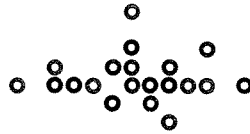


Stamp and Return



**MINNESOTA
PUBLIC RADIO®**

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July 25, 2008

BY HAND DELIVERY

FILED/ACCEPTED

JUL 28 2008

Federal Communications Commission
Office of the Secretary

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

**Re: Amendment to Request for Waiver of Section 73.1125
KBXO (FM), Coachella, California (Facility ID no. 85911)**

Dear Ms Dortch:

On June 11, 2008, American Public Media Group filed the attached Request for Waiver of Section 73.1125 (the "Request"). This letter constitutes an amendment to the Request.

As stated in the Request, American Public Media Group ("APMG") proposes to operate KBXO as a noncommercial educational station to serve Coachella, California. By this Amendment to the Request, APMG seeks a non-satellite waiver of 47 CFR 73.1125 so that APMG may co-locate its studios with the studios of KPCC (FM) in Pasadena, California. Pasadena Area Community College District is the licensee of KPCC. APMG's subsidiary, Southern California Public Radio ("SCPR"), operates KPCC pursuant to a Public Service Operating Agreement between Pasadena Area Community College District and SCPR.

As a point of clarification, beginning on page 3 of the Request, APMG outlines how it will satisfy the public needs and interests of the residents of Coachella. While the Request in some places discusses the "Coachella Valley," the intent of the Request is to explain to the Commission how we will serve the needs and interests of the community of Coachella, California. The "Coachella Valley" encompasses the city of Coachella and all of the efforts described in the Request relate to the community of Coachella.

In addition, staff has asked for some economic data as to why a grant of a main studio rule waiver makes economic sense in this case.

The current licensee of KBXO has a main studio rule waiver and rebroadcasts an Oklahoma Christian radio station. APMG intends to rebroadcast KPCC, a Pasadena all-news station that covers all of LA and is physically far closer to Coachella than Oklahoma. We believe that the residents of Coachella will very interested in the regional news coverage that KPCC carries about the entire Southern California region, and the listeners of KPCC will be interested in the extended Coachella coverage that we intend to carry on KPCC once APMG owns KBXO.

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If APMG/SCPR were required to set up and maintain a main studio in Coachella, the original investment required for the start-up and operations for the first year of the office/studio would be about \$480,000, with annual operating expenses of about \$125,000 thereafter. This includes finding office/studio space, building out studio space (while it is possible, it is unlikely that we would find rental space that already had studio equipment in it), installing additional T-1 lines, and buying office/studio equipment, furniture, utilities, office supplies and insurance. In addition, we would have the personnel costs involved with hiring two individuals to work full-time in the Coachella studios. Depending on the exact job descriptions of those two individuals, the annual personnel expense would be about \$162,000 per year, including benefits, with a start-up cost of about \$125,000.

SCPR currently operates KPCC from fairly small broadcast studios on the campus of Pasadena Community College, the licensee of KPCC. SCPR owns a building in Pasadena that currently is uninhabitable, but in the next few months SCPR will begin a complete remodel of the building to create a modern and comprehensive Broadcast Center. With the new Broadcast Center, SCPR will be in a better position than ever to provide excellent broadcast services to Southern California, including Coachella.

If a main studio waiver is granted, the funds that would otherwise have to be put into creating and maintaining a main studio in Coachella will be used for a variety of purposes that will help us provide better service to the residents of Coachella. For example, we would like to upgrade the KBXO transmitter to HD, thus improving the broadcast quality of KBXO and providing the residents of Coachella with the potential for multi-channel services. We can also put these funds into expanding our news reporting to cover local and regional issues important to Coachella listeners. We hope from time to time to remotely broadcast our talk shows covering important issues from Coachella.

As noted in the Request, the population of Coachella is 22,724 according to the 2000 Census. Coachella on its own cannot sufficiently support the economic base necessary to build and maintain the kind of full-time professional public radio service APMG proposes for Coachella.

For the foregoing reasons, APMG submits that it will be able to ascertain and satisfy the interests and needs of residents of Coachella and, therefore, respectfully requests that the Commission grant this waiver of the main studio rule for KBXO.

Sincerely,



Mitzi I Gramling
Associate General Counsel
American Public Media Group
Southern California Public Radio