



North High School

Community High School District 99

Dr. Courtney DeMent Principal • Dr. Erin Ludwick Associate Principal • Keith Palz Associate Principal
Dr. Ken Sorensen Associate Principal • Kelly Zuerner Associate Principal

Alexander Sanjenis
Federal Communications Commission
45 L Street, NE
Washington, DC 20554
Alexander.Sanjenis@fcc.gov

**RE: In the Matter of WDGC-FM School District #99.
File No. 0000119955
NAL/Acct. No. MB-202141410059
Compliance Report**

Dear Mr. Sanjenis:

WDGC-FM School District #99 ("Licensee"), licensee of Station WDGC-FM, Downers Grove, Illinois (Fac. ID 59285), hereby files this Compliance Report as set forth in the terms of the Consent Decree (DA 21-1463) ("Consent Decree") adopted and released on November 22, 2021 ("Effective Date") in the above-referenced proceeding. Licensee's compliance with the terms and conditions of the Consent Decree are set forth below.

1. **EEO Report.** On November 17, 2021, a few days prior to the Effective Date, the Licensee filed its EEO program Report
2. **Compliance Officer.** As of December 1, 2021, within thirty (30) calendar days after the Effective Date, Licensee designated David Zarembka to serve as Compliance Officer, and to discharge the duties set forth in the Consent Decree.
3. **Compliance Manual.** As of December 1, 2021, within thirty (30) calendar days after the Effective Date, Licensee developed and distributed a Compliance Manual to all Covered Employees. The Compliance Manual thoroughly explains the Operating Procedures that Covered Employees must follow to help ensure Licensee's compliance with the silent notification rule (Section 73.561(d), the Ownership Report rule (Section 73.3615(d)), the EEO Program Report rule (Section 73.2080(f)(1)), and the Online Public Inspection File rule (Section 73.3527(b)(2)(i)). Licensee's Operating Procedures include internal procedures and policies specifically designed to ensure that all required documents are uploaded into the Station's online 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. 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.

4. **Compliance Training Program.** As of December 1, 2021, within thirty (30) calendar days after the Effective Date, Licensee conducted a Compliance Training Program to provide its Covered Employees with training in compliance with the Consent Decree. As part of the Compliance Training Program, Licensee ensured that all covered Employees shall be: (i) advised of Licensee's obligation to report any noncompliance with the rules; and (ii) instructed on how to disclose noncompliance to the Compliance Officer.

As of December 1, 2021, 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.

The foregoing statements as set forth in the Compliance Officer's Declaration, serve as the basis for this Compliance Report. Should you have any questions concerning this Compliance Report, please contact the undersigned for the Licensee.

Respectfully submitted,

David Zarembka

David A. Zarembka

Enclosure



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Dr. Ken Sorensen Associate Principal • Kelly Zuerner Associate Principal

Compliance Report Declaration

I, Ken Sorensen, Associate Principal at Downers Grove North High School School District #99, licensee of Station WDGC-FM, Downers Grove, Illinois, am providing this Declaration to the *Order and Consent Decree*, File No. 0000119955. I have reviewed the Compliance Report and based on my knowledge, I hereby certify that this Compliance Report does not contain any untrue statements of a material fact, does not omit to state a material fact necessary to make the statements made herein, and is not misleading with respect to the period covered by the Compliance Report. I hereby state under penalty of perjury that the foregoing is true complete and correct to the best of my knowledge and belief and is made in good faith.

December 1 , 2022

Ken Sorensen