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February 11, 2000

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

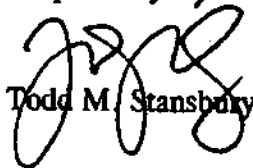
Re: WGGL(FM), Houghton, MI  
Facility No. 42913  
Minnesota Public Radio  
Supplement to Request for Waiver of the Main Studio Rule

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 10, 2000

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Secretary  
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Re: WGGL(FM), Houghton, MI  
Facility No. 42913  
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 December 8, 1997, for a waiver of the main studio rule, 47 C.F.R. § 73.1125, to operate WGGL(FM), Houghton, Michigan, 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 Houghton 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 Houghton. This programming would be broadcast by MPR's station in Houghton, as well as by other stations in the MPR network. This staff person currently is based in Houghton.
2. Continuation of meaningful contact with Houghton 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 Houghton for broadcast by MPR, either regionally or throughout the MPR multi-station network. The reporter also would serve as a liaison between Houghton-area residents and MPR's programming management.
3. Continuation of an existing relationship with the community of Houghton by means of membership in the MPR organization. MPR actively solicits comments from its members, including members in the Houghton service area, concerning programming and station operations and ensures that member requests and recommendations are thoughtfully considered in making programming decisions affecting the Houghton 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 Houghton residents to comment on station operations.

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

6. 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 Houghton, 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.

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 Houghton. It is MPR policy that residents of each of its service areas, including the Houghton 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

Magalie Roman Salas

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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 Houghton station.

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

Respectfully submitted,



Mitzi T Gramling  
Associate General Counsel

cc: Allen Myers, FCC