

W36EX-D Reporting Compliance

Liberty Communications Corp. is a small adjunct to a local ministry in Alton, Illinois. It has no separate station staff. During the past 20 months, the licensee has been coping with the logistics of moving the licensed facility from Channel 50 to Channel 36, seeking reimbursements through the complicated mechanism established for that purpose and, of course, dealing with the pandemic and determining under what conditions the church would be able to resume regular in person services. In this situation, the renewal deadline – for which we received no notice – completely escaped our attention. Once we discovered that a station renewal application was overdue, we acted swiftly to audit our public file, refresh or regular reports, and get the renewal done.

In the course of that review, we found that the licensee had been largely compliant with the critical quarterly reports for Class A continuing eligibility and for children's programming. However, the reports on quantitative limits in children's program have not been maintained past the fourth quarter of 2012. The station does not originate its own children's programs, and all of the syndicated program services we utilize are by companies well versed in the noncommercial limits. Therefore we believe that, throughout this period, there have not been any times of excess commercialization during children's programs. We intend in the future to follow these deadlines and see to it that the children's quantitative reports and other reports are timely filed.

Our audit also disclosed that we had not submitted a current biennial ownership report or a new EEO report. These have now been submitted, and will be renewed as required in the future.

The licensee recognizes that its license is a privilege conferred by the Federal Government that carries with it certain basic public interest obligations. Among these is a duty to respect both the actual and the timely requirements for periodic reporting. In the future, we will establish an office of station compliance officer and, working with regulatory counsel, will closely monitor and follow all the reporting schedules.