

# STAMP AND RETURN

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March 26, 2014

Accepted/Filed

MAR 26 2014

FCC Office of the Secretary

**BY HAND DELIVERY**

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

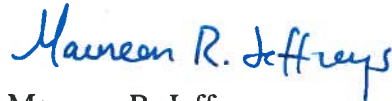
**Re: *KCETLink, FRN: 0001529213, Facility ID No.: 13058,  
File No.: EB-10-LA-0214, NAL/Account Number: 201132900003  
Submission of Second Compliance Report***

Dear Ms. Dortch:

On behalf of KCETLink, licensee of noncommercial educational station KCET, attached is a copy of KCET's second compliance report pursuant to the terms of the March 28, 2013 Consent Decree (DA 13-556). This report is being sent today via Federal Express to the FCC Enforcement Bureau, Western Region, Los Angeles Office, 18000 Studebaker Road, #660, Cerritos, California 90703.

Please let me know if you have any questions.

Sincerely,



Maureen R. Jeffreys  
Counsel for KCETLink

Enclosure

**VIA FEDERAL EXPRESS**

March 26, 2014

Federal Communications Commission  
Enforcement Bureau  
Western Region, Los Angeles Office  
18000 Studebaker Road, #660  
Cerritos, California, 90703

Re: KCETLink, FRN 0001529213, Second Compliance Report Pursuant to Consent Decree dated March 28, 2013 (DA 13-556), File No. EB-10-LA-0214, NAL/Acct. No. 201132900003

To Whom It May Concern:

On March 28, 2013, the FCC released a consent decree in connection with an alleged violation by KCETLink of the FCC's public file rules ("Rules"), 47 C.F.R. § 73.3527 of the Communications Act of 1934 (the "Consent Decree"). The Consent Decree terminated the investigation and ordered KCETLink to implement a Compliance Plan in connection with the decree.<sup>1</sup> This letter serves as the second Compliance Report pursuant to the terms of the Consent Decree.

The Consent Decree requires the following:

- the designation of a Compliance Officer within 30 days;
- the creation of Operating Procedures to ensure compliance with the Rules set forth in 47 C.F.R. § 73.3527 within 60 days;<sup>2</sup>
- the creation of a Compliance Checklist to explain the Rules and to set forth the Operating Procedures for Covered Employees within 60 days;
- the creation of a Compliance Manual explaining the Rules and setting forth the Operating Procedures that Covered Employees must follow within 60 days;
- the establishment and implementation of a Compliance Training Program in compliance with the Rules and the Operating Procedures within 60 days; and
- the submission of three Compliance Reports: 90 days, 12 months, and 24 months.

<sup>1</sup> Capitalized terms in this report have the same meaning as in the Consent Decree.

<sup>2</sup> The time periods in this section are in relation to the Effective Date of the Consent Decree, March 28, 2013.

As reported in the first compliance report dated June 25, 2013, KCETLink has undertaken several steps to comply with the terms and conditions of the Consent Decree. These include the following actions.

On or before April 27, 2013, KCETLink made a voluntary contribution in the amount of \$6,000 as required by ¶ 14 of the Consent Decree.

On or before April 27, 2013, KCETLink designated June M. Baldwin, Esq. as the Compliance Officer as required by ¶ 8 of the Consent Decree.

On or before May 28, 2013, KCETLink developed and implemented a written Compliance Plan, including Operating Procedures, Compliance Plan, and Compliance Checklist, and distributed the Compliance Manual to all Covered Employees as required by ¶ 9 of the Consent Decree.

On May 28, 2013, and again on June 5, 2013, Ms. Baldwin conducted a one (1) hour Compliance Training Program for the Covered Employees as required by ¶ 9 of the Consent Decree. KCETLink will repeat the compliance training program on an annual basis, and the next training is scheduled for April 22, 2014.

In connection with preparation of this report, Ms. Baldwin has reviewed the Compliance Manual and Compliance Training Materials to ensure that the information set forth therein remains current and complete.

On or before March 28, 2015, KCETLink will submit a third Compliance Report, as required by ¶ 11 of the Consent Decree.

Please also see the Certification of Compliance attached hereto as Exhibit "A" and incorporated herein by this reference.

Respectfully submitted,



June M. Baldwin, Esq.  
Senior Vice President, General Counsel  
Corporate and Legal Affairs  
KCETLink

Attachment

cc: Marlene H. Dortch, Esq., Secretary  
WR-RESPONSE@fcc.gov (via electronic mail)

EXHIBIT "A"

CERTIFICATION OF COMPLIANCE

I, June M. Baldwin, Compliance Officer, as an agent and on behalf of KCETLink, do hereby state that I have personal knowledge that KCETLink: (i) has established and implemented the Compliance Plan; (ii) has utilized the Operating Procedures since the implementation of the Compliance Plan; and (iii) am not aware of any instance of noncompliance with the terms and conditions of this Consent Decree, including the reporting obligations set forth in paragraph 10 of the Consent Decree.

I hereby certify under penalty of perjury that the information contained in this Compliance Report is true and correct to the best of my knowledge, information and belief.

Executed on March 26, 2014

A handwritten signature in blue ink, appearing to read "June M. Baldwin".

June M. Baldwin, Esq.