

Wiley, Rein & Fielding

75693.4.2
DUPLICATE

T. STANSBURY

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

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

RECEIVED
FEB 11 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: New FM, Grand Marais, MN
Facility No. BPED-981204MB
File No. 92302
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 facility proposed in the application 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: New FM, Grand Marais, MN
Facility No. 92302
File No. BPED-981204MB
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 for a waiver of the main studio rule, 47 C.F.R. § 73.1125, to operate the new FM station proposed in the application referenced above in Grand Marais, Minnesota, as a satellite of KNOW(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 will maintain contact with the local Grand Marais 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 Grand Marais. This programming would be broadcast by MPR's station in Grand Marais, as well as by other stations in the MPR network. The reporter currently is located in nearby Duluth, Minnesota.
2. Continuation of meaningful contact with Grand Marais 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 Grand Marais for broadcast by MPR, either regionally or throughout the MPR multi-station network. The reporter also would serve as a liaison between Grand Marais-area residents and MPR's programming management.
3. Continuation of an existing relationship with the community of Grand Marais by means of membership in the MPR organization. MPR actively solicits comments from its members, including members in the Grand Marais service area, concerning programming and

station operations and ensures that member requests and recommendations are thoughtfully considered in making programming decisions affecting the Grand Marais station.

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

5. Maintenance of a toll-free telephone number, which allows Grand Marais 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 Grand Marais, 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 Grand Marais.

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 Grand Marais, 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 Grand Marais. It is MPR policy that residents of each of its service areas, including the Grand Marais 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 Grand Marais station.

In sum, MPR aggressively seeks the input of all communities served by its stations, including Grand Marais, to address local needs and interests. Accordingly, waiver of the main

Magalie Roman Salas
February 8, 2000
Page 4

studio rule with respect to the new FM station described in File No. BPED-981204MB would serve the public interest.

Respectfully submitted,



Mitzi T Gramling
Associate General Counsel

cc: Allen Myers, FCC