Branch, Paperwork Reduction Project (3060-0627), Washington, D. C. 20554. Do NOT send completed forms to this address.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.



SECTION III - Page 2

9. Description of antenna system ((f directional antenna is used, the information requested below should be given for each element of the array. Use separate sheets if necessary.)

Type Radiator	Overall height in meters of radiator above base insulator, or above base, if grounded.	Overall height in meters above ground (without obstruction lighting)	Overall height in meters above ground (include obstruction lighting)	If antenna is either top loaded or sectionalized, describe fully in an Exhibit. <div style="border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;">Exhibit No.</div>
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Excitation Series Shunt

Geographic coordinates to nearest second. For directional antenna give coordinates of center of array. For single vertical radiator give tower location.

North Latitude	° ' "	West Longitude	° ' "
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If not fully described above, attach as an Exhibit further details and dimensions including any other antenna mounted on tower and associated isolation circuits.

Exhibit No.

Also, if necessary for a complete description, attach as an Exhibit a sketch of the details and dimensions of ground system.

Exhibit No.

10. In what respect, if any, does the apparatus constructed differ from that described in the application for construction permit or in the permit?

11. Give reasons for the change in antenna or common point resistance.

I certify that I represent the applicant in the capacity indicated below and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

Name (Please Print or Type) Linda Adams	Signature (check appropriate box below) 
Address (include ZIP Code) Family Stations, Inc. 4135 Northgate Blvd., Suite 1 Sacramento, CA 95834	Date 10/18/2013
	Telephone No. (Include Area Code) (916)641-8191

- | | |
|---|---|
| <input type="checkbox"/> Technical Director | <input type="checkbox"/> Registered Professional Engineer |
| <input type="checkbox"/> Chief Operator | <input checked="" type="checkbox"/> Technical Consultant |
| <input type="checkbox"/> Other (specify) | |



Request for Modification of Main Studio Waiver

Family Stations, Inc. (“FSI”), licensee of Station WCTF (AM), Facility Id. No. 20826, Vernon, CT, respectfully requests a modification of its waiver of the Commission’s main studio rule, 47 C.F.R. § 73.1125, to permit WCTF, a satellite of Noncommercial Educational (“NCE”) Station WFSI, to satisfy the public file requirement through online access, rather than requiring a paper file to be maintained in Vernon, CT and to allow it to become a satellite station of KEAR (AM), Facility Id. No. 1082, San Francisco, California, the main studio of which is located at the FSI corporate headquarters in Oakland, California.

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 Snowdon 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.*

WCTF is one of those stations, and it has successfully operated as a satellite station for over ten years without complaints from the community about its lack of a local main studio. However, the requirement to maintain a paper public file in Vernon, CT 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 WCFT 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 WCTF fulfills its local service obligations to the residents of Vernon, CT: (i) on at least on 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 Vernon listeners, which feedback will be used to develop responsive local public affairs programming; (ii) FSI will establish and advertise a toll-free telephone number to for use by residents of Vernon to contact FSI personnel about the station; and (iii) FSI will make the contents of the WCTF public inspection file, which will be maintained at the KEAR studio, available on the Internet and/or provide accommodations for listeners wishing to review the contents 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 by the modification of WCTF's main studio waiver to allow for the posting of its public file on the Internet instead of at a location in Vernon, CT, and to allow it to operate as a satellite station of KEAR (AM) in San Francisco, CA, and therefore that good cause exists to grant a modified waiver of the main studio rule in this instance.