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September 24, 2008

VIA FCC COURIER

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554
Attention Spectrum Enforcement Division, Enforcement Bureau

Re: File No. EB-08-SE-771

Dear Ms. Dortch

Submitted on behalf of the Los Angeles Unified School District, licensee of noncommercial educational television broadcast station KLCS, Los Angeles, California, is the Licensees response to the above-captioned Enforcement Bureau request for information, dated September 15, 2008, consisting of the following:

1. Statement under penalty of perjury of Dr. Janalyn W. Glymph; and
2. Statement under penalty of perjury of Thomas J. Taitt.

Any questions concerning this matter should be addressed to undersigned counsel.

Very truly yours,



Richard A. Helmick

cc: Ms. Linda M. Nagel (FCC, Room 3-A440)
Mr. Ricardo M. Durham (FCC, Room 3-C460)

Statement Under Penalty of Perjury

My name is Thomas Taitt, and I am employed as an Administrative Analyst for Station KLCS, Los Angeles, California which is licensed to and operated by the Los Angeles Unified School District ("LAUSD"). I have served in this capacity since March 19, 2008. As Station KLCS' Administrative Analyst, I am responsible for the timely filing and reporting of various matters to the Federal Communications Commission, (FCC), Public File, Member Services, Order Processing and LAUSD District Rule Compliance.

As directed by Dr. Janalyn W. Glymph, General Manager of Station KLCS, I prepared and submitted the FCC Form 388 DTV Quarterly Activity Station Report (BDERT-20080711AEE) in a timely manner. For the period May 1, 2008 through and including June 30, 2008, Station KLCS aired at least 120 seconds per day of DTV transition consumer education PSAs on a total of 43 days; however, the Station did fail to air the minimum required amount of PSAs on 18 days during this period.

On March 28, 2008 an e-mail was sent from the Director of Programming & Operations to the Multicast Traffic Coordinator responsible for scheduling the DTV Consumer Education spots. The e-mail quoted FCC Form 388 regarding the minimum daily and monthly requirements for DTV Consumer Education. The DTV spots began running on March 25, 2008.

On or about July 2, 2008, in the duties of my Administrative Analyst Position, I began preparing FCC Form 388 – DTV Quarterly Activity Station Report for the


second quarter (April – June 2008). Upon review of the station logs (Attachment 1), it became evident that while all daily and monthly minimum time requirements were not only reached but were far exceeded in the month of April, there were shortfalls between May 1, 2008 and July 1, 2008 in meeting the two minute daily minimum broadcast requirement. Upon further investigation I found that the Multicast Traffic Coordinator assigned to place the DTV Consumer Education spots either missed and/or misunderstood the required increase in airtime starting on May 1, 2008. The reason why Station KLCS failed to air the required amount of PSAs was human error.

Immediately upon finding the error, a meeting took place with the Director of Programming & Operations, who is responsible for overseeing that the logs are prepared in compliance with FCC regulations, the Multicast Traffic Coordinator who prepares the logs, and me, the Administrative Analyst responsible for reporting to the FCC. All FCC requirements were revisited and a system of safeguards was put into place to insure future compliance.

Under the new procedure, the Director of Programming and Operations and I, the Administrative Analyst are provided broadcast logs prior to broadcast. I log all DTV Consumer Education spots prior to air and confirm that minimum requirements are scheduled. The day after broadcast, I review that each of the spots actually aired. Since the implementation of the new safeguards, there have been no failures regarding the minimum requirements of DTV Consumer Education. Unfortunately, however the error was found on July 2, 2008 which means Station KLCS will also be in violation for one day of the third quarter of 2008 due to the single, July 1, 2008 shortfall.

Following this statement is a single Attachment. Attachment I is a list of all 30 second, 1 minute and 30 minute DTV transition consumer education PSAs broadcast on Station KLCS between April 1, 2008 and July 1, 2008. As KLCS' Administrative Analyst, I and others on the staff of Station KLCS have assisted and worked directly in the preparation of this information. I have reviewed the response and the information in the attachment, and the statements in them are true and correct to the best of my knowledge, information and belief.

Executed under penalty of perjury this 24th day of September, 2008.



Thomas J. Taitt

ATTACHMENT I

KLCS-TV

Report date: 09/23/2008
 Log Performance Report (PRM)
 Report time: 09:05:04
 Page: 1

From: 04/01/2008 To: 07/01/2008

Search Criteria: ITEM TITLE: *DTV*

Video Source	CART	Title	Length
Available	Notes		
Audio Source	Tape/Cut	Type	Sub-Title
From/To	DAYS		
DTV-2009-2		PR DTV 2009 PBS SPOT 1-MIN	01:00:06
03/23/08	SMTWTFS		
DTV-2009-2	2009/02		
02/20/09	YYYYYYY		
Sat	04/05/2008 at 21:51:51:10	for 00:01:00:06	0
Wed	04/09/2008 at 06:28:26:15	for 00:01:00:06	0
Wed	04/09/2008 at 10:58:56:09	for 00:01:00:06	0
Thu	04/10/2008 at 09:58:46:18	for 00:01:00:06	0
Thu	04/10/2008 at 10:57:50:05	for 00:01:00:06	0
Thu	04/10/2008 at 22:58:29:12	for 00:01:00:06	0
Fri	04/11/2008 at 13:58:46:11	for 00:01:00:06	0
Mon	04/14/2008 at 09:58:46:08	for 00:01:00:06	0
Tue	04/15/2008 at 09:58:46:18	for 00:01:00:06	0
Sat	04/19/2008 at 21:51:31:11	for 00:01:00:06	0
Sat	04/26/2008 at 21:50:16:07	for 00:01:00:06	0
Wed	05/07/2008 at 19:57:28:24	for 00:01:00:06	0
Tue	05/13/2008 at 22:53:45:01	for 00:01:00:06	0
Tue	05/20/2008 at 20:51:30:01	for 00:01:00:06	0
Wed	05/21/2008 at 21:56:46:02	for 00:01:00:06	0
Sat	05/24/2008 at 08:58:46:20	for 00:01:00:06	0
Mon	05/26/2008 at 05:26:46:13	for 00:01:00:06	0
Tue	05/27/2008 at 00:56:48:00	for 00:01:00:06	0
Tue	05/27/2008 at 10:58:31:03	for 00:01:00:06	0
Wed	05/28/2008 at 00:56:48:00	for 00:01:00:06	0
Sun	06/01/2008 at 01:56:46:12	for 00:01:00:06	0
Mon	06/02/2008 at 01:55:42:07	for 00:01:00:06	0
Mon	06/02/2008 at 21:58:57:05	for 00:01:00:06	0
Wed	06/11/2008 at 21:55:17:08	for 00:01:00:06	0
Thu	06/12/2008 at 21:52:55:25	for 00:01:00:06	0
Fri	06/13/2008 at 01:26:46:14	for 00:01:00:06	0
Sat	06/14/2008 at 21:53:29:23	for 00:01:00:06	0
Sun	06/15/2008 at 00:56:46:17	for 00:01:00:06	0
Sun	06/15/2008 at 06:26:46:10	for 00:01:00:06	0
Sun	06/15/2008 at 21:26:46:12	for 00:01:00:06	0
Sun	06/15/2008 at 22:50:02:02	for 00:01:00:06	0
Tue	06/17/2008 at 21:54:03:10	for 00:01:00:06	0
Wed	06/18/2008 at 00:56:48:00	for 00:01:00:06	0
Wed	06/18/2008 at 21:55:22:21	for 00:01:00:06	0
Fri	06/20/2008 at 22:56:50:28	for 00:01:00:06	0
Sun	06/22/2008 at 22:55:57:15	for 00:01:00:06	0
Sun	06/29/2008 at 22:43:30:00	for 00:01:00:06	0

This item appeared 37 times between 04/01/2008 and 07/01/2008.

ATTACHMENT I

Video Source	CART	Title		Length
Available	Notes			
Audio Source	Tape/Cut	Type	Sub-Title	
From/To	DAYS			

DTV-2009-1		PR	DTV 2009 PBS SPOT 30-SEC	00:30:03
03/23/08	SMTWTFS			
DTV-2009-1	2009/01			
02/20/09	YYYYYYY			

Tue	04/01/2008	at 06:27:36:01	for 00:00:30:03	0
Tue	04/01/2008	at 19:27:46:09	for 00:00:30:03	0
Tue	04/01/2008	at 20:57:29:10	for 00:00:30:03	0
Wed	04/02/2008	at 01:28:57:15	for 00:00:30:03	0
Wed	04/02/2008	at 19:58:54:00	for 00:00:30:03	0
Wed	04/02/2008	at 21:58:08:21	for 00:00:30:03	0
Thu	04/03/2008	at 19:28:07:03	for 00:00:30:03	0
Thu	04/03/2008	at 21:58:15:22	for 00:00:30:03	0
Thu	04/03/2008	at 23:29:27:07	for 00:00:30:03	0
Fri	04/04/2008	at 05:28:16:23	for 00:00:30:03	0
Fri	04/04/2008	at 11:48:53:25	for 00:00:30:03	0
Fri	04/04/2008	at 18:59:27:03	for 00:00:30:03	0
Fri	04/04/2008	at 20:58:07:09	for 00:00:30:03	0
Fri	04/04/2008	at 21:59:29:01	for 00:00:30:03	0
Sat	04/05/2008	at 05:57:08:28	for 00:00:30:03	0
Sat	04/05/2008	at 10:56:34:00	for 00:00:30:03	0
Sat	04/05/2008	at 18:56:22:20	for 00:00:30:03	0
Sat	04/05/2008	at 20:28:07:07	for 00:00:30:03	0
Sun	04/06/2008	at 14:56:10:01	for 00:00:30:03	0
Sun	04/06/2008	at 20:57:49:17	for 00:00:30:03	0
Sun	04/06/2008	at 22:59:29:14	for 00:00:30:03	0
Mon	04/07/2008	at 05:57:35:16	for 00:00:30:03	0
Mon	04/07/2008	at 20:58:26:20	for 00:00:30:03	0
Mon	04/07/2008	at 22:56:42:10	for 00:00:30:03	0
Tue	04/08/2008	at 05:58:01:24	for 00:00:30:03	0
Tue	04/08/2008	at 18:59:26:24	for 00:00:30:03	0
Tue	04/08/2008	at 21:28:58:06	for 00:00:30:03	0
Wed	04/09/2008	at 11:44:47:25	for 00:00:30:03	0
Wed	04/09/2008	at 19:59:15:12	for 00:00:30:03	0
Wed	04/09/2008	at 20:59:03:02	for 00:00:30:03	0
Fri	04/11/2008	at 01:58:03:03	for 00:00:30:03	0
Fri	04/11/2008	at 19:57:56:05	for 00:00:30:03	0
Fri	04/11/2008	at 21:58:50:22	for 00:00:30:03	0
Fri	04/11/2008	at 23:29:16:09	for 00:00:30:03	0
Sat	04/12/2008	at 06:29:05:06	for 00:00:30:03	0
Sat	04/12/2008	at 08:59:29:19	for 00:00:30:03	0
Sat	04/12/2008	at 12:57:16:13	for 00:00:30:03	0
Sat	04/12/2008	at 16:27:06:14	for 00:00:30:03	0
Sat	04/12/2008	at 17:55:00:24	for 00:00:30:03	0
Sat	04/12/2008	at 20:27:16:11	for 00:00:30:03	0
Sat	04/12/2008	at 22:26:47:13	for 00:00:30:03	0
Sun	04/13/2008	at 20:56:15:00	for 00:00:30:03	0
Sun	04/13/2008	at 23:26:46:16	for 00:00:30:03	0
Mon	04/14/2008	at 06:26:46:04	for 00:00:30:03	0
Mon	04/14/2008	at 11:44:26:10	for 00:00:30:03	0

Mon	04/14/2008	at	19:28:09:04	for	00:00:30:03	0
Mon	04/14/2008	at	21:57:31:13	for	00:00:30:03	0
Mon	04/14/2008	at	22:56:47:06	for	00:00:30:03	0
Tue	04/15/2008	at	06:26:46:29	for	00:00:30:03	0
Tue	04/15/2008	at	16:58:20:00	for	00:00:30:03	0
Tue	04/15/2008	at	21:56:44:12	for	00:00:30:03	0
Wed	04/16/2008	at	05:28:26:07	for	00:00:30:03	0
Wed	04/16/2008	at	16:58:20:19	for	00:00:30:03	0
Wed	04/16/2008	at	19:56:34:29	for	00:00:30:03	0
Wed	04/16/2008	at	22:26:45:27	for	00:00:30:03	0
Thu	04/17/2008	at	05:56:45:10	for	00:00:30:03	0
Thu	04/17/2008	at	16:58:20:29	for	00:00:30:03	0
Thu	04/17/2008	at	18:59:16:24	for	00:00:30:03	0
Thu	04/17/2008	at	20:59:00:08	for	00:00:30:03	0
Thu	04/17/2008	at	23:26:46:29	for	00:00:30:03	0
Fri	04/18/2008	at	06:26:46:03	for	00:00:30:03	0
Fri	04/18/2008	at	19:26:46:12	for	00:00:30:03	0
Fri	04/18/2008	at	21:59:11:09	for	00:00:30:03	0
Sat	04/19/2008	at	05:56:46:09	for	00:00:30:03	0
Sat	04/19/2008	at	13:27:36:15	for	00:00:30:03	0
Sat	04/19/2008	at	18:57:36:00	for	00:00:30:03	0
Sat	04/19/2008	at	20:27:16:27	for	00:00:30:03	0
Sat	04/19/2008	at	23:59:06:08	for	00:00:30:03	0
Sun	04/20/2008	at	15:56:50:18	for	00:00:30:03	0
Sun	04/20/2008	at	16:56:48:15	for	00:00:30:03	0
Mon	04/21/2008	at	05:56:41:26	for	00:00:30:03	0
Mon	04/21/2008	at	19:27:25:05	for	00:00:30:03	0
Mon	04/21/2008	at	21:58:25:26	for	00:00:30:03	0
Mon	04/21/2008	at	23:26:47:21	for	00:00:30:03	0
Tue	04/22/2008	at	01:58:14:20	for	00:00:30:03	0
Tue	04/22/2008	at	05:56:46:00	for	00:00:30:03	0
Tue	04/22/2008	at	09:59:18:20	for	00:00:30:03	0
Tue	04/22/2008	at	19:56:53:08	for	00:00:30:03	0
Tue	04/22/2008	at	21:57:02:05	for	00:00:30:03	0
Tue	04/22/2008	at	23:28:56:23	for	00:00:30:03	0
Wed	04/23/2008	at	05:56:39:18	for	00:00:30:03	0
Wed	04/23/2008	at	19:58:14:19	for	00:00:30:03	0
Thu	04/24/2008	at	09:59:16:23	for	00:00:30:03	0
Thu	04/24/2008	at	19:28:16:18	for	00:00:30:03	0
Thu	04/24/2008	at	21:59:04:05	for	00:00:30:03	0
Thu	04/24/2008	at	23:26:46:08	for	00:00:30:03	0
Fri	04/25/2008	at	05:57:17:05	for	00:00:30:03	0
Fri	04/25/2008	at	19:27:46:20	for	00:00:30:03	0
Sat	04/26/2008	at	00:56:47:00	for	00:00:30:03	0
Sat	04/26/2008	at	05:56:46:18	for	00:00:30:03	0
Sat	04/26/2008	at	20:57:36:23	for	00:00:30:03	0
Sat	04/26/2008	at	22:56:23:18	for	00:00:30:03	0
Sun	04/27/2008	at	13:56:05:19	for	00:00:30:03	0
Sun	04/27/2008	at	16:56:46:24	for	00:00:30:03	0
Sun	04/27/2008	at	20:57:16:09	for	00:00:30:03	0
Sun	04/27/2008	at	21:58:27:18	for	00:00:30:03	0
Mon	04/28/2008	at	19:28:19:05	for	00:00:30:03	0
Mon	04/28/2008	at	20:58:27:06	for	00:00:30:03	0
Mon	04/28/2008	at	22:59:30:12	for	00:00:30:03	0
Tue	04/29/2008	at	19:57:22:08	for	00:00:30:03	0
Tue	04/29/2008	at	21:58:20:07	for	00:00:30:03	0
Tue	04/29/2008	at	23:26:46:12	for	00:00:30:03	0
Wed	04/30/2008	at	20:59:29:08	for	00:00:30:03	0
Wed	04/30/2008	at	21:59:26:27	for	00:00:30:03	0
Thu	05/01/2008	at	20:56:57:20	for	00:00:30:03	0
Thu	05/01/2008	at	22:56:46:00	for	00:00:30:03	0

Fri	05/02/2008	at 18:58:32:19	for 00:00:30:03	0
Fri	05/02/2008	at 19:57:53:21	for 00:00:30:03	0
Fri	05/02/2008	at 21:57:06:05	for 00:00:30:03	0
Sat	05/03/2008	at 00:59:28:19	for 00:00:30:03	0
Sat	05/03/2008	at 01:56:46:04	for 00:00:30:03	0
Sat	05/03/2008	at 05:28:00:00	for 00:00:30:03	0
Sat	05/03/2008	at 11:56:46:11	for 00:00:30:03	0
Sat	05/03/2008	at 14:29:27:04	for 00:00:30:03	0
Sat	05/03/2008	at 21:46:48:08	for 00:00:30:03	0
Sat	05/03/2008	at 22:26:39:12	for 00:00:30:03	0
Sun	05/04/2008	at 14:27:05:11	for 00:00:30:03	0
Sun	05/04/2008	at 17:57:16:16	for 00:00:30:03	0
Sun	05/04/2008	at 19:56:47:14	for 00:00:30:03	0
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Sun	05/04/2008	at 22:56:25:16	for 00:00:30:03	0
Mon	05/05/2008	at 18:58:46:11	for 00:00:30:03	0
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Tue	05/06/2008	at 20:56:44:15	for 00:00:30:03	0
Tue	05/06/2008	at 22:53:08:26	for 00:00:30:03	0
Tue	05/06/2008	at 23:56:46:00	for 00:00:30:03	0
Wed	05/07/2008	at 10:59:17:10	for 00:00:30:03	0
Wed	05/07/2008	at 21:59:29:16	for 00:00:30:03	0
Thu	05/08/2008	at 05:56:49:19	for 00:00:30:03	0
Thu	05/08/2008	at 20:57:18:12	for 00:00:30:03	0
Thu	05/08/2008	at 22:59:29:26	for 00:00:30:03	0
Thu	05/08/2008	at 23:26:20:23	for 00:00:30:03	0
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Sat	05/10/2008	at 08:59:16:25	for 00:00:30:03	0
Sat	05/10/2008	at 12:27:16:06	for 00:00:30:03	0
Sat	05/10/2008	at 19:57:16:06	for 00:00:30:03	0
Sat	05/10/2008	at 20:56:35:13	for 00:00:30:03	0
Sat	05/10/2008	at 21:49:00:02	for 00:00:30:03	0
Sat	05/10/2008	at 23:59:19:23	for 00:00:30:03	0
Sun	05/11/2008	at 07:58:29:18	for 00:00:30:03	0
Sun	05/11/2008	at 14:57:10:29	for 00:00:30:03	0
Sun	05/11/2008	at 15:57:18:25	for 00:00:30:03	0
Sun	05/11/2008	at 17:56:48:16	for 00:00:30:03	0
Sun	05/11/2008	at 19:57:28:16	for 00:00:30:03	0
Sun	05/11/2008	at 23:26:46:19	for 00:00:30:03	0
Mon	05/12/2008	at 06:26:46:04	for 00:00:30:03	0
Mon	05/12/2008	at 18:59:16:10	for 00:00:30:03	0
Mon	05/12/2008	at 19:57:23:19	for 00:00:30:03	0
Mon	05/12/2008	at 21:58:43:16	for 00:00:30:03	0
Mon	05/12/2008	at 23:26:46:14	for 00:00:30:03	0
Tue	05/13/2008	at 01:26:46:03	for 00:00:30:03	0
Tue	05/13/2008	at 06:26:48:01	for 00:00:30:03	0
Tue	05/13/2008	at 21:57:16:09	for 00:00:30:03	0
Wed	05/14/2008	at 05:26:46:15	for 00:00:30:03	0
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Fri	05/16/2008	at	01:58:06:22	for	00:00:30:03	0
Fri	05/16/2008	at	05:56:55:22	for	00:00:30:03	0
Fri	05/16/2008	at	13:59:16:15	for	00:00:30:03	0
Fri	05/16/2008	at	19:26:46:10	for	00:00:30:03	0
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Sun	05/18/2008	at	00:56:46:11	for	00:00:30:03	0
Sun	05/18/2008	at	19:57:06:04	for	00:00:30:03	0
Sun	05/18/2008	at	21:28:56:25	for	00:00:30:03	0
Sun	05/18/2008	at	23:58:00:01	for	00:00:30:03	0
Mon	05/19/2008	at	04:57:48:00	for	00:00:30:03	0
Mon	05/19/2008	at	05:56:36:21	for	00:00:30:03	0
Mon	05/19/2008	at	19:25:50:13	for	00:00:30:03	0
Mon	05/19/2008	at	20:57:06:11	for	00:00:30:03	0
Mon	05/19/2008	at	22:56:46:03	for	00:00:30:03	0
Mon	05/19/2008	at	23:56:46:00	for	00:00:30:03	0
Tue	05/20/2008	at	01:26:46:10	for	00:00:30:03	0
Tue	05/20/2008	at	04:59:20:24	for	00:00:30:03	0
Tue	05/20/2008	at	06:27:37:24	for	00:00:30:03	0
Tue	05/20/2008	at	19:26:46:02	for	00:00:30:03	0
Wed	05/21/2008	at	05:26:46:12	for	00:00:30:03	0
Wed	05/21/2008	at	19:56:35:11	for	00:00:30:03	0
Thu	05/22/2008	at	05:26:46:12	for	00:00:30:03	0
Thu	05/22/2008	at	06:26:46:03	for	00:00:30:03	0
Thu	05/22/2008	at	19:26:46:05	for	00:00:30:03	0
Thu	05/22/2008	at	20:57:18:09	for	00:00:30:03	0
Fri	05/23/2008	at	04:59:21:09	for	00:00:30:03	0
Fri	05/23/2008	at	06:26:46:10	for	00:00:30:03	0
Fri	05/23/2008	at	23:26:46:06	for	00:00:30:03	0
Fri	05/23/2008	at	23:56:46:00	for	00:00:30:03	0
Sat	05/24/2008	at	05:27:51:10	for	00:00:30:03	0
Sat	05/24/2008	at	21:48:38:23	for	00:00:30:03	0
Sat	05/24/2008	at	22:26:46:04	for	00:00:30:03	0
Sat	05/24/2008	at	22:59:27:00	for	00:00:30:03	0
Sun	05/25/2008	at	20:58:09:14	for	00:00:30:03	0
Sun	05/25/2008	at	21:58:27:09	for	00:00:30:03	0
Mon	05/26/2008	at	06:26:46:08	for	00:00:30:03	0
Mon	05/26/2008	at	19:57:03:26	for	00:00:30:03	0
Mon	05/26/2008	at	21:59:28:29	for	00:00:30:03	0
Mon	05/26/2008	at	23:26:46:25	for	00:00:30:03	0
Tue	05/27/2008	at	01:56:46:02	for	00:00:30:03	0
Tue	05/27/2008	at	19:57:03:23	for	00:00:30:03	0
Tue	05/27/2008	at	21:56:44:11	for	00:00:30:03	0
Wed	05/28/2008	at	05:56:51:15	for	00:00:30:03	0
Wed	05/28/2008	at	19:28:30:11	for	00:00:30:03	0
Wed	05/28/2008	at	20:59:27:14	for	00:00:30:03	0
Wed	05/28/2008	at	21:59:05:28	for	00:00:30:03	0
Thu	05/29/2008	at	04:59:27:06	for	00:00:30:03	0
Thu	05/29/2008	at	19:26:46:03	for	00:00:30:03	0
Thu	05/29/2008	at	19:57:13:26	for	00:00:30:03	0
Thu	05/29/2008	at	22:56:41:11	for	00:00:30:03	0
Fri	05/30/2008	at	06:26:46:04	for	00:00:30:03	0
Sat	05/31/2008	at	21:49:26:11	for	00:00:30:03	0

Sat	05/31/2008	at 23:56:47:00	for 00:00:30:03	0
Sun	06/01/2008	at 05:26:46:26	for 00:00:30:03	0
Sun	06/01/2008	at 06:26:46:09	for 00:00:30:03	0
Sun	06/01/2008	at 14:59:23:22	for 00:00:30:03	0
Sun	06/01/2008	at 21:29:07:17	for 00:00:30:03	0
Sun	06/01/2008	at 21:59:28:12	for 00:00:30:03	0
Mon	06/02/2008	at 00:26:48:28	for 00:00:30:03	0
Mon	06/02/2008	at 05:26:46:03	for 00:00:30:03	0
Mon	06/02/2008	at 06:27:46:07	for 00:00:30:03	0
Mon	06/02/2008	at 23:27:36:15	for 00:00:30:03	0
Tue	06/03/2008	at 01:56:46:01	for 00:00:30:03	0
Tue	06/03/2008	at 06:27:46:08	for 00:00:30:03	0
Tue	06/03/2008	at 21:56:21:09	for 00:00:30:03	0
Tue	06/03/2008	at 22:58:42:17	for 00:00:30:03	0
Tue	06/03/2008	at 23:59:21:06	for 00:00:30:03	0
Wed	06/04/2008	at 04:53:57:02	for 00:00:30:03	0
Wed	06/04/2008	at 05:26:46:12	for 00:00:30:03	0
Wed	06/04/2008	at 19:29:20:10	for 00:00:30:03	0
Wed	06/04/2008	at 22:59:28:29	for 00:00:30:03	0
Thu	06/05/2008	at 05:57:36:21	for 00:00:30:03	0
Thu	06/05/2008	at 21:59:27:23	for 00:00:30:03	0
Thu	06/05/2008	at 23:29:26:25	for 00:00:30:03	0
Fri	06/06/2008	at 01:56:46:04	for 00:00:30:03	0
Fri	06/06/2008	at 18:58:46:12	for 00:00:30:03	0
Fri	06/06/2008	at 21:59:30:24	for 00:00:30:03	0
Fri	06/06/2008	at 22:58:43:08	for 00:00:30:03	0
Sat	06/07/2008	at 06:27:01:18	for 00:00:30:03	0
Sat	06/07/2008	at 11:56:46:10	for 00:00:30:03	0
Sat	06/07/2008	at 22:26:46:11	for 00:00:30:03	0
Sun	06/08/2008	at 16:56:26:12	for 00:00:30:03	0
Sun	06/08/2008	at 19:56:46:29	for 00:00:30:03	0
Sun	06/08/2008	at 21:59:27:15	for 00:00:30:03	0
Mon	06/09/2008	at 00:26:48:10	for 00:00:30:03	0
Mon	06/09/2008	at 04:57:48:00	for 00:00:30:03	0
Mon	06/09/2008	at 19:25:00:25	for 00:00:30:03	0
Mon	06/09/2008	at 22:56:46:27	for 00:00:30:03	0
Mon	06/09/2008	at 23:56:40:03	for 00:00:30:03	0
Tue	06/10/2008	at 01:26:46:04	for 00:00:30:03	0
Tue	06/10/2008	at 19:26:46:01	for 00:00:30:03	0
Tue	06/10/2008	at 21:29:01:22	for 00:00:30:03	0
Tue	06/10/2008	at 22:59:27:16	for 00:00:30:03	0
Wed	06/11/2008	at 00:57:18:04	for 00:00:30:03	0
Wed	06/11/2008	at 05:26:46:14	for 00:00:30:03	0
Thu	06/12/2008	at 06:26:46:16	for 00:00:30:03	0
Thu	06/12/2008	at 23:56:46:00	for 00:00:30:03	0
Fri	06/13/2008	at 05:26:46:12	for 00:00:30:03	0
Fri	06/13/2008	at 06:26:46:12	for 00:00:30:03	0
Fri	06/13/2008	at 19:29:27:12	for 00:00:30:03	0
Fri	06/13/2008	at 21:27:16:04	for 00:00:30:03	0
Fri	06/13/2008	at 22:59:27:02	for 00:00:30:03	0
Sat	06/14/2008	at 00:57:08:16	for 00:00:30:03	0
Sat	06/14/2008	at 01:55:38:21	for 00:00:30:03	0
Sat	06/14/2008	at 05:56:10:00	for 00:00:30:03	0
Sat	06/14/2008	at 11:26:58:27	for 00:00:30:03	0
Sat	06/14/2008	at 23:56:47:00	for 00:00:30:03	0
Mon	06/16/2008	at 06:26:46:07	for 00:00:30:03	0
Mon	06/16/2008	at 21:59:27:29	for 00:00:30:03	0
Wed	06/18/2008	at 01:56:32:13	for 00:00:30:03	0
Wed	06/18/2008	at 05:58:11:04	for 00:00:30:03	0
Thu	06/19/2008	at 18:58:46:11	for 00:00:30:03	0
Thu	06/19/2008	at 22:59:29:26	for 00:00:30:03	0

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Thu	06/19/2008	at	23:56:46:00	for	00:00:30:03	0
Fri	06/20/2008	at	00:56:48:00	for	00:00:30:03	0
Fri	06/20/2008	at	05:27:18:22	for	00:00:30:03	0
Fri	06/20/2008	at	13:58:46:19	for	00:00:30:03	0
Fri	06/20/2008	at	18:59:16:18	for	00:00:30:03	0
Sat	06/21/2008	at	05:55:39:10	for	00:00:30:03	0
Sat	06/21/2008	at	08:58:48:11	for	00:00:30:03	0
Sat	06/21/2008	at	11:26:58:09	for	00:00:30:03	0
Sat	06/21/2008	at	19:57:36:09	for	00:00:30:03	0
Sat	06/21/2008	at	21:50:54:12	for	00:00:30:03	0
Sun	06/22/2008	at	00:27:18:18	for	00:00:30:03	0
Sun	06/22/2008	at	04:56:40:00	for	00:00:30:03	0
Sun	06/22/2008	at	20:57:56:11	for	00:00:30:03	0
Mon	06/23/2008	at	19:26:10:17	for	00:00:30:03	0
Mon	06/23/2008	at	21:59:26:20	for	00:00:30:03	0
Tue	06/24/2008	at	23:26:49:23	for	00:00:30:03	0
Wed	06/25/2008	at	00:57:18:09	for	00:00:30:03	0
Wed	06/25/2008	at	04:52:15:08	for	00:00:30:03	0
Wed	06/25/2008	at	20:59:27:19	for	00:00:30:03	0
Thu	06/26/2008	at	05:29:26:26	for	00:00:30:03	0
Thu	06/26/2008	at	18:58:46:09	for	00:00:30:03	0
Thu	06/26/2008	at	22:56:38:12	for	00:00:30:03	0
Fri	06/27/2008	at	19:27:53:08	for	00:00:30:03	0
Fri	06/27/2008	at	21:27:16:05	for	00:00:30:03	0
Sat	06/28/2008	at	00:56:48:12	for	00:00:30:03	0
Sat	06/28/2008	at	05:56:14:27	for	00:00:30:03	0
Sat	06/28/2008	at	08:58:46:07	for	00:00:30:03	0
Sat	06/28/2008	at	11:56:46:11	for	00:00:30:03	0
Sat	06/28/2008	at	20:29:00:16	for	00:00:30:03	0
Sat	06/28/2008	at	21:49:22:07	for	00:00:30:03	0
Sat	06/28/2008	at	23:57:16:09	for	00:00:30:03	0
Sun	06/29/2008	at	05:26:46:14	for	00:00:30:03	0
Sun	06/29/2008	at	19:26:07:14	for	00:00:30:03	0
Sun	06/29/2008	at	20:56:48:01	for	00:00:30:03	0
Mon	06/30/2008	at	20:58:29:12	for	00:00:30:03	0
Tue	07/01/2008	at	22:59:29:00	for	00:00:30:03	0
Tue	07/01/2008	at	23:29:27:10	for	00:00:30:03	0

This item appeared 326 times between 04/01/2008 and 07/01/2008.

CountdowntoDTV

ATTACHMENT I

KLCS-TV

Report date: 09/23/2008

Log Performance Report (PGM)

Report time: 09:24:22

From: 04/01/2008 To: 07/01/2008

Page: 1

AirDate	AirTime	Title	Subtitle	PType	S C A	T A S	E P 2	Length
Type	Source	Top	STA Channel					
06/29/08	19:30:00		COUNTDOWN TO DTV #2009	SDBA	N	N	N	00:23:09 0
	0 0		KLCS-TV					
			DIGITAL TRANSITION					

Total time for selected programs: 0000:23:09
 Total occurrences for selected programs: 1

Statement Under Penalty of Perjury

My name is Dr. Janalyn W. Glymph, and I am General Manager of Station KLCS, Los Angeles, California which is licensed to and operated by the Los Angeles Unified School District. I have served in this capacity since January 2000. I have directed our administrative staff to provide me with information responsive to the following questions set forth in the Enforcement Bureau's letter of September 15, 2008 (File No. EB-08-SE-771) relating to potential violations by KLCS of the DTV Consumer Education Initiative.

1. For the period April 1, 2008 through and including April 30, 2008 state the number of days Station KLCS failed to air at least 60 seconds per day of DTV transition consumer education PSAs. State your response in whole numbers only. In addition, explain in detail, if applicable, the reason why Station KLCS failed to air the required amount of PSAs.

For the period April 1, 2008 through and including April 30, 2008, Station KLCS did not fail to air at least 60 seconds per day of DTV transition consumer education PSAs; specifically, Station KLCS broadcast more than double the thirty minute monthly requirement of DTV transition consumer education PSAs during this time period. Accordingly, Station KLCS was in complete compliance with the overall PSA requirements during the period of April 1-30, 2008.

2. For the period May 1, 2008 through and including June 30, 2008 state the number of days Station KLCS aired at least 120 seconds per day of DTV transition consumer education PSAs. State your response in whole numbers only. In addition explain in detail, if applicable, the reason why Station KLCS failed to air the required amount of PSA's.

For the period May 1, 2008 through and including June 30, 2008, Station KLCS aired at least 120 seconds per day of DTV transition consumer education PSAs on a total of 43 days; however, the Station did fail to air the minimum required amount of PSAs on 18 days during such period.

On or about July 2, 2008, the Administrative Analyst for Station KLCS began preparing FCC Form 388 – DTV Quarterly Activity Station Report for the second quarter (April – June 2008). Upon review of the station logs it became evident that there were shortfalls between May 1, 2008 and July 1, 2008 in meeting the two minute daily minimum broadcast requirement.

Upon further investigation it was found that the Multicast Traffic Coordinator responsible for placing the DTV Consumer Education spots either missed and/or misunderstood the required increase in airtime starting on May 1, 2008. The reason why Station KLCS failed to air the required amount of PSAs was human error.

Immediately upon finding the error, a meeting took place with the Director of Programming & Operations, who is responsible for overseeing that the logs are prepared in compliance with FCC regulations, the Multicast Traffic Coordinator who prepares the logs, and the Administrative Analyst responsible for reporting to the FCC. All FCC requirements were revisited and a system of safeguards was put into place to insure future compliance.

Under the new procedure the Director of Programming and Operations and the Administrative Analyst are provided broadcast logs prior to broadcast. The Analyst logs all DTV Consumer Education spots prior to air and confirms that minimum

requirements are scheduled. The day after broadcast, the same Analyst reviews that each of the spots actually aired.

Since the implementation of the new safeguards, there have been no failures regarding the minimum requirements of DTV Consumer Education. Unfortunately, however, the error was found on July 2, 2008 which means Station KLCS will also be in violation for one day of the third quarter of 2008 due to the single, July 1, 2008 shortfall.

As reported on page two of FCC 388 DTV Quarterly Activity Station Report (File No. BDERET-20080711AEE), the time devoted to DTV Consumer Education has far exceeded the required overall times; KLCS submits that, notwithstanding the above-referenced shortfall on specific days, its overall performance evidences the licensee's recognition and commitment to the implementation of the Commission's DTV consumer education objectives.

3. For the period April 1, 2008 through and including April 30, 2008, state whether Station KLCS aired a total of at least 7.5 minutes of DTV transition consumer education PSAs between the hours of 6:00 p.m. and 12:00 a.m. In addition, explain in detail, if applicable, the reason why Station KLCS failed to air the required amount of PSAs.

For the period April 1, 2008 through and including April 30, 2008, Station KLCS aired a total of at least 7.5 minutes of DTV transition consumer education PSAs between the hours of 6:00 p.m. and 12:00 a.m.; specifically, Station KLCS broadcast a total of 35 minutes of DTV transition consumer education PSAs between the hours of 6:00 p.m. and 12:00 a.m., representing nearly four times the

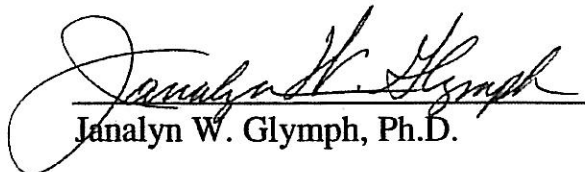
required amount. Accordingly, Station KLCS was in complete compliance of the time specific PSA requirements for the period of April 1-30, 2008.

4. For the period May 1, 2008 through and including June 30, 2008, state whether Station KLCS aired a total of at least 15 minutes per month of DTV transition consumer education PSAs between the hours of 6:00 p.m. and 12:00 a.m. In addition, explain in detail, if applicable, the reason why Station KLCS failed to air the required amount of PSAs.

For the period May 1, 2008 through and including June 30, 2008, Station KLCS aired a total of at least 15 minutes per month of DTV transition consumer education PSAs between the hours of 6:00 p.m. and 12:00 a.m.; specifically, Station KLCS broadcast a total of 107 minutes of DTV transition consumer education PSAs between the hours of 6:00 p.m. and 12:00 a.m., representing more than three times the required amount. Accordingly, Station KLCS was in complete compliance of the time specific PSA requirements for the period of May 1-June 30, 2008.

My statement is based, in part, on a separate Statement Under Penalty of Perjury of Thomas Taitt, Station KLCS' Administrative Analyst. Mr. Taitt was responsible for compiling information and submitting the FCC Form 388 DTV Quarterly Activity Station Report, and I have relied upon his experience, knowledge and investigation in assuring that such information is accurate.

Executed under penalty of perjury this 24th day of September, 2008.


Janalyn W. Glymph, Ph.D.