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Please reply to AARON S. EDELMAN
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November 16, 2018

Our File No. 22937-00100

BY HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Accepted / Filed

NOV 16 2018

Federal Communications Commission
Office of the Secretary

STAMP & RETURN

Re: NAL/Acct. No. MB-201441410032
FRN: 0003626363
Facility ID No. 1749
File No. BRED-20140328AAR

Dear Ms. Dortch:

On behalf of American International College, licensee of noncommercial educational radio station WAIC, Springfield, MA, I hereby transmit its third and last Annual Compliance Report required by a Consent Decree entered into with respect to the above-captioned matter.

Please refer any questions concerning this matter directly to this office.

Very truly yours,

Aaron S. Edelman

Enclosure

cc: Mr. Albert Shuldiner (albert.shuldiner@fcc.gov)

GSB:9730616.2

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
American International College)	NAL/Acct. No. MB-201441410032
)	FRN: 0003626363
For Renewal of License for)	Facility ID No. 1749
Station WAIC(FM))	File No. BRED-20140328AAR
Springfield, Massachusetts)	

**WAIC Third Annual
Compliance Report**

To: The Commission
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

cc: Mr. Albert Shuldiner (albert.shuldiner@fcc.gov)

November 16, 2018

WAIC Third Annual Compliance Report

American International College ("AIC"), licensee of noncommercial educational FM radio station WAIC, Springfield, Massachusetts ("WAIC") is filing this Third Annual Compliance Report ("Report") pursuant to the requirements of a Consent Decree released in the above-captioned proceeding on November 16, 2015 (the "Effective Date"). As a condition of granting the renewal application for WAIC, the Consent Decree required AIC to implement a number of procedures to insure future compliance with Commission Rules and to submit three annual reports that certify ongoing compliance with the terms of the Consent Decree. This is the third and last of those reports. It covers the period from November 16, 2017 to November 16, 2018 (the "Reporting Period"). The Consent Decree sets forth five procedures, listed below in italics (A-E), to be adopted by AIC. AIC reports on each procedure:

- I. A. *The Station Manager and other appropriate staff of the Station will review all programming which, in the Licensee's judgment, constitutes public affairs and public service programming, broadcast by the Station. A selection of these programs will be compiled into quarterly issues and programs lists that will be timely placed in the public file of the Station.*

WAIC's Station Manager has reviewed the public affairs and public service programming broadcast by WAIC and placed a selection of these programs in the WAIC public inspection file each quarter, in the form of a quarterly issues and programs list. A copy of each issues and programs list was sent to AIC's communications counsel to determine that the lists satisfy FCC requirements.

- B. *All such quarterly issues and programs lists will be signed and dated by their preparer before they are placed in the public file.*

All quarterly issues and programs lists were signed, dated, and placed in the WAIC public file.

- C. *Late-filed lists will be reviewed and signed by the Station's management and accompanied in the Station's public file with a statement indicating the nature of the document, the date placed in the public file, and the reason for the late filing.*

The Second Quarter 2018 list was filed on July 17, 2018, seven days after the deadline. WAIC regulatory compliance, including compiling and posting quarterly issues and programs lists, is handled by the faculty of licensee AIC. While AIC faculty have been diligent about posting the quarterly issues and programs lists in all other quarters since the Effective Date, the Second Quarter deadline falls after the traditional spring semester and during the college's summer break when the faculty is only intermittently on campus. The late filing for the Second Quarter 2018 was the result of staff absence during the break and failure to anticipate the need to post the report during the break which was not handled until after the staff returned from the

break. The licensee has taken steps to ensure it does not happen again by putting longer lead time in their calendars for postings that are required during school breaks.

The Third Quarter 2018 list was uploaded before the October 10, 2018 deadline. However, WAIC encountered technical issues with the online public file on the day the list was uploaded where the website was very slow and kept crashing. On October 16, 2018, WAIC discovered that the Third Quarter list had only been partially uploaded and immediately replaced the file with a complete version of the list.

- D. *Within 30 days of the Effective Date of this Compliance Plan, Licensee will conduct training for all Station staff and management on compliance with Commission Rules applicable to Station operations. It will also designate a Compliance Officer responsible for responding to staff questions and consulting with counsel familiar with Communications law regarding compliance matters. Additionally, Licensee will conduct refresher training for staff and management at least once every twelve (12) months, and will train any new Station staffer within five (5) business days of commencement of his or her duties at the Station.*

As required by the Consent Decree, AIC appointed a Compliance Officer who is responsible for responding to questions about regulatory compliance, for consulting with AIC's communications counsel and for implementing AIC's Compliance Plan. As part of the Compliance Plan, counsel conducted a telephone training session with WAIC's Station Manager and the Compliance Officer and has provided written guidance on various regulatory requirements throughout the Reporting Period. Additionally, counsel conducted refresher training with staff prior to filing this report. There were no new hires during the Reporting Period that required training.

- E. *Licensee will use a commercially-available calendaring system, such as Microsoft Outlook or Google Calendar, to track filing deadlines.*

As part of the Compliance Plan, AIC's counsel created a calendaring system to track deadlines for all FCC filings, including Biennial Ownership Reports and quarterly issues and programs lists. The system alerts AIC and AIC counsel to all FCC deadlines so that timely filings can be made.

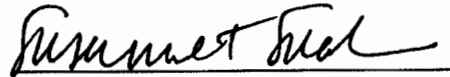
- II. As required by the Consent Decree, the Compliance Officer has completed an audit of WAIC's local public file and has found it to be in compliance with the FCC's rules and regulations as of November 16, 2018. No deficiencies were discovered during the audit.

[REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

COMPLIANCE CERTIFICATION

Dr. Susanne T. Swanker, under penalty of perjury, hereby declare, as follows:

1. As the Dean of the School of Business, Arts and Sciences, I supervise Marty Langford, the designated Compliance Officer for WAIC, Springfield, Massachusetts.
2. The Compliance Officer is charged with the duty of insuring that AIC complies with the terms of both the Compliance Plan and the Consent Decree.
3. To the best of my knowledge and belief, the statements set forth in the foregoing WAIC Third Annual Compliance Report are true and correct.



Dr. Susanne T. Swanker
American International College

Executed this 16 day of November, 2018

GSB:9730778.2