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DUPLICATE  
T. STANSBURY

# Wiley, Rein & Fielding

1776 K Street, N.W.  
Washington, D.C. 20006  
(202) 719-7000

Todd M. Stansbury  
(202) 719-4948  
tstansbu@wrf.com

Fax: (202) 719-7049  
www.wrf.com

February 11, 2000

RECEIVED  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
12th Street Lobby, TW-A325  
Washington, D.C. 20554

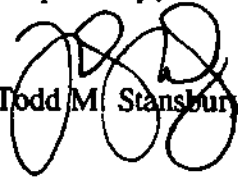
Re: KBPR(FM), Brainerd, MN  
Facility No. 42912  
Minnesota Public Radio  
Supplement to Request for Waiver of the Main Studio Rule

Dear Ms. Salas:

On behalf of Minnesota Public Radio, enclosed for filing, in triplicate, is a supplement to the request for waiver of the main studio rule for the station referenced above.

Kindly contact this office if there are any questions.

Respectfully submitted,

  
Todd M. Stansbury

cc: Allen Myers, FCC  
Michael Wagner, FCC



February 8, 2000

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
12th Street Lobby, TW-A325  
Washington, D.C. 20554

Re: KBPR(FM), Brainerd, MN  
Facility No. 42912  
Minnesota Public Radio  
Supplement to Request for Waiver of the Main Studio Rule

Dear Ms. Salas:

Minnesota Public Radio ("MPR"), hereby supplements its pending request, originally filed on November 23, 1998, for a waiver of the main studio rule, 47 C.F.R. § 73.1125, to operate KBPR(FM), Brainerd, Minnesota, as a satellite of KSJN(FM), Minneapolis, Minnesota. MPR offers this supplement to emphasize its commitment to serve the needs of its local communities upon grant of a main studio waiver.

In its original request for waiver, MPR noted that it maintains, and will continue to maintain, contact with the local Brainerd community through numerous means, including:

1. Assignment of a reporter who will be responsible for the production and broadcast of program inserts of interest to the residents of Brainerd. This programming would be broadcast by MPR's station in Brainerd, as well as by other stations in the MPR network. The reporter currently is located in Brainerd. If this reporter is relocated to a different community in the future, MPR will ensure that he or she continues to maintain the same contacts with Brainerd.
2. Continuation of meaningful contact with Brainerd citizens. A MPR reporter would subscribe to local and area publications and maintain ongoing relationships with community residents and leaders, who would be contacted on a regular basis (at a minimum, at least once a year). The reporter would use information provided by these publications and contacts to investigate events and to file news stories of interest in Brainerd for broadcast by MPR, either regionally or throughout the MPR multi-station network. The reporter also would serve as a liaison between Brainerd-area residents and MPR's programming management.
3. Continuation of an existing relationship with the community of Brainerd by means of membership in the MPR organization. MPR actively solicits comments from its members, including members in the Brainerd service area, concerning programming and station operations and ensures that member requests and recommendations are thoughtfully considered in making programming decisions affecting the Brainerd station.

4. Maintenance of a World Wide Web site ([www.mpr.org](http://www.mpr.org)), which contains extensive descriptions of MPR's programming and provides another means (email and an interactive forum) for Brainerd residents to comment on station operations.

5. Maintenance of a toll-free telephone number, which allows Brainerd residents to contact MPR management to express concerns about station programming and operations.

6. Establishment of a Member Listener Services Department that currently consists of six full-time persons whom local residents may contact via a toll-free number to voice comments and concerns about programming.

7. Operation of the largest news organization of any radio service in the Midwest, which enables MPR to produce news programming from throughout its service area, including Brainerd, and distribute it to all stations in the network.

8. Creation of and participation in MPR's "Local Link"™ program, which is designed to enhance local news coverage in rural and small communities, such as Brainerd.

MPR engages in additional proactive efforts to serve its local communities. For example, MPR operates a traveling *Mainstreet Radio*® crew currently consisting of four to five people, which gathers and produces programming material from rural and small city locations, such as Brainerd, for broadcast on MPR's extensive radio network. *Mainstreet Radio*® has four goals:

- a. To provide listeners throughout Minnesota with compelling stories, insights and perspectives from rural people and places;
- b. To link the state in common understanding of rural issues and foster a sense of the shared destiny of all Minnesota;
- c. To provide a local and regional context for issues that are global and universal; and
- d. To create a body of work that will help rural communities deal effectively with their issues.

This program generates several programs per week for distribution on the MPR network and frequent live remote broadcasts on the MPR network from outstate (not the Twin Cities of Minneapolis and Saint Paul). A detailed list of the programming produced by *Mainstreet Radio*™ can be viewed at <http://news.mpr.org/programs/mainstreet>.

Also, MPR promotes interaction between its management and local community leaders through several advisory boards, including an Institutional Sponsor Council ("ISC") and, as required by the Corporation for Public Broadcasting ("CPB"), five Regional Development Advisory Councils ("RDACs"). As more fully described in a letter to the FCC dated November 4, 1998 regarding main studio waiver requests for KNGA(FM) and KGAC(FM), Saint Peter, Minnesota (FCC File Nos. BPED-970203IC, IE), the ISC is a unique partnership between MPR's

stations and colleges and universities throughout their listening areas. This venture enhances MPR's community representation and provides another forum for persons affiliated with the ISC members to discuss public affairs, programming, development, marketing and technology with MPR.

The RDACs are managed by MPR station managers currently located in Rochester (southeastern MN), Duluth (northeastern MN), Moorhead (northwestern MN), Saint Cloud (central MN), Minneapolis/Saint Paul and Bemidji (north-central MN). The RDACs provide input to management on programming, which MPR thoughtfully considers when making program decisions for its stations, including the facilities in Brainerd. It is MPR policy that residents of each of its service areas, including the Brainerd area, participate on a RDAC. RDACs currently meet quarterly and summaries of these meetings are supplied to MPR's Board of Trustees. In the past year, most of MPR's vice presidents have attended each of the RDAC meetings, and other members of MPR's management team have regularly participated as well. Members of the RDACs serve for terms of office. MPR's RDACs are in full compliance with CPB requirements for this type of advisory council.

The Commission has relied on substantially similar representations by MPR in finding that waivers of the main studio rule for other stations served the public interest. Thus, the Commission has held that where MPR has pledged to (1) continue its policy for local residents to serve on a RDAC; (2) continue the relationship with the local community through membership; (3) solicit comment from residents regarding station operation and programming; (4) assign a reporter (who would be based in another community within the same region) to be responsible for subscribing to local publications and maintaining periodic contact with local residents; (5) maintain a local toll-free telephone number; and (6) operate a site on the world wide web, a waiver is warranted. See Letter from Linda Blair, Chief, Audio Services Division, Mass Media Bureau, to Todd M. Stansbury, Ref. No. 1800B3-ALM (May 6, 1996) (waiving the main studio rule for new FM at Buhl, MN, FCC File No. BPED-950919MB), as modified by Letter from Dennis Williams, Assistant Chief, Audio Services Division, to Todd M. Stansbury (Nov. 15, 1996) (attached). MPR is making the same pledges with respect to the Brainerd station.

In sum, MPR aggressively seeks the input of all communities served by its stations, including Brainerd, to address local needs and interests. Accordingly, waiver of the main studio rule with respect to KBPR would serve the public interest.

Respectfully submitted,



Mitzi T Gramling  
Associate General Counsel

cc: Allen Myers, FCC