

## Response of Campbellsville University

Campbellsville University, licensee of Class A television station WLCU-CA, Campbellsville, Kentucky, hereby responds to the March 12, 2013 letter from Hossein Hashemzadeh, Deputy Chief, Video Division, Media Bureau, directing the station to upload its main studio address and quarterly issues programs lists to the online public inspection file, and respond to the Commission as to whether the station has been on the air for an average of 18 hours per day, aired at least three hours per week of locally produced programming, and complied with the technical requirements of its authorization.

As the licensee recently explained in the pending license renewal application for the station, as a Christian institution of higher education, Campbellsville University has long operated WLCU-CA in furtherance of its mission to support students and viewers in life-long learning; active participation in a diverse, global society; and developing the qualities of Christian servant-leaders. To those ends, the station airs a significant amount of public affairs, educational, and religious programming. For example, the station's long-running program, Dialog on Public Issues, frequently contains long-form interviews with local, state, national and international elected officials, and is taped weekly, then rebroadcast in various timeslots throughout the week. The University also provides valuable academic instruction to the community by airing many important classroom lectures and talks put on at the University, so that the entire community can benefit from them. The University has also invigorated its Journalism program using the facilities of the station as a laboratory for students to learn about the broadcasting craft. Students also learn to help churches broadcast their religious services, and participate in airing of Wednesday services from the University's chapel.

The University employs a professional Director of Broadcast Services who is a veteran broadcaster with many years of experience owning and operating commercial radio stations. As such, he is very knowledgeable about the technical aspects of the station's operation as well as its substantive public interest requirements. However, given the University's unique position as a religiously-affiliated educational institution, and the differences between the rules affecting the University's NCE FM station and its Class A station, some public file documentation was not prepared and/or uploaded to the online public inspection file by the February 4, 2013 due date.

Specifically, with regard to quarterly issues/programs lists, the station maintains a recording of each episode of its public affairs programs available on disk at the station's main studio, along with a listing of each episode's guest(s) and the list of questions prepared for the host to ask the guest(s). In addition, approximately six months' worth of recordings are available for streaming on the station's website. Thus, the station did not previously prepare a separate quarterly issues/programs list which would be conducive to uploading to the FCC's online public file. In addition, inasmuch as the station does not insert any commercials into children's programming and receives from its program suppliers documentation of their compliance with the commercial limits, the station did not prepare and upload additional certifications for the public file attesting to those facts.

The station has created a form to capture the quarterly evidence of the issue-responsive programming that the station aired during the preceding quarter (and continues to maintain recordings of at its main studio), which form is more conducive to uploading to the new online

public file. The station has incorporated the information about its public affairs programming that aired during the current license term into the form and has uploaded the forms to the online public inspection file. In addition, the station has created quarterly certifications as to its compliance with the commercial limits in children's programming and continuing eligibility for Class A status, and these have also been posted.

The station has uploaded its main studio street address and is reviewing the online public file to remove any electronically filed forms that are past their retention period. In so doing, the licensee noticed that there appeared to be no Form 398 for the Fourth Quarters of 2008 and 2009, and that the one for First Quarter 2011 was filed at the time that First Quarter 2012 was due, but that there was no filing for Quarter 2012 at that time. Upon further review, it appears that the form for the First Quarter of 2011 was filed on June 14, 2011, but subsequently saved over with the form for the First Quarter of 2012 due to an error in pulling down the year from the electronic system's pull down menu. Accordingly, both forms are being re-created for filing with a 2013 file date. The forms for Fourth Quarter 2008 and 2009 have also been re-created and filed with 2013 dates.

In summary, station WLCU-CA has operated an average of 18 hours per day, aired an average of at least three hours per week of locally produced programming, maintained a main studio, and complied with the technical aspects of its authorization since receiving its Class A authorization. The station has aired issue responsive programming and children's educational programming and retained evidence of airing that programming at its main studio. The station has converted that evidence to a form that can be uploaded to the station's online public inspection file and done so, as well as having created and uploaded certifications demonstrating continuing Class A eligibility and commercial limits compliance. Finally, the station has uploaded its main studio address.

I hereby certify that the foregoing is true and correct to the best of my knowledge, information and belief.

Respectfully submitted,

/s/

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Dr. Keith Spears  
Vice President of Regional and  
Professional Education

Dated: April 8, 2013