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July 10, 2014

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JUL 10 2014

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

Federal Communications Commission
Office of the Secretary

**Re: Amendment to Request for Waiver of Section 73.1125
KLFH (FM), Ojai, California (Facility ID no. 60140)
File No. BALED-20140507ACM**

Dear Ms Dortch:

In its original application for consent to assign the license for KLFH (FM), Ojai, CA (Fac No 60140), from Logos Broadcasting Corporation to Southern California Public Radio ("SCPR") SCPR submitted a Request for Waiver of the Commission's main studio rules, Section 73.1125 (the "Request"). This letter constitutes an amendment to the Request.

As stated in the Request, SCPR proposes to operate KLFH as a noncommercial educational station to serve Ojai, California. By this Amendment to the Request, SCPR seeks a "non-satellite" waiver of 47 CFR 73.1125 so that SCPR may co-locate the KLFH studios with the studios of KPCC (FM) in Pasadena, California. Pasadena Area Community College District is the licensee of KPCC. SCPR provides programming and other operational support to KPCC pursuant to a Public Service Operating Agreement between Pasadena Area Community College District and SCPR.

The current licensee of KLFH has a main studio rule waiver. SCPR intends to rebroadcast programming carried on KPCC, a Pasadena all-news station that covers the greater LA area. SCPR believes that the residents of Ojai will be 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 Ojai coverage that SCPR intends to carry on KPCC once SCPR acquires KLFH.

If SCPR were required to establish and maintain a main studio in Ojai, the original investment required for the start-up and operations for the first year of the office/studio would be about \$500,000, with annual operating expenses of about \$150,000 thereafter. This includes finding office/studio space, building out studio space (while it is possible, it is unlikely that SCPR would find rental space that already had studio equipment in it), installing additional T-1 lines, and

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KPCC 89.3 KUDR 89.1 KPCC 90.3

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buying office/studio equipment, furniture, utilities, office supplies and insurance. In addition, SCPR would have the personnel costs involved with hiring two individuals to work full-time in the Ojai studios. Depending on the exact job descriptions of those two individuals, the annual personnel expense would be about \$175,000 per year, including benefits, with a start-up cost of about \$125,000.


SCPR currently delivers programming to KPCC from studio in an SCPR owned building in Pasadena. The SCPR Broadcast Center is a modern and comprehensive Broadcast Center that puts SCPR in a great position to provide excellent broadcast services to Southern California, including Ojai.

If a main studio waiver is granted, the funds that would otherwise have to be put into creating and maintaining a main studio in Ojai will be used for a variety of purposes that will help SCPR provide better service to the residents of Ojai. SCPR can put these funds into technical improvements of KLFH. SCPR can also put these funds into expanding its news reporting to cover local and regional issues important to Ojai listeners. SCPR also hopes from time to time to remotely broadcast its talk shows covering important issues from Ojai.

As noted in the Request, the population of Ojai is 7461 according to the 2010 US Census. Ojai on its own cannot sufficiently support the economic base necessary to build and maintain the kind of full-time professional public radio service SCPR proposes for Ojai.

For the foregoing reasons, and considering the efforts that SCPR will make to connect and interact with Ojai listeners as detailed in the original Request, SCPR submits that it will be able to ascertain and satisfy the interests and needs of residents of Ojai. Therefore, SCPR respectfully requests that the Commission grant this waiver of the main studio rule for KLFH.

Sincerely,



Mitzi T Gramling
Associate General Counsel
Southern California Public Radio