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November 24, 2021

VIA EMAIL

Robert Baker, Assistant Chief, Policy Division, Media Bureau
Gary Schonman, Special Counsel, Policy Division, Media Bureau
Sima Nilsson, Attorney-Advisor, Policy Division, Media Bureau
Federal Communications Commission
45 L Street, NE
Washington, DC 20554
Robert.Baker@fcc.gov
Gary.Schonman@fcc.gov
Sima.Nilsson@fcc.gov

**RE: *In the Matter of CD Broadcasting, Inc.*
File No. POL-070621-4770954
Compliance Report**

Dear Mr. Baker, Mr. Schonman, and Ms. Nilsson:

CD Broadcasting, Inc. (“Licensee”), licensee of Station KLMJ(FM) (Facility ID No. 25914) (the “Station”), by its undersigned counsel, hereby files this Compliance Report as set forth in the terms of the Consent Decree (DA 21-1212) (“Consent Decree”) adopted and released on September 28, 2021 (“Effective Date”) in the above-referenced proceeding. Capitalized terms used herein are intended to have the same meaning as they have been given in the Consent Decree. Licensee’s efforts to comply with the terms and conditions of the Consent Decree are set forth below.

1. **Compliance Officer.** On October 6, 2021, i.e., within thirty (30) calendar days after the Effective Date, Licensee designated Mandy Strother to serve as Compliance Officer, and to discharge the duties set forth in the Consent Decree.

2. **Compliance Manual.** As of October 19, 2021, i.e., within thirty (30) calendar days after the Effective Date, Licensee had developed and distributed a Compliance Manual to all Covered Employees. The Compliance Manual thoroughly explains the requirements embodied in the Political Record-keeping Statute and Rule. Furthermore, the Compliance Manual contains Operating Procedures that Covered Employees must follow to help ensure Licensee’s compliance with the Political Record-keeping Statute and Rule. Licensee’s Operating Procedures include internal procedures and policies specifically designed to ensure that Station KLMJ uploads all required information to the Station’s online political files in a timely manner

and otherwise maintains full, complete, and up to date information therein. Licensee's Operating Procedures also include a compliance checklist that describes the steps that a Covered Employee must follow to ensure compliance with the Political Record-keeping Statute and Rule. Licensee has adopted a policy that it shall periodically review the Compliance Manual as necessary to ensure that the information set forth therein remains current, complete, accurate, and effective.

3. **Compliance Training Program.** As of October 5, 2021, i.e., within thirty (30) calendar days after the Effective Date, Licensee established a Compliance Training Program to provide its Covered Employees with periodic training on compliance with the Political Record-keeping Statute and Rule. As part of the Compliance Training Program, Licensee has ensured that all Covered Employees shall be: (i) advised of Licensee's obligation to report any noncompliance with the Political Record-keeping Statute and Rule; and (ii) instructed on how to disclose noncompliance to the Compliance Officer.

On October 21, 2021, i.e., within thirty (30) calendar days after the Effective Date, all Covered Employees were trained pursuant to the Compliance Training Program. Furthermore, Licensee has adopted and implemented the following policies with respect to the Compliance Training Program: (i) any person who becomes a Covered Employee at any time after the initial Compliance Training Program shall be trained within thirty (30) calendar days after the date such person becomes a Covered Employee; (ii) Licensee shall repeat compliance training for all Covered Employees on an annual basis; and (iii) Licensee shall periodically review and revise the Compliance Training Program as necessary to ensure that it remains current, complete, and effective.

4. **Reporting Noncompliance.** Within ten (10) calendar days after discovery, Licensee will report any noncompliance with: (i) the Political Record-keeping Statute and Rule; and (ii) the terms and conditions of this Consent Decree. Licensee has implemented a policy that such reports include a detailed explanation of: (i) each instance of noncompliance; (ii) the steps that Licensee has taken or will take to address such noncompliance – including a schedule on which such actions will be taken; and (iii) the steps that Licensee has taken or will take to prevent the recurrence of any such noncompliance – including the schedule on which such preventative action will be taken. Licensee has implemented a policy that any reports of noncompliance shall be sent to the Political Programming staff within ten (10) calendar days of discovery of such noncompliance: Robert Baker, Assistant Chief, Policy Division, Media Bureau, Federal Communications Commission, at Robert.Baker@fcc.gov; Gary Schonman, Special Counsel, Policy Division, Media Bureau, Federal Communications Commission, at Gary.Schonman@fcc.gov; and Sima Nilsson, Attorney-Advisor, Policy Division Media Bureau, Federal Communications Commission, at Sima.Nilsson@fcc.gov.

To date, Licensee has not needed to execute its obligations pursuant to Paragraph 16 of the Consent Decree.

5. **Summary of Compliance Efforts.** Attached hereto is Licensee's Summary of Compliance Efforts, in the form of an Excel spreadsheet, which documents Station KLMJ's

efforts during the relevant reporting period (i.e., August 2, 2020 to November 2, 2020) to comply with the Political Record-keeping Statute and Rule and the Consent Decree.

The foregoing statements also serve as the explanation and basis for the Compliance Officer and the President's Certifications enclosed with this Compliance Report. Should you have any questions concerning this Compliance Report, please contact the undersigned counsel for Licensee.

Respectfully submitted,

/s/ Paul J. Feldman
Paul J. Feldman

Counsel for CD Broadcasting, Inc.

Enclosures