

Licensee certifies that the station's Biennial Ownership Report (FCC Form 323 or 323-E) has been filed with the Commission, as required by 47 C.F.R. Sections 73.3615 and 74.797.

Gary Community School Corporation (GCSC) was taken over by the State of Indiana in July 2017. The State of Indiana contracted with Gary Schools Recovery, Inc, (GSRI) a subsidiary of MGT Consulting to operate the district in August 2017. At the time of the takeover, GCSC's finances, education programming and facilities were in grave disarray. The main objectives of GSRI was to stabilize the situation. GSRI augmented the staff of GCSC for the purposes of getting controls over the finances, improving the education and making the facilities fit for human habitation. At the same time, creditors of GCSC were threatening legal actions, filed legal actions, filed liens and levies and threatened to execute on liens and levies. It has taken three years to bring this situation under some semblance of control. During the past year, we have been taking inventory of assets of the district and became aware of the license in favor of GCSC. Unbeknown to GSRI or the State of Indiana, the existence of the radio license renewal was not until recently been known. It appears that the responsibility for managing the station was given to the director of the career center, in which the radio station is housed and operated. However, because the director position has turned over four times, GCSC's career center director did not maintain the filing of contemporaneous reports. With such staff turnover, GCSC cannot certify the filing of any reports in the last three years. We respectfully request that the requirement for the filing of these reports be waived due to the circumstances.

The station's Broadcast EEO Program Report (FCC Form 396), has been filed with the Commission, as required by 47 C.F.R. Section 73.2080(f)(1).

See the above statement.

Licensee certifies that the documentation required by 47 C.F.R. Section 73.3526 or 73.3527, as applicable, has been uploaded to the station's public inspection file as and when required.

Appropriate documentation is in the process of being added to the GCSC website under the Career Center heading.

Extenuating circumstances for late filing:

1. The closure the school district after March 17th, caused by the Covid-19 virus, left all of the staff and administration singly-focused on setting up work from home scenarios while striving to maintain a seamless education for 4,000+ students.
2. The FCC web site's 'WGVE page' was defective, not allowing for connection of the station's FCC ID number with the station's FCC Registration Number. The inability to do this hampered the district's abilities to proceed with the license renewal process for over two months and required several interventions by the FCC staff. The issue was finally solved in mid-July, but this was well after the deadline for filing had passed.
3. The Mass Media Bureau was launching a new method of filing for license renewals during this timeframe. This was a transition from the Adobe Acrobat forms that had been on the website for years. Instead, the method was now to fill in the renewal form, and forms involved with it, on-line, without pdf's.
4. The Gary CSC is in poor financial condition continuing to operate at a deficit for more than 10 years, prompting state takeover in 2017. While many improvements to GCSC's finances have been made the district still operates at a deficit. Therefore, a late fee at this time would be further set back efforts to eliminate the annual deficit and extraordinary debt the district carries.

5. The turnover of staff, both in the school building and at the district level coincided with license renewal and the Covid-19 shutdown. On March 1, the district brought in a new, interim Emergency Manager. In mid-June, the Career Center Director resigned. During turnover of these critical leadership roles the primary responsibility of the district was to continue the education of children in a previously untested and unused online platform. License renewal became apparent to the new district leadership after the initial filing date had passed.

As such, we respectfully request that any fees for late renewal be waived due to the circumstances.