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August 22, 2019

**VIA HAND DELIVERY & EMAIL**

Albert Shuldiner  
Chief, Audio Division, Media Bureau  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554  
albert.shuldiner@fcc.gov

Received-FCC

AUG 22 2019

Bureau / Office

**Re: Lighthouse Christian Center  
WLCQ-LP, Feeding Hills, Massachusetts (Facility ID No. 133854)  
Third Compliance Report (NAL/Account No. MB-201741410010;  
FRN 0010722700; File Nos. BLL-20061106AAA, BPL-20151102AHI,  
and BSTA-20151102AHI)**

Dear Mr. Shuldiner:

Lighthouse Christian Center (“Lighthouse,” or the “Company”), licensee of low power FM station WLCQ-LP, Feeding Hills, Massachusetts (Facility ID No. 133854) (the “Station”), by its undersigned counsel, hereby files this Third Compliance Report pursuant to the Consent Decree (DA 17-720) adopted on August 23, 2017 and released on August 24, 2017 in the above-referenced proceeding. Capitalized terms used herein have the same meaning as they have been given in the Consent Decree. Lighthouse’s efforts to comply with the terms and conditions of the Consent Decree are set forth below.

1. **Civil Penalty** – As previously reported, on August 28, 2017, i.e., within thirty (30) calendar days after the Effective Date of the Consent Decree, Lighthouse paid to the U.S. Treasury the civil penalty specified (\$8,800.00). On the date of payment, Lighthouse notified Heather Dixon of the Audio Division via email of the payment. Accordingly, Lighthouse’s financial responsibilities, obligations, and liabilities under paragraph 12 of the Consent Decree have been satisfied.

2. **Compliance Officer** – On September 21, 2017, i.e., within thirty (30) calendar days after the Effective Date, Lighthouse designated Nate Thomas, a management-level employee, to serve as its Compliance Officer, and to discharge the duties set forth in the Consent Decree. Mr. Thomas continues to serve as the Compliance Officer.
3. **Consultation with FCC Regulatory Counsel** – As Lighthouse’s Compliance Officer is neither FCC regulatory counsel nor in-house counsel, within sixty (60) calendar days after the Effective Date, Lighthouse consulted with Matt McCormick of Fletcher, Heald & Hildreth, PLC, Lighthouse’s outside FCC regulatory counsel, regarding the Company’s overall compliance with the Underwriting Laws. Such consultations have continued and will continue to occur on an as-needed basis – not less than biannually. On occasion in the last year, Mr. Thomas in his role as Compliance Officer has conferred with Mr. McCormick to verify whether the scripts for certain proposed underwriting announcements comport with the Underwriting Laws.
4. **Operating Procedures** – Within sixty (60) calendar days after the Effective Date, Lighthouse established standard, internal operating procedures and compliance policies (“Operating Procedures”) that all Company employees and agents performing, supervising, overseeing, or managing the performance of duties related to Lighthouse’s responsibilities under the Communications Laws, including the Underwriting Laws (the “Covered Employees”), must follow to help ensure Lighthouse’s compliance with the Communications Laws, including the Underwriting Laws. Lighthouse’s Operating Procedures include internal procedures and policies specifically designed to ensure that the Company complies with the Underwriting Laws. The Compliance Officer reviews all scripts of underwriting announcements prior to broadcast. In the event the Compliance Officer has questions as to whether a particular script complies with the Underwriting Laws, he confers with Lighthouse’s FCC regulatory counsel. Lighthouse has developed an Underwriting Compliance Checklist that describes the steps that a Covered Employee must follow to ensure that all material approved for broadcast is consistent with relevant past Commission precedent regarding the Underwriting Laws.
5. **Compliance Manual** – Lighthouse, through its FCC regulatory counsel, has developed a Compliance Manual, which has been distributed to all Covered Employees. The Compliance Manual explains the Underwriting Laws in detail.

6. **Compliance Training Program** – Lighthouse has established and implemented a Compliance Training Program with respect to the Underwriting Laws and the Operating Procedures. As part of the Compliance Training Program, Lighthouse has advised Covered Employees of the Company’s obligation to report any noncompliance with the Underwriting Laws under paragraph 8 of the Compliance Plan set forth at the Appendix to the Consent Decree, and has instructed Covered Employees on how to disclose noncompliance to the Compliance Officer. In an hour-long training session conducted by Lighthouse’s undersigned FCC regulatory counsel on November 15, 2017, all current Covered Employees were trained regarding compliance with Underwriting Laws. The training session was recorded and any person who becomes a Covered Employee will review the training session within thirty (30) calendar days after being hired. Lighthouse will conduct compliance training on an annual basis, and shall periodically review and revise the Compliance Training Program as necessary to ensure that it remains current and complete and to enhance its effectiveness.
  
7. **Communications with Prospective Clients** – Lighthouse has implemented a policy whereby the Company will summarize the Underwriting Laws for each prospective client before accepting any contract with a prospective client to air underwriting announcements over the Station, and will prepare the underwriting announcement for the underwriter’s review. Lighthouse’s Compliance Officer will continue to review all underwriting announcements before they air. Lighthouse has implemented a policy whereby the Company will not broadcast over the Station of any announcement that does not comply with the Underwriting Laws.
  
8. **Reporting Noncompliance** – Under the Consent Decree, Lighthouse has been obligated to report any noncompliance with the Underwriting Laws and with the terms and conditions of the Compliance Plan within thirty (30) calendar days after discovery of such noncompliance. Any such report would include a detailed explanation of: (i) each instance of noncompliance; (ii) the steps that the Company’s has taken or will take to remedy such noncompliance; (iii) the schedule on which such remedial actions will be taken; and (iv) the steps that Lighthouse has taken or will take to prevent the recurrence of any such noncompliance. Any such report would be submitted to the Chief of the Audio Division. Since the Effective Date, no occasion has arisen that would require the submission of such a report.

Attached is Compliance Officer's certification with respect to this Third Compliance Report. Should any questions concerning this Compliance Report arise, please contact the undersigned counsel for Lighthouse.

Respectfully submitted,



Matthew H. McCormick  
Keenan P. Adamchak

*Counsel for Lighthouse Christian Center*

Enclosure

cc: Heather Dixon ([heather.dixon@fcc.gov](mailto:heather.dixon@fcc.gov))

**LIGHTHOUSE CHRISTIAN CENTER**

**COMPLIANCE OFFICER CERTIFICATION**

I, Nate Thomas, the Compliance Officer for Lighthouse Christian Center ("Lighthouse"), have the requisite authority to execute this certification as an agent of and on behalf of Lighthouse.

I have personal knowledge of the statements set forth in Lighthouse's Third Compliance Report, agree that those statements are true and correct, and adopt those statements as my own and as the basis for this certification.

I have personal knowledge that Lighthouse: (i) has established and implemented the Compliance Plan; (ii) has utilized the Operating Procedures since the implementation of the Compliance Plan; and (iii) is not aware of any instances of noncompliance with the terms and conditions of the Consent Decree, including the reporting obligations set forth in paragraph 7 of the Compliance Plan, attached as an Appendix to the Consent Decree.

I certify under penalty of perjury that the foregoing is true and correct.

By:   
\_\_\_\_\_  
Nate Thomas  
Compliance Officer  
Lighthouse Christian Center

Executed on: 8/22/19  
\_\_\_\_\_  
(date)