

September 17, 2021

Chief, Investigations & Hearings Division

Enforcement Bureau

Federal Communications Commission  
9050 Junction Drive

Annapolis Junction, MD 20701

**Re: Second Compliance Report, NAL/Acct. No. MB-202041410004  
Big Horn Media, Inc.**

To the Chief, Investigations & Hearings Division:

Pursuant to the Consent Decree released September 18, 2020, Big Horn Media, Inc. ("Big Horn" or "Company") hereby submits its second annual Compliance Report describing the procedures it has instituted in accordance with the Consent Decree. Specifically, in order to ensure the Company's compliance with the Consent Decree's terms and conditions, Section 310(d) of the Communications Act and Section 73.3540 of the rules (together, the "Unauthorized Transfer Rules") of the Federal Communications Commission ("FCC"), and all other applicable FCC regulations (collectively, the "Communications Laws"), Big Horn has developed and implemented a compliance plan ("Compliance Plan") consistent with the Appendix to the Consent Decree. The Compliance Plan includes the following components:

- **FCC Compliance Officer.** Big Horn designated the undersigned, a member of Big Horn Media, Inc.'s board of directors, to serve as its FCC Compliance Officer ("Compliance Officer"). The Compliance Officer is responsible for ensuring that the Company complies with the Compliance Plan, observes the Communications Laws, and executes the operating procedures necessary to ensure compliance with the Communications Laws. In addition, the Compliance Officer is responsible for ensuring that the Compliance Plan remains up to date.
- **Compliance Manual.** Big Horn has developed a Compliance Manual that explains the Communications Laws that apply to Big Horn, including the Unauthorized Transfer Rules. The Compliance Manual also sets forth the operating procedures ("Operating Procedures") that all employees and agents of the Company who perform duties, or who supervise, oversee, or manage the performance of duties, that relate to the Company's responsibilities under the Communications Laws ("Covered Employees") must follow to ensure compliance with these requirements. In particular, the Operating Procedures are designed to ensure compliance with the Unauthorized Transfer Rules, and include a checklist describing specific steps that Covered Employees must follow to ensure compliance with these requirements. The Operating Procedures make clear that prior FCC approval must be sought before any transaction for the transfer of control of an FCC licensee or assignment of an FCC license can be consummated, and that the Compliance Officer will ensure that the proper FCC paperwork is filed in advance, and granted by the FCC, before any such transactions are consummated. A copy of the Compliance Manual has been distributed to all Covered Employees. Under the Compliance Plan, the Compliance Officer is required to coordinate with regulatory counsel at least once annually to update the Compliance Manual, as appropriate, to ensure that the information in it remains current and accurate.
- **Compliance Training Program.** Big Horn has established and completed a Compliance Training Program for Covered Employees to ensure compliance with the Compliance Manual and Operating Procedures. Big Horn also will ensure that any new employee who is a Covered Employee will be trained within the first sixty (60) days of employment. The Compliance Training Program tracks the Compliance Manual, and is focused on proper implementation thereof. Big Horn did not have any new employees in the preceding calendar year.

In addition to the foregoing description of the steps being taken by Big Horn to ensure compliance with the Communications Laws and the terms and conditions of the Consent Decree, attached hereto is the certification required pursuant to Section IV of the Appendix to the

Respectfully submitted,



John Burkavage  
FCC Compliance Officer  
Big Horn Media, Inc.

Attachment

cc: Christopher Clark, Audio Division

**CERTIFICATION**

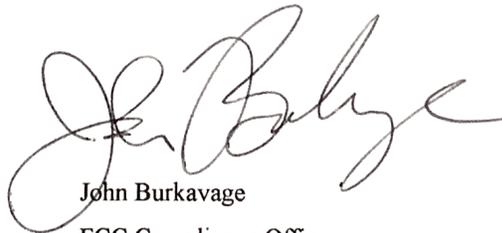
I, John Burkavage, serve as the FCC Compliance Officer for Big Horn Media, Inc. ("Big Horn").

As an agent of and on behalf of Big Horn, I have personal knowledge that Big Horn (1) has established operating procedures intended to ensure compliance with the terms and conditions of the Consent Decree and with section 310(d) of the Act and section 73.3540 of the Rules; (2) has been utilizing those procedures since implementation of the Compliance Manual; and (3) is not aware of any instances of non-compliance with the Consent Decree or those specified sections of the Act and Rules.

As the FCC Compliance Officer, I have personally overseen the development and implementation of the Compliance Plan. I have carefully reviewed the information and Operating Procedures contained in the Compliance Plan, reviewed the applicable regulatory obligations and Operating Procedures with regulatory counsel, undertaken training of Covered Employees, posted the comprehensive Compliance Plan on Big Horn's internal website, and overseen Big Horn's utilization of the Operating Procedures since implementation of the Compliance Plan. As Big Horn's FCC Compliance Officer, I am responsible for monitoring compliance with the terms and conditions of the Consent Decree and all applicable Communications Laws. All Covered Employees have been instructed to report any non-compliance to me to ensure that I am aware of any such noncompliance. Accordingly, I am not aware of any instances of non-compliance with the terms and conditions of the Consent Decree.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on September 17, 2021



John Burkavage  
FCC Compliance Officer  
Big Horn Media, Inc.