



Federal Communications Commission  
Washington, D.C. 20554

February 26, 2021

*In Reply Refer to: 1800B3-HOD*

**CERTIFIED MAIL-RETURN RECEIPT REQUESTED**

Mr. Shawn Craft  
The Marion Education Exchange  
1366 Montego Drive  
Marion, OH 43302

In re: **The Marion Education Exchange**  
WWGH-LP, Marion, Ohio  
Facility ID No. 193826  
File No. 0000115702

**Letter of Inquiry**

Dear Licensee:

This letter concerns a pleading submitted to the Commission by The Marion Education Exchange (MEE)—licensee of WWGH-LP, Marion, Ohio (Station)—on February 16, 2021. Among other things, the pleading appears to respond to a Letter of Inquiry (LOI) that we sent to MEE on December 8, 2020.<sup>1</sup> Accordingly, we have considered whether the pleading provided the information and materials requested in the LOI. As discussed below, while the pleading does include some of the requested information, it does not include all of it. Further, it does not contain any of the documentation requested in the LOI.

We hereby direct MEE to provide the missing information and documentation within fifteen (15) calendar days (*i.e.*, no later than **March 11, 2021**). Specifically, MEE must submit:

- A **narrative statement** identifying all individuals who have served as officers and directors of MEE since it was first incorporated. For each of these individuals, MEE must also state the position or positions the person held, and the dates on which the person held those positions.<sup>2</sup>
- Copies of all **corporate materials** (including those filed with the State of Ohio) that are related to or include information regarding MEE's Board composition, or the appointment, resignation, or termination of MEE officers or directors. If those materials vary in any respect from the narrative statement or any information previously provided to the Commission by MEE, MEE must explain the basis for the variation.

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<sup>1</sup> Letter from Albert Shuldiner, Chief, Audio Division, to Shawn Craft, Marion Education Exchange, File No. 0000115702 (dated Dec. 8, 2020).

<sup>2</sup> For example, if John Doe was an officer or director of MEE, the narrative statement would list his name and then identify the position that he held and when he held it (*i.e.*, Vice President from January 1, 2019, to December 31, 2020).

- An **affidavit or declaration** made under penalty of perjury, signed and dated by an authorized representative of MEE, with personal knowledge of the information and materials being submitted to the FCC. The affidavit or declaration must verify the truth and accuracy of the information provided to the FCC, and must state that all responsive information within MEE's possession, custody, control or knowledge has been provided to the FCC.<sup>3</sup>

We also direct MEE to provide additional information related to a statement made in an assignment application filed by it and Marion Midget Football on May 9, 2019.<sup>4</sup> Based on the information in MEE's February 16, 2021, pleading, it appears that the information provided in that application regarding MEE's Board composition was false. Accordingly, we direct MEE to submit a **narrative statement** explaining what basis it had for including the information.

We remind MEE that its response to the LOI should have been—but was not—served by email on FCC staff ([tom.hutton@fcc.gov](mailto:tom.hutton@fcc.gov) and [heather.dixon@fcc.gov](mailto:heather.dixon@fcc.gov)) and Mr. Spencer Phelps ([spencer.phelps@yahoo.com](mailto:spencer.phelps@yahoo.com)). We direct MEE to ensure that any additional responses to the LOI are submitted to the Office of the Secretary, Federal Communications Commission, 45 L Street, NE, Washington, DC 20554, and served by email to Tom Hutton, [tom.hutton@fcc.gov](mailto:tom.hutton@fcc.gov), Heather Dixon, [heather.dixon@fcc.gov](mailto:heather.dixon@fcc.gov), and Spencer Phelps [spencer.phelps@yahoo.com](mailto:spencer.phelps@yahoo.com). Because MEE's February 16, 2021, pleading was not served on Mr. Phelps and because we are requesting additional information related to the LOI, we conclude that Mr. Phelps shall have fifteen (15) calendar days from the date he is served by email with MEE's response to this letter.

Finally, please note that failure by MEE to respond (or failure to fully respond) within the time period specified may result in the dismissal of its application to renew the Station's license pursuant to Section 73.3568 of the Rules.<sup>5</sup> In addition, failure to respond (or failure to fully respond or failure to timely respond) to this request for information also may subject MEE to financial penalties.<sup>6</sup>

Sincerely,

*Albert Shuldiner*

Albert Shuldiner  
Chief, Audio Division  
Media Bureau

cc: Spencer Phelps, by email to [spencer.phelps@yahoo.com](mailto:spencer.phelps@yahoo.com)

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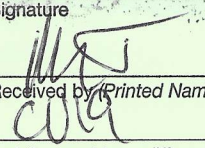
<sup>3</sup> Additional affidavits and declarations may be required if the authorized representative of MEE is relying on the personal knowledge of another individual, rather than his or her own knowledge. This is explained in greater detail in the LOI.

<sup>4</sup> File No. BALL-20190509AAH.

<sup>5</sup> 47 CFR § 73.3568.

<sup>6</sup> See 47 CFR § 1.80 (specifying a base forfeiture of \$4,000 for failure to respond to Commission communications).

Keith Coburn  
MARION EDUCATION

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