

KPRG(FM)(Facility ID 25515) Agana, Guam

Licensee: Guam Educational Radio Foundation

**License Renewal Application, Schedule 303-S
Certification Explanatory Exhibit: Untimely OPIF Uploads**

As of the date of this renewal filing, the KPRG(FM) electronic Online Public Inspection File (OPIF) is complete for all quarters since its prior license renewal in 2013. During the most recent license period, however, the following problems with the public file were identified.

Between 2013 and 2017, the KPRG-FM public inspection file was maintained on paper, as was required by the Commission's rules for NCE radio stations at that time. The transition to electronic public files on the Commission's OPIF pages took place on March 1, 2018, and was successful. As of that date all 16 quarterly files from 2014 through 2017 were loaded in a timely manner.

In 2018 the first quarterly file was timely but the remaining 3 quarters were late and not created and uploaded until 2/24/2019. In 2019, the first and fourth quarters were timely but the second and third quarter reports were not created and uploaded until 8/25/2021. All 2020 and 2021 quarterly reports were created and filed in a timely manner.

The late 2018 and 2019 quarterly reports resulted from the loss of the employee responsible for their preparation. When the 2018 oversight was discovered in 2019, the oversight was promptly remedied. The filing of the 2019 missing reports were delayed until 8/25/2021 because of the pandemic..

The Foundation and the management of KPRG-FM acknowledge and sincerely regret the public file errors described above and are taking concrete specific actions to prevent a recurrence of these problems in the future. Experienced FCC legal counsel will assist with FCC compliance obligations related to the KPRG-FM file. Legal counsel will be meeting with station management, at least quarterly, to ensure that station staff understands how to fulfill its OPIF obligations to achieve timely and complete public file compliance.