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44-171-413-0011  
FACSIMILE 44-171-413-0333

December 4, 1998

VIA HAND DELIVERY

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

**RECEIVED**

DEC - 4 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Docket No. 98-93

Dear Ms. Salas:

Enclosed for filing with the Commission in connection with the above-referenced proceeding are an original and six copies of the "Reply Comments of Northeastern University."

Should there be any questions regarding this matter, please communicate with this office.

Respectfully submitted,



William D. Wallace

Enclosures

cc: Dale Bickel  
Peter Doyle

No. of Copies rec'd OTG  
List ABCDE

Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

**RECEIVED**

DEC - 4 1998

In the Matter of )  
)  
1998 Biennial Regulatory Review -- ) MM Docket No. 98-93  
Streamlining of Radio Technical )  
Rules in Parts 73 and 74 of )  
The Commission's Rules )  
\_\_\_\_\_ )

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**REPLY COMMENTS OF NORTHEASTERN UNIVERSITY**

Pursuant to Section 1.415 of the Commission's Rules, Northeastern University hereby submits its reply comments on the proposals regarding Class D noncommercial, educational FM stations in the "Notice of Proposed Rule Making" in the above-referenced docket.<sup>1</sup>

In its initial comments, Northeastern expressed concern that the Commission's proposal to require Class D stations to protect larger coverage contours for Class B and Class B1 stations would force Northeastern to cease operation of its existing Class D noncommercial, educational FM station: WRBB, Boston (Channel 285, 104.9 FM).<sup>2</sup> Under the existing requirement that Class D

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<sup>1</sup> See Notice of Proposed Rule Making and Order, FCC 98-117 (released June 15, 1998) ("NPRM"). The time for filing reply comments was extended to December 4, 1998, by Order, DA 98-2302 (released Nov. 13, 1998).

<sup>2</sup> See NPRM, ¶ 67 (proposing to modify 47 C.F.R. § 73.509(b) to require Class D stations to protect Class B and Class B1 stations to their 0.5 mV/m (54 dBu) and 0.7 mV/m (57 dBu) contours, respectively).

stations protect the 1 mV/m (60 dBu) contour of all other broadcast stations,<sup>3</sup> WRBB avoids prohibited contour overlap with first-adjacent channel WWLI, Providence, a Class B station. However, because the WRBB transmitter is well within WWLI's predicted 54 dBu F(50,50) contour, it would be impossible for WRBB to meet the more stringent requirement of the proposed rule.

Very few specific comments were submitted on the Commission's proposed Class D contour protection standards. Two commenters supported the Commission's proposed changes on purely engineering grounds.<sup>4</sup> But none advocated just shutting down Class D stations that cannot meet the new coverage contour. The National Association of Broadcasters ("NAB") supported finding ways for existing Class D stations to improve their facilities so as to continue operation.<sup>5</sup>

Protecting current Class D stations from the adverse effects of this proposal is the right result. The Commission's proposed rule could silence diverse and valued broadcast voices. It is, therefore, obvious that the theoretical benefits of the proposed rule do not outweigh the educational value and public interest services performed by Class D stations such as WRBB.

WRBB, for example, is a true educational station, managed by a seven-member student board.<sup>6</sup> Professor Nicholas Daniloff, Director of Northeastern's

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<sup>3</sup> See 47 C.F.R. § 73.509(b).

<sup>4</sup> See Comments of Du Treil, Lundin & Rackley, Inc., at 6; Comments of Mullaney Engineering, Inc., at 9.

<sup>5</sup> See Comments of NAB, at 35.

<sup>6</sup> See Letter from Luca A. Amara, WRBB General Manager, to FCC ("Amara Letter"), Attachment A.

School of Journalism, believes that any disruption in WRBB's operation would seriously harm Northeastern's educational mission.<sup>7</sup> Specifically, Professor Daniloff explains that WRBB provides hands-on practice and real-life experience that cannot be duplicated in any other way;<sup>8</sup> an off-campus internship, for example, would never expose students to the breadth and depth of management responsibilities that WRBB demands of them.

WRBB also provides a working classroom to more than 550 students in Northeastern's Communications Studies and Journalism courses, enabling the University to offer coursework in radio newsgathering, station management, programming, on-air activity, and other broadcast station functions.<sup>9</sup> Richard A. Katula, Chair of Northeastern's Department of Communications Studies, states that forcing WRBB off the air would be "disastrous" to this curriculum and would seriously damage student recruitment efforts.<sup>10</sup>

WRBB also, of course, provides the Northeastern community with music, news and arts programming.<sup>11</sup> But WRBB's programming reaches and affects an audience far beyond the campus. For example, WRBB's new "college issues" show, *Sex, Drugs and Rock 'n' Roll*, has been on the air for only three months but is

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<sup>7</sup> See Letter from Nicholas Daniloff, Director, School of Journalism ("Daniloff Letter"), Attachment B.

<sup>8</sup> See id.

<sup>9</sup> See id.

<sup>10</sup> See Memorandum from Richard A. Katula, Chair, Department of Communication Studies, to Gail Olyha ("Katula Memorandum"), Attachment C.

<sup>11</sup> See Amara Letter, Attachment A.

already syndicated in 25 markets across the country.<sup>12</sup> *Sex, Drugs and Rock 'n' Roll* airs every Friday and examines issues in college life; past broadcasts have covered binge drinking, illegal drug use, and date rape.<sup>13</sup>

WRBB also serves the Boston communities of Back Bay, Roxbury, Jamaica Plain, Dorchester, and Fenway.<sup>14</sup> WRBB both directs programming at these diverse, historically underserved communities and offers community members the opportunity to participate in the station's operation. WRBB devotes three hours of airtime each week to programs that are produced, run, and hosted exclusively by community members.<sup>15</sup> Two of these hours are devoted specifically to programming directed at religious (Muslim) and ethnic (African-American) communities, while the third is a public affairs program hosted by a longtime community activist.<sup>16</sup> At this time, sixteen non-student community members are directly involved in the production of WRBB's community-oriented programming.<sup>17</sup>

In short, WRBB serves the public interest by providing a "voice" for and of Northeastern, by providing countless educational opportunities to students and to community members, and by providing service to otherwise underserved communities near its campus. To preserve these services, Northeastern urges the

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<sup>12</sup> See Memorandum from Adam Chapman to Gerry Herman ("Chapman Memorandum"), Attachment D.

<sup>13</sup> See id.

<sup>14</sup> See Amara Letter, Attachment A.

<sup>15</sup> See id.; Chapman Memorandum, Attachment D.

<sup>16</sup> See Chapman Memorandum, Attachment D.

<sup>17</sup> See id.

Commission not to change the contour protection requirements in Section 73.509(b) affecting currently authorized Class D stations. If the Commission does modify contour standard as proposed in the NPRM, Northeastern submits that there are substantial public interest reasons for applying the new rule prospectively only, as set forth in Northeastern's initial comments in this proceeding. Accordingly, if the proposed rule is adopted, all existing Class D stations should be grandfathered to the extent that their existing facilities do not comply with the modified contour protection requirements.

Respectfully submitted,

NORTHEASTERN UNIVERSITY

By:   
William D. Wallace

CROWELL & MORING LLP  
1001 Pennsylvania Avenue, N.W.  
Washington, DC 20004  
(202) 624-2500

Its Attorneys

Date: December 4, 1998

# ATTACHMENT

A



Station Manager 373-4379  
Office 373-4338  
Request Line 373-2658

November 6, 1998

Federal Communications Commission,

WRBB Radio in Boston is a student run, student group. As a class D, non-commercial station, our primary purpose is to serve the Northeastern and surrounding communities as a training and practice facility. Several of our alumni have gone on to earn excellent positions and great respect in the fields of music industry, radio production and journalism.

Run by a seven student executive board, WRBB gives students the opportunity to work in any aspect of what is otherwise a professional radio station. WRBB gets students from all different studies: music industry, communication, journalism, criminal justice, political science, business, engineering, pharmacy, and pre-med/biology. Students go through a process of volunteering hours in each of the seven departments. Upon completion of this period, the student is designated as a "full member" as defined by WRBB's constitution. Full members earn the right to vote in a democratic election, and after fulfilling a predetermined amount of time at WRBB, are allowed to run in the elections for any position. WRBB not only exposes and offers networking possibilities for students but gives students looking for management experience a setting to practice and develop necessary skills which are highly regarded and appreciated by would-be employers.

The seven departments are led by the business manager, news director, sports director, music director, engineering manager, program director, and general manager. (Please refer to the WRBB constitution for a description and responsibilities of each position.) All students attending Northeastern's undergraduate program are eligible to membership and all defined privileges.

In addition to providing the facility, management, and ambiance of a professional radio station, WRBB works in close collaboration with the Communication and Journalism departments of Northeastern. Presently there is a radio production class taught on the premises, and several other classes use the facilities for production projects. WRBB has been used for such classes as *Mass Communication*, *Broadcast Management*, *Broadcast Technologies*, *Radio Production*, and *Radio Newsgathering*.

Northeastern University  
360 Huntington Avenue  
Boston, MA 02115

Although we have a limited range of broadcast, the music industry as a whole has a great deal of respect for WRBB. We have earned servicing from every major record label, in every genre of music, which we broadcast. Independent labels often send our music directors test pressings, or cuts and ask for feedback about single releases. In turn we participate in national conferences –including CMJ, Gavin and the Winter Music Conference – which allow us to establish further contacts so while our wattage may remain the same, the radio station continues to grow.

We have always had open door for the community to join our organization. Approximately forty percent of WRBB's programming is produced by community members. On Sunday, the format allows three community oriented talk shows – covering three straight hours – produced and run exclusively by community members. WRBB serves Boston's Back Bay, Dorchester, Roxbury, Jamaica Plain, and Fenway area.

The contacts an interested person can make through WRBB are potential employers. With the reputation WRBB has developed over the last twenty-five years, it would be a great loss for many future students should anything happen forcing WRBB to be removed from Boston area airwaves.

Thank you kindly for your time and attention,  
Sincerely,

A handwritten signature in black ink that reads "Luca A. Amara". The signature is fluid and cursive, with the first name "Luca" being the most prominent part.

Luca A. Amara  
WRBB General Manager  
Senior, Communication Studies

ATTACHMENT

B

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School of Journalism

November 4, 1998

To Whom It May Concern

I write out of concern for the future of WRBB, the student radio station of Northeastern University.

WRBB is a student-run station whose signal is heard throughout the Northeastern University campus. It is an extremely important facility in our Journalism and the Communications Studies programs for these reasons:

(1) Its equipment is used by both the Journalism and Communication Studies Departments to instruct students in radio news gathering, station management, radio entertainment and other functions critical to the radio industry. Recently we have acquired a new control board at some considerable expense and have plans for further upgrades as required. Any disruption in the operations of WRBB will be to the detriment of our educational mission.

(2) WRBB gives students a chance to develop hands-on practice in radio broadcasting. Students who work in the station gain real-life experience which enhance their technical skills. This type of experience cannot be duplicated by internships and co-op positions because these off-campus positions rarely, if ever, provide for management responsibilities. However, because of their WRBB work, our students are particularly well qualified to enter into professional radio.

As you can see, I am deeply concerned about the future of WRBB. I implore the members of the FCC and other officials in authority not to disturb its operations. I will be pleased to answer further questions and may be reached at (617) 373-3238 or at [ndanilof@lynx.dac.neu.edu](mailto:ndanilof@lynx.dac.neu.edu).

Sincerely,

  
Nicholas Daniloff, Director  
School of Journalism

ATTACHMENT

C

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DEPARTMENT OF COMMUNICATION STUDIES

Northeastern University, 101 Lake Hall, Boston, MA 02115

617.373.5517 fax 617.373.8533

October 22, 1998

To: Gail Olyha  
Associate Dean and Director  
Curry Student Center

From: Richard A. Katula, Chair *Richard A. Katula*  
Department of Communication Studies

Re: Radio Station

It has come to my attention that our radio station may be in some jeopardy of losing its license to broadcast. Such an occurrence would have a dramatically negative effect on our curriculum.

We use the Radio Station facility every quarter to train students in radio production techniques. In fact, every major in this Department (approximately 550 students as of this writing) is required to take either a radio production course or a television production course, or both. We also teach a course in programming for radio and television, which requires students to use the radio station facility for projects. I have enclosed a sample syllabus for the course in radio production to give you some idea of the centrality of the studio for teaching that course.

Many of our students take our production course and then get practical training in radio at the station. Two of our majors, for instance, are presently serving as Manager and Assistant Manager of the station. Experiences both on-air and in management provide our students with the experiences they need to qualify for careers in the radio industry. We have no other way to give them such experiences since internships and cooperative education placements would never lead to on-air or actual management responsibilities.

The effect of any rulings that would take us off the air would be disastrous to this curriculum and would have a serious effect on our ability to recruit students to our program and the University. I am very concerned about this situation. We worked very hard last year to attract external support for the purchase of a new control board, and now these efforts, in addition to our entire curriculum, appear to be in jeopardy. Please let me know whether there is anything else I can do to support your efforts to retain WRBB as an educational broadcasting facility.

**NORTHEASTERN UNIVERSITY**  
**Department of Communication Studies**  
**CMN 1452: Radio Production, Fall 1998**

Instructor: Terry Beadle  
01 Dockser Hall  
Office Tel: 373-2466  
Email: t.beadle@NUnet.neu.edu

Office Hours: Friday, 12:00 p.m. - 1:00 p.m.  
or by appointment Mon.-Thur., 8:30 a.m. - 4:00 p.m.

Text: *Modern Radio Production*, 4<sup>th</sup> Edition, O'Donnell, Benoit, Hausman

Lab Materials:

- One 5-inch or 7-inch reel of ¼-inch wide audio tape
- One grease pencil
- One audio tape splicing block with single-edged razor blade
- One or two sixty- or ninety-minute audio cassette(s)
- Headphones. (Personal headphones [Walkman type] are okay. You'll also need a ¼" adapter if your headphones have a miniplug.)
- Seventy-second audio carts (will be provided and must be returned at the end of the quarter)

Class meets Friday mornings from 9:00 to Noon. Production work and labs will be completed in WRBB Radio's production studio B. Classes will be held in both locations, but unless instructed otherwise, class will always begin in the classroom in 1 Snell Library. You will be required to complete some production assignments at WRBB at times outside of class.

Course Description and Objectives

Radio Production is a lecture/laboratory course designed to introduce the student to the terminology and basic procedures used in radio production. Students will be instructed in the use of radio production equipment and the techniques used in producing various types of radio programming.

At the conclusion of this course, the student should be able to:

- 1) operate audio production equipment, including a console, compact disk, turntable, cart and reel-to-reel tape machines with sufficient proficiency to produce radio programming materials;
- 2) edit audio tape for production of commercials, news interviews, etc.;
- 3) define various terms used in radio production;
- 4) demonstrate a knowledge of radio programming, station organization and industry practices;
- 5) compose commercial, promotional and news scripts suitable for radio production.

To help meet these objectives, we will employ class lectures and discussions, textbook readings, studio demonstrations, handouts, and production projects.

## Attendance and Assignments

Attendance will be taken at the beginning of each class and participation is vital. Much of what you learn will be by doing. If you do not show up you will miss valuable hands on experience. Any student who misses more than one class will drop a full letter grade. Approach this class as you would a job. Station managers expect their production staff to be on time, and I expect you to be on time and to participate. Everyone starts off with an A for participation. But, if you do not attend class regularly, are not punctual, or do not participate in discussions and lab exercises, your class participation grade will be lowered. Assignments are to be turned in at the beginning of class on the dates due.

## Grading

7 Lab Assignments @ 5 points each	- 35 points
Mock Air Shift Group Project	- 15 points
Midterm Exam	- 20 points
Final Exam	- 20 points
Class Participation	- 10 points
<b>Total Points</b>	<b>- 100</b>

Scale:	91 - 100 = A
	88 - 90 = B+
	81 - 87 = B
	78 - 80 = C+
	70 - 77 = C
	60 - 69 = D
	59 and below = F

## Class Schedule

- Sept. 25      Course Introduction  
Lecture & Discussion: Principles of Sound and Audio - How Radio Works; The Radio Console.  
Lab: WRBB Orientation
- Oct. 2        Lecture & Discussion: Turntables and <sup>CDs</sup> ~~CDSs~~;  
Lab: Individual checkouts on the console, turntable and CD.  
**(Read Chapters 2 and 3)**
- Oct. 9        Lecture & Discussion: Tape Recorders, Microphones, Splicing and Dubbing  
Lab: Intro. to reel-to-reel recorder, tape splicing, dubbing.  
**(Read Chapters 4, 5 and 6)**
- Oct. 16       Lecture & Discussion: Recorded and Live Production  
Lab: Mixing live and recorded sources.  
**(Read Chapters 7 and 8)**
- Oct. 23       Lecture & Discussion: Commercials, PSAs, News and Sports  
Lab: Creating a spot.  
**(Read Chapters 9, 11, 12 and 13)**
- Oct. 30       Midterm Exam  
Lecture & Discussion: The History of Radio Broadcasting
- Nov. 6        Lecture & Discussion: The Modern Radio Station: Formats, Station Organization, Station Operations, Ratings  
Lab: (tba)  
**(Read Chapters 1 and 16)**
- Nov. 13       Lecture & Discussion: (tba)
- Nov. 20       Group assignments and group meetings for mock air shifts  
Field Trip
- Nov. 27       [ Thanksgiving Recess - No Class ]
- Dec. 4        Lab: Mock On-Air Shifts (Group Exercises)

ATTACHMENT

D

TO: Gerry Herman  
FROM: Adam Chapman, WRBB  
RE: Public Service Programming  
DATE: October 19, 1998

The following is a list, complete with brief programming descriptions, of WRBB's Public Service and Community-Based Programming. Any questions or comments can be directed to Adam Chapman, Program Director, at 617-373-8400.

**WRBB News**

WRBB News broadcasts a total of six times a day covering local, national, world, and sports news. Also, weather and special assignments that students research and report themselves. Special assignments range from the latest computer products to the newest lifestyle trends.

WRBB News is heard ten minutes to the top of the hour during the morning shows noon and 5 P.M. every weekday.

**Sex and Drugs and Rock n' Roll**

WRBB began a new show in August called Sex, Drugs and Rock n' Roll which is nationally syndicated in 25 locations across the country. This is a college issues show that touches on topics such as binge drinking, pot smoking, and date rape. It airs from 8-9 P.M. on Friday nights. Jill Leavens and Chris Lobono are the hosts, and the executive producer is Michael Galer.

**Final Call**

Final Call is a program featuring the message of the Minister Louis Farrakhan and the Nation of Islam. The program airs on Sunday mornings, from 9-10 A.M. and is hosted by Minister Rodney Muhammad.

**Drum Beat**

Drum Beat is a community service program sponsored by the Black Community Information Center of Greater Boston. The program is dedicated to providing news, community affairs and commentary, and interviews with key people in the Black and minority communities of greater Boston, keeping them informed, educated, and entertained.

Drum Beat is co-hosted by Mr. Nathan Cooper, president of the Codman Square Neighborhood Council and by Ahmad Mubarak Abdulbad, Board of Directors member of the Black Community Information Center. The show airs Sunday 10-11 A.M.

**Family Tree**

Family Tree is a public affairs program which deals with issues in and around the communities of Boston and Roxbury. Family Tree is hosted by long-time community member Nina Ruff and airs Sundays from 11 A.M.- 12 P.M.

## List of WRBB Community Member Programming

<u>Weekday</u>	<u>Format</u>	<u>Name</u>	<u>Phone Number</u>	<u>Time Slot:</u>	<u>Notes:</u>
Monday	Urban Music	Mike Reed	888-631-8857	10pm-12	
Tuesday	Reggae	Bobby Lawson	617-296-0425	10am-12	'89
Wednesday	Urban Music	Reggie Beasley	401-453-2176	8pm-10	grad
Friday	Specialty	Mike Epstein	373-1955	5pm-6	grad
Saturday	Gospel	Norris Jones	617-763-6068	6am-9	
Saturday	Jazz	John Vines	617-442-8792	9am-12	'86
Saturday	Urban Music	Adam DeFalco	781-677-3836	12pm-3	
Sunday	Old School	Hollis Crichlow	617-288-1366	12am-4	grad,RBB
Sunday	Gospel	Donald Smith	617-442-1685	6am-9	
Sunday	Nation of Islam	Minister Rodney Muhammed	617-541-6908	9am-10	
Sunday	DrumBeat/Community	Nathan Cooper	617-445-3098	10am-11	
Sunday	Family/Community	Nina Ruff	617-427-1940	11am-12	
Sunday	Reggae	Josh Blood	781-762-9755	12pm-3	
Sunday	Urban Music	Braun Duggan	617-695-2856	6pm-8	
Sunday	Urban Music	Cheryl Locksley	617-247-2180	8pm-10	
Sunday	Urban Music	Mike Samuel	617-427-4293	10pm-12	
Monday	Urban Music	Ondre Clark	617-776-5849	12am-3	

# **WIRIBIB** *Programming Guide*

## *Weekdays...*

<b>6-10 a.m.</b>	<b>"Morning Show"</b>	<b>Urban mix</b>
<b>10-12 p.m.</b>	<b>"Level Groove"</b>	<b>Urban/Reggae</b>
<b>12-3 p.m.</b>	<b>"Rock Recess"</b>	<b>College Rock</b>
<b>3-5 p.m.</b>	<b>"Total Spectrum"</b>	<b>Open Format</b>
<b>5-6 p.m.</b>	<b>"Specialty Show"</b>	<b>Specialty/Talk</b>
<b>6-8 p.m.</b>	<b>"Radio Bliss"</b>	<b>College Rock</b>
<b>8-10 p.m.</b>	<b>"Soul's Place I"</b>	<b>Urban</b>
<b>10-12 p.m.</b>	<b>"Soul's Place II"</b>	<b>Urban</b>
<b>12-3 a.m.</b>	<b>"Drug-Free Zone"</b>	<b>Open Format</b>
<b>3-6 a.m.</b>	<b>"Night Aura"</b>	<b>Open Format</b>

## *Request Line:*

**373-2658**

*Weekends...*

<b>Sat. 6-9 a.m.</b>	<b>"Gospel Connection"</b>	<b>Gospel</b>
<b>Sat. 9-12 p.m.</b>	<b>"Jazz Circle"</b>	<b>Jazz</b>
<b>Sat. 12-3 p.m.</b>	<b>"Master Jam"</b>	<b>Urban/Hip-Hop</b>
<b>Sat. 3-6 p.m.</b>	<b>"Skanky Beats"</b>	<b>Ska</b>
<b>Sat. 6-8 p.m.</b>	<b>"Reggae Explosion"</b>	<b>Reggae</b>
<b>Sat. 8-10 p.m.</b>	<b>"Clubland"</b>	<b>House mix</b>
<b>Sat. 10-12 a.m.</b>	<b>"Crisis"</b>	<b>Urban/Hip-Hop</b>
<b>Sun. 12-4 a.m.</b>	<b>"Old School Zone"</b>	<b>Old School mix</b>
<b>Sun. 4-6 a.m.</b>	<b>"Night Aura"</b>	<b>Open Format</b>
<b>Sun. 6-9 a.m.</b>	<b>"Gospel Connection"</b>	<b>Gospel</b>
<b>Sun. 9-10 a.m.</b>	<b>"Final Call"</b>	<b>Talk</b>
<b>Sun. 10-11 a.m.</b>	<b>"Drum Beat"</b>	<b>Talk</b>
<b>Sun. 11-12 p.m.</b>	<b>"Family Tree"</b>	<b>Talk</b>
<b>Sun. 12-3 p.m.</b>	<b>"First Class"</b>	<b>Reggae</b>
<b>Sun. 3-6 p.m.</b>	<b>"H2H03"</b>	<b>College Rock</b>
<b>Sun. 6-8 p.m.</b>	<b>"Probe Lyrical"</b>	<b>Urban/Hip-Hop</b>
<b>Sun. 8-10 p.m.</b>	<b>"Soul's Place I"</b>	<b>Urban</b>
<b>Sun. 10-12 a.m.</b>	<b>"Soul's Place II"</b>	<b>Urban</b>
<b>Sun. 12-3 a.m.</b>	<b>"Groove Spot"</b>	<b>Urban</b>
<b>Sun. 3-6 a.m.</b>	<b>"Night Aura"</b>	<b>Open Format</b>

**WRBB Breakdown of Staff:**  
Students, Community Members

Total Slots Available:	70
Number of Slots Occupied:	66
Number of Slots Available:	04
Full-Time Students on roster:	38

**All following are categorized as community staff:**

Part-time and graduate students:	5
Community members holding shows:	16
Total non-full-time students:	21