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April 28, 2011

RECEIVED - FCC

APR 28 2011

Federal Communications Commission  
Bureau / Office

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Joyce L. Bernstein, Esq.  
Video Division, Media Bureau  
Federal Communications Commission  
Washington, DC 20554

Re: WIWU-CD, Marion, IN  
Facility ID No. 29292  
Children's Television Report Inquiry

Dear Ms. Bernstein:

Submitted herewith in duplicate is the response of Indiana Wesleyan University to your above-referenced letter of March 24, 2011, concerning Class A Television station obligations and Children's Television Reports for Station WIWU-CD, Marion, Indiana.

An extension of time was granted until April 29, 2011, to file this response.

If there are any questions about this matter, please contact the undersigned.

Very truly yours,

  
Peter Tannenwald

cc: (w/att - by e-mail)  
Dr. Randall E. King (public inspection file)



OFFICE OF THE PRESIDENT

April 28, 2011

Joyce L. Bernstein, Esq.  
Video Division  
Media Bureau  
Federal Communications Commission  
Washington, DC 20554

RE: WIWU-CD, Marion, Indiana  
Facility ID No. 29292  
Children's Television Reports

Dear Ms. Bernstein:

In reply to your letter of March 24, 2011, attached is a Statement of Paul Crisp, Station Manager, who is the person with the best personal knowledge of the facts required to respond to your inquiry.

WIWU-CA has an active local presence in the community. We have no desire to relinquish Class A status.

The University regrets any lapse in properly submitting the required online reports and assures you that any lapse was inadvertent. We did broadcast children's programming, so any lapse involved only documentation and not programming service to the public.

Sincerely,

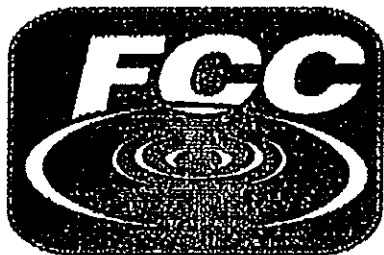
A handwritten signature in cursive script that reads "Henry L. Smith".

Henry L. Smith, Ph.D.  
President

## STATEMENT OF PAUL CRISP

PAUL CRISP hereby declares as follows:

1. I am the Station Manager of Station WIWU-CD, Marion, Indiana.
2. It is my responsibility to file Children's Television Reports (FCC Form 398) for that station. I am familiar with the FCC's online system for filing Form 398 and have filed reports regularly since 2003.
3. I do not know why reports were found missing for 2009 and 2010, because I remember working on the reports during those years. In one case, I received a reminder from the Indiana Broadcasters Association but was unable to file a report because I tried to file on too early a date. I also remember being somewhat confused over how to report after the station converted from analog to digital operation in June of 2009, because the form separates analog from digital programming. If I made errors that caused the reports not to be accepted by the online system, I cannot reconstruct at this time what they were.
4. We have internal records of our program schedule to support the fact that we did broadcast children's programming during all of 2009 and 2010. After receiving the FCC's letter of inquiry dated March 24, 2011, and satisfying myself that I would not be able to locate the reports online even trying different call sign combinations (WIWU, WIWU-CA, WIWU-CD), I filed new reports on March 29, 2011, for all four quarters of 2009 and 2010. The first quarter report for 2011 has also been filed. I went through our records carefully and on April 26, 2011, updated the reports to reflect pre-emptions I found during 2009-2010. Pre-emptions are extremely rare but occurred during these years because of Christmas specials that the station broadcast, the station being licensed to a Christian university.
5. We have a public inspection file at the main studio, but it is computer-based. Computers are available for members of the public to use without charge. Access to children's reports is afforded by computer by way of the station's website, which has a link to the FCC's online Children's Reports system, allowing a member of the public to retrieve any of the reports we have filed. Since we use computer-based access to these reports, I do not have hard paper copies of the reports. Access to the reports is at "FCC Info and Links" on this page: <http://wiwutv51.com/info/index.html>. An image of the display is shown below.



### **FCC Links:**

[Main Station FCC Page](#)

[Children's Programming Info](#) - Call Sign: WIWU

**Statement of Paul Crisp**

**Page 2**

6. WIWU-CA is an active local station based on the Indiana Wesleyan University campus. We operate our station as a public service. We do not sell or broadcast commercials. Our main studio is on the campus. The campus is at 4201 S. Washington St., Marion, Indiana. Individual buildings on campus do not have separate street addresses. The public file is in the TV studio building, known as the Elder Building, which has a large sign on the outside displaying our call letters.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 26, 2011.



Paul Crisp