

April 24, 2023

*Amendment to KSYS (TV) and KFTS (TV) License Renewal Application*

Southern Oregon Public Television, Inc. is the 501c3 nonprofit licenseholder for KSYS (TV) (Facility ID 61350; Medford, OR) and KFTS (TV) (Facility ID 61335; Klamath Falls, OR).

Southern Oregon PBS (dba SOPBS) serves the Medford-Klamath Falls Nielsen DMA #136, with 183,100 TV Households, according to the 2022-23 Nielsen Estimate.

I was hired in early 2022, and started as President & CEO on May 9, 2022. Mindy Gomes, Administrative Assistant, began on April 4, 2022. As we started preparation for our license renewal, she was assigned responsibility of the public files.

In September 2022, outside counsel pointed out the need for housekeeping and checking the public files for any missing documents. Mindy started correcting missing files and organizing them. For this reason, as well as the transition from the FCC's CDBS system to the LMS, and delays in uploading materials to the FCC web site, there was a considerable amount of time necessary to identify and rectify our noncompliance.

**Cause: Staff Turnover and Lack of Training**

As a small noncommercial educational station, SOPBS only has fifteen (15) full-time employees (FTE). Since December 2019, there has been turnover in eleven (11) of those positions, some more than once, and some positions have remained vacant for months at a time. The licensee had, and still has, difficulty in recruiting and retaining qualified people in such a small market.

The task of uploading files to the FCC website was originally assigned to the Director of Marketing and Communications. There was a nine-month gap, from December 2017 to September 2018, where SOPBS had no Director of Marketing and Communications.

This vacancy coincides with when the uploading seemed to fall off and become sporadic, when 2017 Q4 was supposed to be uploaded (1/10/2018).

**Cause: Leadership Health Issues / Retirement**

The previous President & CEO, who was ultimately responsible for compliance during this period, retired in September 2021 after several months' absence for health reasons, an

interim CEO was appointed, and there was an eight-month gap before I started, as well as a five-month gap before Mindy took over for the longtime Administrative Assistant, who also retired.

### **Cause: COVID 19 Pandemic**

During the period from roughly March 2020 through May of 2022, SOPBS employees were working almost entirely remotely. Between remote work and no overlap in employees having responsibility for posting the reports, there was no one to train new employees in their duties and responsibilities.

### **Moving Forward: A History of Service**

SOPBS has provided noncommercial educational programming to six counties in Southern Oregon since 1977. That service continued through staff turnover, understaffing and a worldwide pandemic. Until recently, the station has been in full compliance with the Commission's Rules and policies. Despite a small staff and a small budget, SOPBS is proud of the fact that it continued to produce local programming and broadcast four channels of educational programming during the last license period. New management brought the station into compliance on the public file reporting requirements in advance of the license renewal application.

### **Moving Forward: Impact of Potential Fines**

We believe the imposition of large fines on KSYS and KFTS would have a severe impact on the ability of the stations to continue to provide the same amount of high quality, noncommercial educational programming to residents of the six-county Medford and Klamath Falls service areas.

### **Moving Forward: A Commitment to Compliance**

I have overseen three FCC TV License Renewals in my career in two different states. The stations I managed were fully compliant with all FCC reporting requirements, and had no FCC warnings or fines.

All SOPBS Quarterly Issues and Programs Reports were uploaded to the FCC Public Files web site by September 26, 2022, in advance of the Oregon license renewal deadline. SOPBS has been in compliance since its license renewal application.

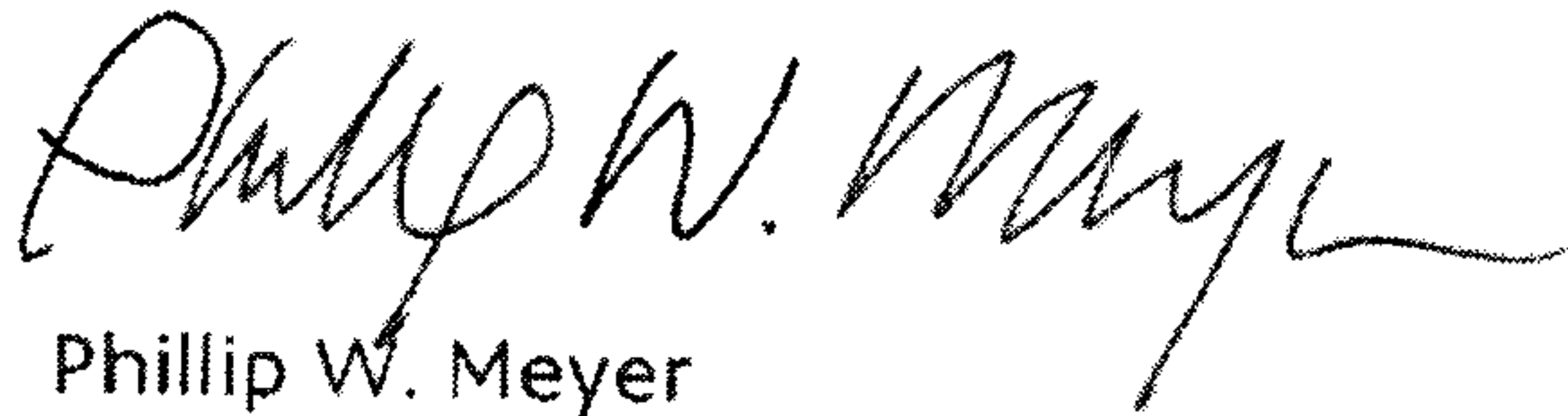
FCC License Renewal Amendment

April 24, 2023

Page 3

I sincerely believe in the importance of the public service rendered by noncommercial educational stations, especially in smaller markets. I remain committed to continuing to fully comply with operating and record-keeping Rules, as I and our staff have since I assumed the presidency of SOPBS.

Sincerely,

A handwritten signature in black ink, reading "Phillip W. Meyer". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Phillip W. Meyer

President & CEO

Southern Oregon PBS