

SOU-Licensed AM and FM Radio Stations in California
Licensee: Southern Oregon University
License Renewal Schedule 303-S
Explanatory Exhibit Related to Online Public Inspection File

As of the date of this renewal filing, the online public inspection files (OPIF) for all twelve of the full-power radio stations in California licensed to Southern Oregon University (SOU) are complete and in full compliance with FCC Rule 73.3527. These stations are:

CallSign	Facility ID	City
KNHM(FM)	12486	Bayside
KSYC(AM)	15313	Yreka
KNHT(FM)	17412	Rio Dell
KPMO(AM)	31596	Mendocino
KNCA(FM)	50621	Burney
KMJC(AM)	60024	Mt.Shasta
KLDD(FM)	61355	McCloud
KNSQ(FM)	62957	Mt. Shasta
KNYR(FM)	62967	Yreka
KWCA(FM)	86670	Palo Cedro/Redding
KJPR(FM)	129174	Shasta Lake City
KHEC(FM)	176094	Crescent City

SOU management and staff have maintained their compliance with the public file rule throughout the 2013-2021 license term for all SOU-licensed stations. Between 2013 and 2018, the public files of all SOU-licensed stations were maintained on paper, as was required by the Commission at that time. The public files for all SOU-licensed stations successfully made the required transition to the Commission's OPIF pages on or before March 1, 2018. Since that date, the SOU stations' OPIFs have been appropriately uploaded and maintained by SOU management and staff throughout the 2013-2021 license term.

During review of the SOU-licensed stations' OPIFs, however, in preparation for filing their applications for license renewal on Schedule 303-S, SOU staff identified three documents which appear as if they had been uploaded late, after the required filing date. Contemporaneous internal station records nevertheless confirm that all three documents were created and filed on time, on or before the required date, but had to be re-uploaded at a subsequent time as a result of either a personnel or a systems technical error. Specifically, SOU staff noted the following three discrepancies, which are herein explained:

1. All Stations: documents related to the 2014 KJPR EEO Audit were originally uploaded in 2017, as part of the general upload for NCE stations. This was compliant with Rule 73.3527. These documents were re-uploaded in 2021, however, in order to change the file name, not realizing that the re-upload date, not the original filing date, would be displayed,

2. KNSQ(FM) Station OPIF File: The Issues/Programs List for the first quarter of 2021 was originally uploaded to the KNSQ(FM) OPIF prior to 4/10/21, in compliance with Rule 73.3527. An upload technical error occurred, however, which was discovered by SOU station staff on May 14, 2021, at which time the original file was re-uploaded to the KNSQ(FM) OPIF. None of the other SOU stations experienced a technical error with respect to the original upload of this document.

3. KJPR AM Station File: The Issues/Programs List for the first quarter of 2018 was originally uploaded to KJPR(AM) OPIF prior to 4/10/18, in compliance with Rule 73.3527. An upload technical error occurred, however, which was discovered by SOU staff on 7/10/18, at which time the original file was re-uploaded to the KJPR(FM) OPIF. None of the other SOU stations experienced a technical error in the original upload of this document.

The SOU governing board and management note the record of compliance on the part of SOU staff members, but sincerely acknowledge and regret the public file technical errors described above. SOU management has taken concrete specific actions to avoid such errors in the future, including the development of a method and practice for double-checking the technical efficacy of OPIF uploads. FCC legal counsel will continue to consult, on at least a quarterly basis, with station management and staff to ensure timely and complete FCC public file compliance.