

WCSU-FM (Fac ID 9958), Wilberforce, OH
Schedule 303-S, Application for License Renewal
Exhibit: Explanation of Response Regarding Online Public Inspection File (OPIF)

In response to the certification query concerning uploaded content and uploading dates for the OPIF of this NCE radio station, licensee Central State University (CSU) responded "No" and, in explanation of that response, files this Explanatory Exhibit. The reason for CSU's inability to certify full compliance with FCC Rule 73.3527 is due to the failure of former CSU staff members to convert existing paper Issues/Programs Lists (IP Lists) to electronic format and to upload the full set of those IP Lists in electronic format to the OPIF in a timely basis, as required, prior to the March 1, 2018 deadline.

Please be advised, as of the date of this renewal filing, of the following:

CSU certifies that the WCSU-FM electronic OPIF is now complete with respect to all required documents and filings, including all Issues/Programs Lists (IPLists) for all quarters since the prior license renewal in 2012. New WCSU management and new communications counsel have investigated the OPIF upload discrepancy and identified the following problems with maintenance of the OPIF during the previous license term:

- (1) Between the last quarter of 2012 and February 14, 2018, the WCSU-FM public file was maintained on paper, as was required by the Commission's former rules.
- (2) The WCSU-FM public file made the required transition to the internet OPIF on February 14, 2018.
- (3) When this electronic transition was made, however, not all of the paper content of the former Public Inspection File was uploaded at that time. Rather, the IPLists for 12 quarters (from the last quarter of 2012 through the last quarter of 2015) were inadvertently not uploaded to the OPIF electronic file. Also, the IP Lists that were uploaded in Feb 2018 were loaded as a group, rather than as individual quarters.
- (4) The quarterly Lists that were not individually uploaded in February 2018 continued to be maintained in the paper file until April, 2020 when the omission was discovered and corrected by new WCSU management and counsel.
- (5) When these errors were discovered in April, 2020, the full file of all IP Lists was reviewed and the appropriate paper content was scanned and uploaded individually, by quarter, in the OPIF section for IP Lists. For the years 2016 to 2018, some IP Lists had been completed but misfiled, and a few IP Lists had been completed by hand, so were somewhat difficult to decipher. New management transcribed those handwritten reports and then immediately uploaded all reports.
- (6) At this same time, missing electronic quarterly files from 2018 and 2019 were also completed and uploaded, including IP Lists for the first two quarters of 2020, Lists that are not due to be uploaded until July 10, 2020.

Central State University, the licensee, is designated as a Historically Black College or University (HBCU). In recent years, the licensee and the station have experienced financial challenges and funding shortages, while the station itself has suffered from inexperienced station staff and frequent station personnel turnover. In addition, the specific station employee responsible for public file maintenance of OPIF uploads became seriously ill in early 2019 and has been on continuous medical leave through the present month.

Central State University and the management of WCSU-FM acknowledge and sincerely regret the errors made by station staff in uploading the IP Lists to the WCSU OPIF. CSU management has now corrected all such filing and uploading errors and can certify that its OPIF is presently in compliance with FCC Rule 73.3627. CSU also commits to the Commission that it has taken and will continue to take specific concrete actions to avoid any such issues recurring in the future. A new and experienced General Manager was brought in by University officers and administration in January 2020 to manage the station effectively and bring it into regulatory compliance. Likewise, experienced FCC legal counsel has been retained to assist and guide CSU and station management with all regulatory compliance obligations related to the station and its obligations to serve the public interest. Legal counsel has provided extensive educational efforts and materials and is working closely with station management and licensee's in-house legal counsel. WCSU station management will meet with counsel at least quarterly to ensure timely and complete public file compliance. Likewise, station staff members and student interns, who are knowledgeable about and have expertise in online applications and information technology, have been and will be tasked with assisting management with the functional details of OPIF compliance.