

**Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
Attention: Barbara A. Kreisman Chief
Video Division
Media Bureau**

Submission Statement:Regarding 3 Angels Broadcasting

April 9, 2012

My name is Ken Orchard;

I have some personal knowledge of the facts related to the Sixteen Class A TV stations of the "Three Angels Broadcasting Network."

My Background:

With more than 50 years in this great industry, 20 years in Television engineering and another 20 years in radio in which I built 5 stations and operated them as owner, manager and engineer and then successfully sold my group.

After 2 days of retirement, I was called to help out a fellow broadcaster with a technical problem. I fixed his problem and then I asked him I needed to see something in his Public File.

What is a Public File? was his question to me.

I said it's a \$10,000 FCC fine if you don't have one.

Can you help me with this?

After owning stations this was not a problem. So I produced a great Public File in a few weeks.

His comment to me was, "Ken" you should forget this technical stuff and help stations with their FCC Compliance.

I became the inspector under the "Volunteer Inspection Program for the State of California and Hawaii. Over the next few years I inspected hundreds of stations.

One of my clients then added ownership to a station in another state.

That meant that he would have to join that State Association so he could have that station inspected under the Volunteer Program.

It's at that time that I wrote to the FCC in Washington to become a "Nationwide Inspector."

It's under that agreement with the FCC that I will now address the Three Angels Stations.

I was hired to inspect the Class A Station K21DO in Palm Springs, CA.

I inspected this station in September of 2006.

Here is Front Cover of that Inspection Report.

FCC INSPECTION REPORT

Alternative Broadcast Inspection Program

Date of Report September 21, 2006

STATION

K21DO

Palm Springs, California

FCC/ABIP Inspection Report from Ken Orchard

Date of Application:	September 1, 2006 + 150 Days
Date of Inspection:	September 7, 2006
Date of Completion:	Feb.1, 2007 (All corrective work must be completed with possible re-inspection by this date.)

Station Needs Corrective Measures

The following is a list of corrective measures that must be done by Feb. 1, 2007 to receive a "Pass" condition and receive your 3-Year "Certificate of Compliance."

Please read comments about inspection and view the pictures.

(Continued)

After Corrective Measures were made, a 3-Year Certificate was issued.



Years later in 2011, Three Angels contacted me again to see if I could inspect K21DO in Palm Springs again and other 15 Class A Television Stations that they own and operate for a total of 16 stations.

Three Angels sent me a check for 4 of the stations.

See Payment for 4 stations.

(Continue)

THREE ANGELS BROADCASTING NETWORK 05/05
P.O. BOX 220
3391 CHARLEY GOOD ROAD
WEST FRANKFORT, IL 62896

BANTERRA BANK
West Frankfort, IL 62896
70-2259/812

99312
March 23, 2011

PAY TO THE ORDER OF Orchard Media Services
*****2,000.00
**** TWO THOUSAND AND 0/100 DOLLARS

Orchard Media Services
16435 Wimbledon Dr
Victorville, CA

MEMO Broadcast Station inspections

⑈099312⑈ ⑆081222593⑆ ⑈642 288 8⑈

THREE ANGELS BROADCASTING NETWORK 99312

Document No.	Document Date	Description	Amount	Discount	Net Amount
2444	03/17/11	Orchard Media Services Invoice PI0059514	2,000.00		2,000.00
			Total		2,000.00

Three Angels sent myself payment and along with their applications.

During the month of April of 2011 I drove to Palm Springs, CA and then to Las Vegas, NV.

Then to Bakersfield and Fresno.

I met with the Station Managers and the engineer from Three Angels Network from of their Corporation in Illinois.

With some minor corrections completed, their 3-year Certificates were issue in October 2011.

Health Problems came up and I did not get to visit the remaining 12 stations.

At about Oct. 2011 I was diagnosed with Prostate Cancer was scheduled to be operated.

That operation occurred in December 2011.

After a few months of recovery I am not ready to tackle the inspections of the other 12 Class A TV stations as outlined in your letter to Three Angels.

Because I got behind due to health issues I can now drive and set for long distance and would like to start, let's say June 1, 2012. It covers many states and would be about a 10,000 trip.

The project would take at least 6-9 months.

Three Angels is the second largest religious Broadcaster in the Nation.

I have gone over the Class A TV Broadcast Station Self- Inspection Checklist with their managers they are now more determined than ever to be in full FCC Compliance.

Three Angels also answers to another high calling when it comes to ethics and serving the communities of License.

I hereby respectfully submit this knowledge of the facts.

A handwritten signature in cursive script that reads "Kenneth B. Orchard". The signature is written in black ink and is positioned above the printed name.

Ken Orchard

Orchard Media Services (OMS) Ken or Kelly
760-243-4733 (Los Angeles)
FCC Alternative Broadcast Inspection Program (ABIP)

BROADCAST STATION INSPECTION APPLICATION

By signing this form and enclosing a check for the designated amount, we hereby request an inspection under the FCC Alternative Broadcast Inspection Program.

Call Letters of Station: K21DO Frequency _____ Type of Station: AM / FM / TV XX

Community of License Palm Springs, CA

Company Name: Three Angels Broadcasting Network

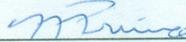
General Manager: Moses Primo Engineer: Dan Peek

Station Address: 3391 Charley Good Road

City, State, and Zip : West Frankfort, IL 62896

Phone: 618 627-4651 Fax: 618 627 4155

Web address: _____ Email: dan.peek@3abn.org

Authorized Party: Moses Primo 

Schedule of Fees

\$500 per station (Payable in advance) Travel expenses to be invoiced separately.

Orchard Media Services is the contract compliance specialist designated by the FCC to arrange inspections in all 50 states, districts, territories, and possessions of the United States of America.

Orchard Media Services shall conduct a standard FCC Enforcement Bureau full station inspection to all radio and television broadcast stations whether full power or low power.

It is understood that the OMS assume no responsibility, either expressed or implied, as to the absolute compliance with FCC Rules and Regulations.

If the station does not pass, the re-inspection fee will not exceed \$500 + travel expenses.
All expenses must be paid prior to receiving your stations 3-Year Certificate of Compliance.

(Check the Plan you wish to participate in)

PLAN A I understand OMS will notify the FCC of my participation in the ABIP and I will have a five (5) month window from the date of application to schedule and complete the station inspection to become FCC Compliant. The FCC agrees not to inspect this station during this 5-month period and for three (3) years upon issuing your Certificate of Compliance.

PLAN B I understand OMS will not notify the FCC and I will not be protected from any FCC inspection during the inspection period. Completion of station inspection and certification must be completed within 10 months of date of application. If I am not FCC compliant after this window of time, I will have to re-submit fee and application.

(For Plan A: Keep a copy of your Check & Application to present to the FCC should they attempt to conduct a station inspection before the FCC field office has processed the notification and listed the station as inspection exempt)

Complete this application (one per station) + check and sent to the following address.

(To be filled out by Orchard Media)

Send Application and fee to:
Orchard Media Services
16435 Wimbledon Drive
Victorville, Ca. 92395
Attention: Ken Orchard
760-243-4733 (Los Angeles)
E-mail: pifile@aol.com

Date of Application: April 1 - 2011
Date of Inspection: APRIL 03 - 2011
Date of Completion: OCT 1 - 2011

Application to inspect K21DO in Palm Springs, CA

FCC-ABIP

FCC
Federal
Communications
Commission

ENFORCEMENT
BUREAU

Oct. 1, 2011 - Oct. 1, 2014

K21DO

Palm Springs, CA

FCC Facility ID # 87108

This is to Certify that this station
has been found in compliance with the
requirements of the FCC's:
"Alternative Broadcast Inspection Program"

Kenneth B. Orchard

Orchard Media Services 760-243-4733

3-Year Certificate issued for K21DO Palm Springs, CA

Orchard Media Services (OMS) Ken or Kelly
760-243-4733 (Los Angeles)
FCC Alternative Broadcast Inspection Program (ABIP)

BROADCAST STATION INSPECTION APPLICATION

By signing this form and enclosing a check for the designated amount, we hereby request an inspection under the FCC Alternative Broadcast Inspection Program.

Call Letters of Station: K43FO Frequency _____ Type of Station: AM / FM / TV XX

Community of License Las Vegas, NV

Company Name: Three Angels Broadcasting Network

General Manager: Moses Primo Engineer: Dan Peek

Station Address: 3391 Charley Good Road

City, State, and Zip: West Frankfort, IL 62896

Phone: 618 627-4651 Fax: 618 627 4155

Web address: _____ Email: dan.peek@3abn.org

Authorized Party: Moses Primo *M. Primo*

Schedule of Fees

\$500 per station (Payable in advance) Travel expenses to be invoiced separately.

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Orchard Media Services shall conduct a standard FCC Enforcement Bureau full station inspection to all radio and television broadcast stations whether full power or low power.

It is understood that the OMS assume no responsibility, either expressed or implied, as to the absolute compliance with FCC Rules and Regulations.

If the station does not pass, the re-inspection fee will not exceed \$500 + travel expenses.
All expenses must be paid prior to receiving your stations 3-Year Certificate of Compliance.

(Check the Plan you wish to participate in)

- PLAN A** I understand OMS will notify the FCC of my participation in the ABIP and I will have a five (5) month window from the date of application to schedule and complete the station inspection to become FCC Compliant. The FCC agrees not to inspect this station during this 5-month period and for three (3) years upon issuing your Certificate of Compliance.
- PLAN B** I understand OMS will not notify the FCC and I will not be protected from any FCC inspection during the inspection period. Completion of station inspection and certification must be completed within 10 months of date of application. If I am not FCC complaint after this window of time, I will have to re-submit fee and application.

(For Plan A: Keep a copy of your Check & Application to present to the FCC should they attempt to conduct a station inspection before the FCC field office has processed the notification and listed the station as inspection exempt)

Complete this application (one per station) + check and sent to the following address.

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Orchard Media Services
16435 Wimbledon Drive
Victorville, Ca. 92395
Attention: Ken Orchard
760-243-4733 (Los Angeles)
E-mail: pifile@aol.com

Date of Application: April 1-2011
Date of Inspection: April 13-2011
Date of Completion: April
Oct 1-2011

Application to Inspect K43FO in Las Vegas, NV

FCC-ABIP



ENFORCEMENT
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Oct. 1, 2011 - Oct. 1, 2014

K43FO

Las Vegas, NV

FCC Facility ID # 14302

This is to Certify that this station
has been found in compliance with the
requirements of the FCC's:
"Alternative Broadcast Inspection Program"

Kenneth B. Orchard

Orchard Media Services 760-243-4733

3-Year Certificate issued for K43FO in Las Vegas, NV

Application

Orchard Media Services (OMS) Ken or Kelly
760-243-4733 (Los Angeles)
FCC Alternative Broadcast Inspection Program (ABIP)

BROADCAST STATION INSPECTION APPLICATION

By signing this form and enclosing a check for the designated amount, we hereby request an inspection under the FCC Alternative Broadcast Inspection Program.

Call Letters of Station: K08MM Frequency _____ Type of Station: **AM** / **FM** / **TV XX**

Community of License Bakersfield, CA

Company Name: Three Angels Broadcasting Network

General Manager: Moses Primo Engineer: Dan Peek

Station Address: 3391 Charley Good Road

City, State, and Zip : West Frankfort, IL 62896

Phone: 618 627-4651 Fax: 618 627 4155

Web address: _____ Email: dan.peek@3abn.org

Authorized Party: Moses Primo *M. Primo*

Schedule of Fees

\$500 per station (Payable in advance) Travel expenses to be invoiced separately.

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Orchard Media Services shall conduct a standard FCC Enforcement Bureau full station inspection to all radio and television broadcast stations whether full power or low power.

It is understood that the OMS assume no responsibility, either expressed or implied, as to the absolute compliance with FCC Rules and Regulations.

If the station does not pass, the re-inspection fee will not exceed \$500 + travel expenses.
All expenses must be paid prior to receiving your stations 3-Year Certificate of Compliance.

(Check the Plan you wish to participate in)

PLAN A I understand OMS will notify the FCC of my participation in the ABIP and I will have a five (5) month window from the date of application to schedule and complete the station inspection to become FCC Compliant. The FCC agrees not to inspect this station during this 5-month period and for three (3) years upon issuing your Certificate of Compliance.

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(For Plan A: Keep a copy of your Check & Application to present to the FCC should they attempt to conduct a station inspection before the FCC field office has processed the notification and listed the station as inspection exempt)

Complete this application (one per station) + check and sent to the following address.

(To be filled out by Orchard Media)

<p style="text-align: center;">Send Application and fee to:</p> <p>Orchard Media Services 16435 Wimbledon Drive Victorville, Ca. 92395</p>	<p>Attention: Ken Orchard 760-243-4733 (Los Angeles) E-mail: pifile@aol.com</p>
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<p>Date of Application: <u> April 1 - 2011 </u> Date of Inspection: <u> APRIL 20 - 2011 </u> Date of Completion: <u> Oct 1 - 2011 </u></p>	
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Application to Inspect K08MM Bakersfield, CA

FCC-ABIP

FCC Federal Communications Commission

ENFORCEMENT BUREAU

Oct. 1, 2011 - Oct. 1, 2014

K08MM

Bakersfield, CA

FCC Facility ID # 57456

This is to Certify that this station
has been found in compliance with the
requirements of the FCC's:
"Alternative Broadcast Inspection Program"

Kenneth B. Orchard

Orchard Media Services 760-243-4733

3-Year Certificate issued for K08MM Bakersfield, CA

Orchard Media Services (OMS) Ken or Kelly
760-243-4733 (Los Angeles)
FCC Alternative Broadcast Inspection Program (ABIP)

BROADCAST STATION INSPECTION APPLICATION

By signing this form and enclosing a check for the designated amount, we hereby request an inspection under the FCC Alternative Broadcast Inspection Program.

Call Letters of Station: K12OZ Frequency _____ Type of Station: AM / FM / TV XX

Community of License Fresno, CA

Company Name: Three Angels Broadcasting Network

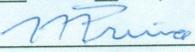
General Manager: Moses Primo Engineer: Dan Peek

Station Address: 3391 Charley Good Road

City, State, and Zip : West Frankfort, IL 62896

Phone: 618 627-4651 Fax: 618 627 4155

Web address: _____ Email: dan.peek@3abn.org

Authorized Party: Moses Primo 

Schedule of Fees

\$500 per station (Payable in advance) Travel expenses to be invoiced separately.

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Orchard Media Services
16435 Wimbledon Drive
Victorville, Ca. 92395
Attention: Ken Orchard
760-243-4733 (Los Angeles)
E-mail: pifile@aol.com

Date of Application: April 1 - 2011
Date of Inspection: April 20 2011
Date of Completion: Oct 1 2011

Application to inspect K12OZ Fresno, CA.

FCC-ABIP

FCC Federal Communications Commission

ENFORCEMENT BUREAU

Oct. 1, 2011 - Oct. 1, 2014

K12OZ

Fresno, CA

FCC Facility ID # 57456

This is to Certify that this station
has been found in compliance with the
requirements of the FCC's:
"Alternative Broadcast Inspection Program"

Kenneth B. Orchard

Orchard Media Services 760-243-4733

3-Year Certificate issued for K12OZ Fresno, CA.

End of E-Mail.