



Federal Communications Commission
Washington, D.C. 20554

January 3, 2024

Leo Ashcraft,
Technical Representative
Nexus Broadcast
8601 Hwy 67
Ballinger, TX 76821
(via email Leo@nexusbroadcast.com)

Andres Serrano, Pastor
Andres Serrano Ministries
1717 Via Del Rio
Corona, CA 92882
(via email Andres@radioimpacto.org)

Lorena Serranos, President
Andres Serranos Ministries, Inc.
2926 FM 2254
Pittsburg, TX 75686

In re: KGWP(FM), Pittsburg, TX
Facility ID No. 106449
File No. 0000138123

KGIC-LP, Corona, CA
Facility ID No. 124903
File No. 0000157963

**Letter of Inquiry – Response
Required within 30 Days**

Dear Licensee and Representatives:

The Media Bureau, Audio Division (Bureau) is considering the above-referenced applications (Renewal Applications) from two similarly-named entities seeking to renew radio station licenses. Andres Serranos Ministries, Inc. (ASM, Inc.)¹ has applied to renew the license of KGWP(FM), Pittsburg, Texas, a noncommercial educational FM station.² Andres Serrano Ministries (ASM) seeks to renew the

¹ Although the renewal application for KGWP(FM) was filed under the name “Serranos,” articles of incorporation filed with the state of Texas and a station purchase agreement, each submitted to the Bureau with an assignment application in 2006, spell the name without a final “S,” *i.e.*, Serrano.

² File No. 0000138123 (filed Mar. 8, 2021).

license of Low Power FM (LPFM) station KGIC-LP, Corona, California.³ The applicants are represented by the same technical consultant and appear to be broadcasting the same programming,⁴ but have different addresses, phone numbers, FCC registration numbers (FRN), and application signatories.⁵ The Bureau requires additional information to determine appropriate action on the Renewal Applications. **The licensees are required to respond within thirty (30) days of this letter.**

Background

Section 73.860(a) of the Commission's rules (Rules)⁶ prohibits cross-ownership of LPFM stations and other broadcast stations. Section 73.860(e) of the Rules⁷ prohibits LPFM licensees from entering into operating agreements with other stations. The Commission adopted these restrictions because it established the LPFM service to provide opportunities for new diverse voices.⁸ Section 301 of the Communications Act of 1934, as amended, (Act) permits broadcasting only in accordance with the terms of a station license.⁹ Broadcast licenses terminate as a matter of law pursuant to section 312(g) of

³ File No. 0000157963 (filed Aug. 25, 2021).

⁴ The two stations appear to be affiliated with an organization named Radio Impacto, whose website indicates that it has three stations: KGIC-LP, KGWP(FM), and an AM station located in the Dominican Republic. See <https://radioimpacto.org> (accessed Nov. 30, 2023). Programming on the stations appears to be similar or identical. For example, the "escuchar en vivo" (listen live) option on the Radio Impacto web site was simulcasting the same material from each station when Bureau staff listened to the online feeds on November 30, 2023. See <https://radioimpacto.org/escuchar-en-vivo/#corona> (accessed Nov. 30, 2023). Several days later, Bureau staff listened again for a station identification announcement. The announcement listed the call signs and frequencies of all three stations, one after another. The Radio Impacto web site lists a weekly program line-up without distinguishing between the stations. See <https://radioimpacto.org/programacion> (accessed Nov. 30, 2023). The graphic design of the Radio Impacto logo is the same for each station, changing only to include the correct frequency. Various members of the Serrano family host programs on what appears to be a common feed.

⁵ ASM uses FRN 0009316951. ASM, Inc. uses FRN 0008625634. The given addresses appear to be those of two churches, each also associated with Radio Impacto. KGIC-LP's address corresponds to that of Iglesia Reformada La Senda and with the headquarters of Radio Impacto. The web site for that church identifies Andres and Lorena Serrano as its pastors and uses radioimpacto.org as its domain. See <https://radioimpacto.org/iglesia-la-senda/> (accessed Dec. 26, 2023). KGWP(FM)'s address corresponds to that of Iglesia Reformada en Pittsburg. Section 73.3513 of the Rules, 47 CFR § 73.3513, requires license renewal applications from corporate broadcast licensees to be signed by an officer of the licensee. Lorena Serrano[s] signed the KGWP(FM) renewal application as President of ASM, Inc. The renewal application for KGIC-LP, which is unclear as to corporate status, is signed by Andres Serrano, Pastor. We note, however, that the California Secretary of State lists Andres Serrano Ministries as a non-profit corporation with Andres Serrano as its Chief Executive Officer. Lorena and Andres Serrano[s] are apparently spouses. A Facebook page for Lorena Serrano lists her as Executive Director of Radio Impacto from November 2007 through present. See <https://www.facebook.com/ana.paz.144734> (accessed Dec. 8, 2023).

⁶ 47 CFR § 73.860(a).

⁷ 47 CFR § 73.860(e).

⁸ See *Creation of Low Power Radio Service*, Report and Order, 15 FCC Rcd 2205, 2218, para. 30 (2000) (subsequent history omitted).

⁹ 47 U.S.C. § 301.

the Act if the station is silent or operates from an unauthorized location for twelve consecutive months.¹⁰ In this manner, the Commission ensures that stations provide service to the public, as authorized.

ASM built KGIC-LP as a new station, first licensed in 2005.¹¹ In 2006, ASM, Inc. applied for Bureau consent to acquire the license of KGWP(FM) through assignment.¹² A standard question on the Assignment Application asks parties to identify any other broadcast interests, and ASM, Inc. responded “not applicable.”¹³ ASM, Inc. further certified that its acquisition of KGWP(FM) complied with the Commission’s ownership rules.¹⁴ In describing its educational mission, ASM, Inc. stated that it had incorporated in Texas and briefly mentioned the LPFM service.¹⁵ The purpose, if any, of those references was unclear. It now appears, however, that ASM, Inc. or those with attributable interests may have succeeded ASM and/or have taken control of KGIC-LP without filing an application for Bureau consent, as would be required pursuant to section 310(d) of the Act.¹⁶ It further appears that ASM, Inc., or parties/entities common to each, may hold attributable or controlling interests in licenses for both KGWP(FM) and KGIC-LP, and that the stations may have an operating agreement (written or oral) with each other, in violation of sections 73.860(a) and (e) of the Rules.¹⁷

¹⁰ 47 U.S.C. § 312(g); *Eagle Broad. Group, Ltd. v. FCC*, 563 F.3d 543, 553 (D.C. Cir. 2009) (operation from unauthorized location no better than silence).

¹¹ File No. BLL-20040714AAZ (granted Apr. 27, 2005). The application for a construction permit was filed under the name Ministerio Palabra Viva (MPV) but the permit was issued to ASM. File No. BNPL-20000602AID (granted Apr. 2, 2004). Records of the California Secretary of State reflect that MPV was established in 1998 and amended its articles of incorporation in 2002 to change the name to ASM. *See* <https://bizfileonline.sos.ca.gov/search/business> (Control No. LBA17053894, Corp. No. 2126444) (Nov. 25, 2002). At that time the ASM board consisted of Andres Serrano, Lorena Serrano, and Santos Gonzales. Documents that ASM filed with California in 2020 and 2023 reflect that the officers are Andres Serrano, Jael Serrano, and Andy Serrano. A 2022 ownership report filed with the Commission for ASM, Inc. lists Lorena Serrano[s], Julia Serrano, and Hans Serrano as officers. *See* File No. 0000185505 (rec. Sept. 21, 2022). ASM, Inc. responds “no” to a question on the application asking whether it or its board is controlled by another entity. *Id.*

¹² KGWP was first licensed in 2003 to Millenium Broadcasting Corp. (MBC). MBC assigned the license to ASM, Inc. in 2006. *See* File No. BALED-20051230AFK (consummated Apr. 27, 2006) (Assignment Application). At that time, ASM, Inc.’s officers were Marta Dainota, Rafael Navarro, and Rafael Garcia. ASM, Inc. filed an application for consent to transfer of control in 2007, reflecting that Lorena Serrano was serving as President and had replaced Marta Dainota. Rafael Navarro, and Rafael Garcia continued to serve at that time. *See* File No. BTCED - 20070830AEF (granted Oct. 15, 2007).

¹³ *Id.*, Q. III (5). Failure to disclose ASM’s license for KGIC-LP may have violated section 1.17 of the Rules by omitting material information necessary to prevent a material factual statement from being incorrect or misleading. 47 CFR §1.17.

¹⁴ *Id.*, Q. III (6) (b).

¹⁵ *See* Assignment Application, Attach. 1, Mission Statement of Andres Serrano Ministries (“With the advent of FCC support for LPFM, the group has formalized with an application for incorporation in the State of Texas as a nonprofit corporation committed to that goal.”).

¹⁶ 47 U.S.C. § 310(d) (prohibiting the transfer, assignment or disposal of a station license “in any manner, voluntary or involuntary, directly or indirectly . . . to any person except upon application to the Commission and upon finding by the Commission that the public interest, convenience, and necessity will be served thereby.”).

¹⁷ *See supra*, note 4.

Each of the pending Renewal Applications certifies that the respective station has not violated any provision of the Rules or of the Act. For KGWP(FM), which is subject to online public inspection file requirements, ASM, Inc. certifies that it has maintained an online public inspection file, as required.¹⁸ However, KGWP(FM)'s file in the Commission's database has very minimal content and is missing, for example, quarterly lists of significant treatment of issues of community importance and lists of donors.¹⁹ Nor does the Radio Impacto web site, radioimpacto.org, contain such information.

In 2021, the Commission's Enforcement Bureau (EB) received a complaint alleging that KGIC-LP was operating from an unauthorized location and that ownership was the same as KGWP(FM). On November 30, 2023, EB agents visited the licensed transmitter site of KGIC-LP and determined that there were no transmissions originating from that location. The agents observed that there were no roads or power lines leading to that location, which appeared to be a mining or gravel pit. Nevertheless, the inspectors heard a signal for KGIC-LP, which they traced to a tower operated by Crown Castle, approximately five miles north of the licensed location. This unauthorized operation potentially triggers automatic license expiration under section 312(g) of the Act.

Instructions

If Licensee requests that any information or Documents, as defined herein, responsive to this letter be treated in a confidential manner, it shall submit, along with all responsive information and Documents, a statement in accordance with section 0.459 of the Rules.²⁰ Requests for confidential treatment must comply with the requirements of section 0.459, including the standards of specificity mandated by section 0.459(b). Accordingly, "blanket" requests for confidentiality of a large set of documents are unacceptable. Pursuant to section 0.459(c), the Bureau will not consider requests that do not comply with the requirements of section 0.459.

If Licensee withholds any information or Documents under claim of privilege, it shall submit, together with any claim of privilege, a schedule of the items withheld that states, individually as to each such item, the numbered inquiry to which each item responds and the type, title, specific subject matter, and date of the item; the names, addresses, positions, and organizations of all authors and recipients of the item; and the specific ground(s) for claiming that the item is privileged.

Each requested Document, as defined herein, shall be submitted in its entirety, even if only a portion of that Document is responsive to an inquiry made herein, unless the Document is a recording or transcript, in which case it should be provided only for the period of the broadcast specified in the pertinent inquiry herein. This means that the Document shall not be edited, cut, or expunged, and shall include all appendices, tables, or other attachments, and all other Documents referred to in the Document or attachments. All written materials necessary to understand any Document responsive to these inquiries must also be submitted. If any Document is in a language other than English, provide the original and an English translation.

¹⁸ There is no such certification for KGIC-LP because LPFM stations are not required to maintain a public inspection file.

¹⁹ See <https://publicfiles.fcc.gov/fm-profile/kgwp>.

²⁰ 47 CFR § 0.459.

If a Document responsive to any inquiry made herein existed but is no longer available, or if the Licensee is unable for any reason to produce a Document responsive to any inquiry, identify each such Document by author, recipient, date, title, and specific subject matter, and explain fully why the Document is no longer available or why the Licensee is otherwise unable to produce it.

With respect only to Documents responsive to the specific inquiries made herein and any other Documents relevant to those inquiries, the Licensee is directed to retain the originals of those Documents for twelve (12) months from the date of this letter unless the Licensee is directed or informed by the Media Bureau in writing to retain such Documents for some shorter or longer period.

The specific inquiries made herein are continuing in nature. The Licensee is required to produce in the future any and all Documents and information that are responsive to the inquiries made herein but not initially produced at the time, date and place specified herein. In this regard, the Licensee must supplement its responses: (a) if the Licensee learns that, in some material respect, the Documents and information initially disclosed were incomplete or incorrect; (b) if additional responsive Documents or information are acquired by or become known to the Licensee after the initial production; or (c) subsequent events generate additional Documents. The requirement to update the record will continue for twelve (12) months from the date of action on the Application unless the Licensee is directed or informed by the Media Bureau in writing that the Licensee's obligation to update the record will continue for some shorter or longer period.

For each Document or statement submitted in response to the inquiries below, indicate, by number, to which inquiry it is responsive and identify the person(s) from whose files the Document was retrieved. If any Document is not dated, state the date on which it was prepared. If any Document does not identify its author(s) or recipient(s), state, if known, the name(s) of the author(s) or recipient(s). The Licensee must identify with reasonable specificity all Documents provided in response to these inquiries.

Unless otherwise indicated, the period of time covered by these inquiries is January 2013 (generally corresponding to beginning of the most recent license term) up to the present.

Definitions

For purposes of this letter, the following definitions apply:

"Any" shall be construed to include the word "all," and the word "all" shall be construed to include the word "any." Additionally, the word "or" shall be construed to include the word "and," and the word "and" shall be construed to include the word "or." The word "each" shall be construed to include the word "every," and the word "every" shall be construed to include the word "each."

"ASM" shall mean Andres Serrano Ministries, regardless of any misspelling in the name, the licensee of Low Power FM station KGIC-LP, Corona, California.

"ASM, Inc." shall mean Andres Serranos Ministries, Inc., regardless of any misspelling in the name, the licensee of noncommercial educational FM station KGWP(FM), Pittsburg, Texas.

"Bureau" shall mean the Media Bureau of the Federal Communications Commission.

"Distance" shall mean the linear distance measured in feet, and fractions thereof, at ground level. Distances greater than twenty feet can be reported in yards and/or miles.

“Document” shall mean the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including but not limited to any draft or final tax form, contract, correspondence, letter, facsimile, e-mail, text message, file, invoice, memorandum, note, report, record, handwritten note, working paper, routing slip, chart, graph, photograph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minutes, marketing plan, research paper, preliminary drafts, press release, website, or versions of all of the above, and computer material (print-outs, cards, magnetic or electronic tapes, disks and such codes or instructions as will transform such computer materials into easily understandable form). “Document” shall also include the terms of any oral agreement or understanding. If a matter responsive to a request for documents is unwritten, the Licensee should so state, and provide a written narrative of the operative provisions of oral agreement, identifying its date, parties, and terms.

“FCC” shall mean the Federal Communications Commission.

“Licensed Corona Site” shall mean the authorization, including the antenna structure and transmitter location, authorized by File No BLL-20040714AAZ (granted Apr. 27, 2005).

“Licensed Pittsburg Site” shall mean the authorization, including the antenna structure and transmitter location, authorized by File No BMLED-20080604ABH (granted July 29, 2008).

“Licensee” shall mean ASM, ASM, Inc., and any predecessor-in-interest, successor-in-interest, affiliate, parent company, wholly or partially owned subsidiary, other affiliated company or business, and all trustees, owners, including but not limited to, partners or principals, and all directors, officers, employees, or agents, including consultants and any other persons working for or on behalf of the foregoing at any time during the period covered by this letter.

“Renewal Applications” shall mean the applications, File No. 0000138123 to renew the license of KGWP(FM), Pittsburg, TX and File No. 0000157963 to renew the license of KGIC-LP, Corona, CA.

“Stations” shall mean, jointly, KGWP(FM), Pittsburg, Texas, Facility ID No: 106449 and KGIC-LP, Corona, CA, Facility ID No. 124903. When referencing only one of the Stations, we use that station’s call sign.

Inquiries: Documents and Information to be Provided

Licensee Identity Information

1. Provide the correct spelling of the name Serrano[s]. If the ASM or ASM, Inc. name contains a spelling error, the response should include a request that the Bureau correct the error in the FCC database.
2. Identify the person(s) who prepared the Renewal Applications and whether the signatories thereto reviewed the answers prior to certifying to their accuracy and submitting to the FCC.

- a. If the signatories reviewed before filing, explain any misspelling of the family name of Lorena Serrano[s] and Andres Serrano[s] and certification to potentially inaccurate responses such as KGWP(FM)'s compliance with public file requirements.
3. Provide a narrative describing the relationship, if any, between ASM and ASM, Inc. Include:
 - a. Whether ASM continues to exist as an independent entity or whether it has been replaced by ASM, Inc.
 - b. If ASM and ASM, Inc. are two separate entities, describe their similarities and differences. Identify, from ASM, Inc.'s incorporation in 2006 through present, the names and positions of persons holding attributable interests in each.
4. Does ASM, Inc. operate or control KGIC-LP? If so, when did its operation or control of KGIC-LP begin? Include the file number, if any, of any request for FCC consent to the transfer of control.
5. Provide a narrative identifying Radio Impacto and its relationship to the Licensee and to the Stations. Identify, from January 2021 to present, the names and positions of Radio Impacto's officers, directors, and owners.

KGIC-LP Operating Information

6. Provide the following information for the Licensed Corona Site:
 - a. What is the street address and coordinates for the Licensed Corona Site (and, if different, the street address and coordinates for KGIC-LP's current antenna site)?
 - b. If the Licensed Corona Site is different from KGIC-LP's current antenna site, what is the Distance between the two locations?
 - c. Provide Documents, including but not limited to any photographs, rent payments, and leases, showing dates that KGIC-LP had or has transmission facilities at the Licensed Corona Site.
 - d. Document the equipment used to broadcast from the Licensed Corona Site. For example, did Licensee use a temporary telescoping antenna on a truck? If so, what was the Distance from the temporary facility to the Licensed Corona Site? Did Licensee construct a permanent antenna structure at the Licensed Corona Site? What was the source of KGIC-LP power at the Licensed Corona Site?
7. For the period of January 1, 2021 to the present, provide a timeline detailing periods of KGIC-LP operations and silence, including:
 - a. Dates on air from the Licensed Corona Site;
 - b. Dates on air from a location(s) other than the Licensed Corona Site, including for each such on-air periods the street address and coordinates of the antenna location

- and FCC application file number, if any, granting permanent or temporary authority to operate at that location; and
 - c. Dates of silence, including the reason for that silence, FCC application file number granting authority to remain silent, and date of resumption of broadcasting.
8. For each antenna location KGIC-LP used between January 1, 2021 through the present, provide Documents from site owners and any others who control a site, permitting Licensee's use thereof. Identify the dates of site use to which each Document pertains. Include the terms of any oral agreement.
 9. What role(s), if any, do Andres Serrano, Lorena Serrano, Jael Serrano Altamirano, Andy Serrano and other members of the Serrano family play with respect to decisions concerning programming, finances, and personnel matters at KGIC-LP?

KGWP(FM) Operating Information

10. Provide the following information for the Licensed Pittsburgh Site:
 - a. What is the street address and coordinates for the Licensed Pittsburgh Site (and, if different, the street address and coordinates for KGWP'(FM)s current antenna site)?
 - b. If the Licensed Pittsburgh Site is different from KGWP(FM)'s current antenna site, what is the Distance between the two locations?
 - c. Provide Documents, including but not limited to any photographs, rent payments, and leases, showing dates that KGWP(FM) had or has transmission facilities at the Licensed Pittsburgh Site.
 - d. Document the equipment used to broadcast from the Licensed Pittsburgh Site. For example, did Licensee use a temporary telescoping antenna on a truck? If so, what was the Distance from the temporary facility to the Licensed Pittsburgh Site? Did Licensee construct a permanent antenna structure? What was the source of KGWP(FM) power at the Licensed Pittsburgh Site?
11. For the period of January 1, 2021 to the present, provide a timeline detailing periods of KGWP(FM) operations and silence, including:
 - a. Dates on air from the Licensed Pittsburgh Site;
 - b. Dates on air from a location(s) other than the Licensed Pittsburgh Site, including for each such on-air period the street address and coordinates of the antenna location and FCC file number, if any, granting permanent or temporary authority to operate at that location; and
 - c. Dates of silence, including the reason for that silence, FCC file number granting authority to remain silent, and date of resumption of broadcasting.
12. For each antenna location the Station used between January 1, 2021 through the present, provide Documents, including the terms of any oral agreement, from site owners and any

others who control a site, permitting Licensee's use thereof. Identify the dates of site use to which each Document pertains.

13. What role(s), if any, do Andres Serrano, Lorena Serrano, Jael Serrano Altamirano, Andy Serrano and other members of the Serrano family play with respect to programming, finances, and personnel matters at KGWP(FM)?

Rule Compliance

14. Does Licensee believe that ASM, Inc.'s acquisition of and current license for KGWP(FM) is consistent with section 73.860(a) although ASM holds a license for KGIC-LP? If so, fully explain Licensee's reasoning.
15. Document any agreement (oral or written) concerning operation or programming of the Stations. Explain how each such agreement is consistent with section 73.860(e).
16. Do the Stations simulcast the same programming? If so, approximately what percentage of the programming is simulcast?
 - a. From where does programming of the Stations originate and what is the method by which each receives the programming?
 - b. Identify any differences in the material the Stations broadcast, such as programming responsive to problems of their respective communities or different station identification announcements pursuant to section 73.1201 of the Rules.
17. Provide a narrative and, if appropriate, an amendment to the Renewal Applications, concerning Licensee's certifications that it has complied with all overall Rule requirements at both Stations and, specifically, has timely uploaded all required information for KGWP(FM) to a public inspection file. For example, if Licensee determines that it was required to, but did not, obtain a construction permit prior to operating the one or both of the Stations at their current antenna locations, it should change its answer concerning rule compliance from "yes" to "no." Similarly, for KGWP(FM), Licensee should review and potentially amend its answer concerning compliance with 47 CFR § 73.3527 which has, since March 1, 2018, required noncommercial broadcast stations to maintain and timely update an online public inspection file.
18. Provide quarterly lists of the most significant issues and programs addressed in KGWP(FM) programming, as required to be placed in an online public inspection file pursuant to section 73.3527(e)(8). If these documents were reconstructed or late filed so state.
19. Provide logs for the past two years of the Stations' tests and activations of the Emergency Alert System (EAS).

We direct the Licensee to support its response with an affidavit or declaration under penalty of perjury, signed and dated by an authorized officer of the Licensee with personal knowledge of the representations provided in the Licensee's response, verifying the truth and accuracy of the information therein and that all of the information and/or recordings requested by this letter which are in the Licensee's possession, custody, control or knowledge have been produced. If multiple people contribute to the response, in addition to such general affidavit or declaration of the authorized officer of the Licensee noted above, if such officer (or any other affiant or declarant) is relying on the personal knowledge of any other

individual, rather than his or her own knowledge, provide separate affidavits or declarations of each such individual with personal knowledge that identify clearly to which responses the affiant or declarant with such personal knowledge is attesting. All such declarations provided must comply with section 1.16 of the Commission's rules,²¹ and be substantially in the form set forth therein. To knowingly and willfully make any false statement or conceal any material fact in reply to this inquiry is punishable by fine or imprisonment.²² Failure to respond appropriately to this Bureau letter of inquiry may constitute a violation of the Communications Act and the Rules.²³

We direct Licensee to provide the information within **thirty (30) days** of the date of this letter.

Additionally, unless and until otherwise instructed by the Commission, the Media Bureau, or their representatives, we hereby direct that the Licensee shall not place in its public file or upload to its online public file this letter, any supplements thereto, or any other correspondence from the Commission concerning this investigation, materials related to such inquiries, Licensee responses to such inquiries, or any Documents in connection with such responses not otherwise requested to be placed in the public file or uploaded to the online public file.

We will defer action on any applications from Licensee pending receipt of the requested response. **Failure to respond within the time period specified may result in dismissal of such applications for failure to respond to official correspondence pursuant to Section 73.3568²⁴ of the Commission's Rules in addition to all other applicable consequences.**

If you have any questions concerning the content of this letter, please contact Irene Bleiweiss, Attorney, by phone at (202) 418-2785 or email at Irene.Bleiweiss@fcc.gov.

Sincerely,

Albert Shuldiner
Chief, Audio Division
Media Bureau

²¹ 47 CFR § 1.16.

²² See 18 U.S.C. § 1001; *see also* 47 CFR § 1.17.

²³ See *SBC Communications, Inc.*, Forfeiture Order, 17 FCC Rcd 7589 (2002); *Globcom, Inc.*, Notice of Apparent Liability for Forfeiture and Order, 18 FCC Rcd 19893, n.36 (2003); *World Communications Satellite Systems, Inc.*, Forfeiture Order, 19 FCC Rcd 2718 (EB 2004); *Donald W. Kaminski, Jr.*, Forfeiture Order, 18 FCC Rcd 26065 (EB 2003).

²⁴ 47 CFR § 73.3568.