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ACCEPTED/FILED

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Federal Communications Commission  
Office of the Secretary

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**VIA HAND DELIVERY**

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

Attn: Audio Division, Media Bureau

Re: Request for Waiver of Main Studio Rule  
Family Stations, Inc.  
WFME(AM), New York, NY; Facility ID 29024

Dear Ms. Dortch:

Family Stations, Inc., licensee of the above-referenced station, submits herewith the attached Request for 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.

Enclosure

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

June 30, 2015

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 of Main Studio Rule  
Family Stations, Inc.  
WFME(AM), New York, NY; Facility ID 29024

Dear Ms. Dortch:

Family Stations, Inc. ("FSI"), the licensee of the above-referenced noncommercial educational ("NCE") radio station, seeks a waiver of the Commission's main studio rules, 47 C.F.R. Section 73.1125. FSI requests authorization to operate WFME(AM) 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.*

The majority of FSI's stations operating as satellite stations, have all successfully operated such for over ten years without complaints from the communities of license about its lack of a local main studio. FSI is seeking approval to convert WFME(AM) to satellite operation in addition to the other satellite 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 WFME(AM) as a satellite station.

As part of the request for a main studio waiver for WFME(AM), FSI requests waiver of 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; Family Radio has centralized the public file operations of its stations using its website, which substantially reduces its compliance costs and directs 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 WFME(AM) fulfills its local service obligations to the residents of its community 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 WFME(AM)'s community of license to contact FSI personnel about WFME(AM); and (iii) FSI will make the contents of WFME-AM's public inspection file, 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 a main studio waiver for WFME(AM) to allow for the posting of WFME(AM)'s public file on the Internet instead of at a location in WFME(AM)'s community of license and to allow WFME(AM) to operate as a satellite station of KEAR(AM) in San Francisco, CA.

Respectfully submitted,



Susan Espinoza  
Secretary