

JAN 21 2020

FCC Mailroom

Andrew Cook, SCHS Radio Mentor
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2020 JAN 21 AM 11:59

January 9, 2020

Albert Shuldiner, Chief, Audio Division, Media Bureau
Office of the Secretary, Federal Communications Commission
445 12th Street, Southwest
Washington, DC 20554

**RE: MEMORANDUM OPINION AND ORDER AND NOTICE OF APPARENT LIABILITY
FOR FORFEITURE**

**Facility ID No. 134206
NAL/Acct. No. MB-201941410011
FRN: 0029004629
File No. 0000091713**

Dear Mr. Shuldiner:

I have received a letter stating that we are liable for a monetary forfeiture in the amount \$1500.00 due to a failure to file a licensing renewal in a timely manner. We are humbly asking you to waive this fee because our station is an educational non-profit entity. The objective for having this station is so our students can learn about broadcasting and hone skills associated with the operations of a radio station. I am only a mentor who guides these young people in this process. Recently, I took over the radio station after our previous teacher retired. We received a letter from a business offering to help us renew our license as it was on a list of stations expiring in December. No one at our school knew that the radio station was due for renewal as the previous teacher did not update our FCC profile before he left. After receiving this letter in late November, I immediately took the actions necessary to renew online with the help of a kind soul at the FCC help line. He worked with me to establish new login account credentials and walked me through the renewal steps. He encouraged me to submit our application as soon as possible as we were already past the August renewal deadline. He told me our renewal should be okay as long as I got it in before the license expired.

I had no knowledge of the radio station's renewal process as I was not receiving the notices because our contact information was incorrect. It is only because another company offered to help us renew our license that I even knew WSEQ-LP would be expiring in December. I understand that negligence is not a valid reason for avoiding a fine; however, I hope you will consider that our station is completely non-profit. If students want additional items for the station such as microphones or headphones, we must fundraise to gain purchasing power. It took a lot

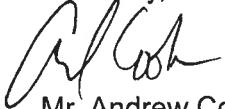
of initial contributors to get the radio station up and running many years ago, and I would hate for us to stop operation because the paperwork was not properly filed. We have no school account as we make no money and have no allotted budget. We have no way of paying the \$1500.00 fine.

You have asked for our financial records, but due to our lack of any funding, we have no records to submit. South Caldwell High School does not file a tax return as we are an educational agency, and thus exempt from filing a tax return under federal requirements. The radio station cannot provide a financial statement or a printout of our financial status because we do not generate any revenue and have no source of funds. Finally, there is no account attached to or associated with the radio station because it does not generate or expend money. Truly, we have no money to pay this fine because no accounts at any level of our organization, be it school or county, exist for our radio station.

Furthermore, because of many different factors, Caldwell County Schools is suffering through some extremely difficult times financially. Over the past few years, many job positions have been cut. Capital outlay budgets that were once over \$100,000 are now \$15,000. We currently, as a county, are trying to overcome an estimated 2.5 million dollar deficit, so the current fine levied on us could mean the end of the broadcasting program and the sale of all the equipment.

I have updated our profile on the FCC website so that the notices will be mailed to the correct address and person going forward. Also, I took the steps needed to renew the license as soon as I received notice that we were expiring. I would have done so when it was due had I known about it, but unfortunately, I was uninformed. Please consider waiving this monetary forfeiture and renew our license so our students can continue learning about broadcasting locally on the radio. I appreciate, in advance, any help you can offer going forward.

Sincerely,



Mr. Andrew Cook

South Caldwell High School Radio Mentor