

**WCBE-FM (Fac ID 4325), Columbus, 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 the Columbus Board of Education (CBE) responded "No" on this Schedule 303-S and, in explanation of that response, files this Explanatory Exhibit.

The reason for CBE's inability to certify full compliance with FCC Rule 73.3527 is due to the failure of former CBE staff members to upload four 2019 Issues/Programs Lists (IP Lists) in electronic format to the OPIF in a timely manner. Please be advised, as of the date of this renewal filing, of the following:

CBE certifies that the WCBE-FM electronic OPIF is now complete with respect to all required documents and filings, including all Issues/Programs Lists (IP Lists) for all quarters since the prior license renewal in 2012. New WCBE management has investigated the OPIF upload discrepancy for the 2019 IP Lists, and has identified the following problem with maintenance of the OPIF during the four quarters of 2019:

- (1) Between the last quarter of 2012 and March 1, 2018, the WCBE-FM public file was maintained on paper, as was required by the Commission's rules during that period;
- (2) WCBE's General Manager was educated in maintenance of the OPIF under the Commission's new rules and policies for NCE licensees in 2018, and successfully uploaded all formerly-paper WCBE-FM public files on or before March 1, 2018, thus successfully making the required transition to the FCC's internet-based OPIF on a timely basis for all quarters of through the 1st quarter of 2018. The remaining three quarters of 2018 were also uploaded on a timely basis.
- (3) WCBE experienced serious personnel problems in 2019, including the suspension, and eventual resignation, of its General Manager. During this period of difficulty, all four IP lists for 2019 were prepared on a timely basis but, inadvertently, not uploaded online on a timely basis. The paper versions of those four 2019 IP Lists were uploaded to the OPIF in May, 2020, following recognition by the new General Manager that his predecessors has failed to do so.
- (4) At the present time, as this license renewal application is filed, CBE and WCBE management certify that all IP Lists for all quarters of the October 1, 2012 to September 30, 2020 license term have been prepared on a timely basis and uploaded to the WCBE OPIF. WCBE's OPIF is presently in full compliance with Rule 73.3627.

The Columbus Board of Education, the licensee, has experienced financial challenges and funding shortages, as well as recent difficulties relating to turnover of station management. During 2019, four different persons served as WCBE-FM General Manager. It was during 2019, and only those four quarters, that the four IP Lists were not uploaded in a timely manner. The IP Lists for that year were, nevertheless, created on a timely basis as paper files.

The Columbus Board of Education and the management of WCBE-FM acknowledge and sincerely regret the four late-filed 2019 IP Lists to the WCBE OPIF. Working with legal counsel, CBE and WCBE station management have now corrected the error related to the 2019 IP lists and can certify

that WCBE's OPIF is presently in full compliance with FCC Rule 73.3627. CBE also commits to the Commission that it has taken, and will continue to take, specific concrete and Fail-Safe actions to avoid any such problems recurring in the future. A new and experienced General Manager was brought in by the CBE officers and administration in December 2019 to manage the station effectively and bring it into regulatory compliance. In addition, experienced FCC legal counsel is assisting and guiding CBE and station management with all regulatory compliance requirements 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 designated station-liaison officers. WCBE station management will also meet with counsel at least quarterly to ensure timely and complete public file compliance.