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December 2, 2021

**VIA EMAIL**

Robert Baker, Assistant Chief, Policy Division, Media Bureau  
Gary Schonman, Special Counsel, Policy Division, Media Bureau  
Sima Nilsson, Attorney-Advisor, Policy Division, Media Bureau  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554  
[Robert.Baker@fcc.gov](mailto:Robert.Baker@fcc.gov)  
[Gary.Schonman@fcc.gov](mailto:Gary.Schonman@fcc.gov)  
[Sima.Nilsson@fcc.gov](mailto:Sima.Nilsson@fcc.gov)

**RE: *In the Matter of Online Political Files of Chadrad Communications, Inc.***  
**File No. POL-070621-3777224/ FRN 3777224**  
**Compliance Report**

Dear Mr. Baker, Mr. Schonman, and Ms. Nilsson:

Chadrad Communications, Inc, licensee of KPBY(FM), Hay Springs, Nebraska, (Facility ID No. 183367) and standard broadcast station KCSR, Chadron, Nebraska (Facility ID 10081) (the “Stations”), by its undersigned counsel, hereby files this Compliance Report as set forth in the terms of the Consent Decree (DA 21-836) (“Consent Decree”) adopted and released on July 15, 2021 (“Effective Date”) in the above-referenced proceeding. Capitalized terms used herein are intended to have the same meaning as they have been given in the Consent Decree. Chadrad Communications, Inc’s efforts to comply with the terms and conditions of the Consent Decree are set forth below.

1. **Compliance Officer.** On July 15, 2021, i.e., within thirty (30) calendar days after the Effective Date, Chadrad Communications, Inc. designated Michael Kesselring to serve as Compliance Officer, and to discharge the duties set forth in the Consent Decree.

2. **Compliance Manual.** On July 15, 2021, Chadrad Communications, Inc. adopted and distributed a Compliance Manual to the Covered Employees. The Compliance Manual explains the requirements of the Political Record-keeping Statute and Rule. The Compliance Manual also contains Operating Procedures that Covered Employees must follow to try to keep Chadrad Communications, Inc. in compliance with the Political Recordkeeping Statute and Rule – including internal procedures designed to ensure that all required documentation is timely uploaded to the relevant Station’s online political files and otherwise maintains full, complete,

and up to date information in those files. Chadrad Communication, Inc.'s Operating Procedures also include a compliance checklist that describes the steps that a Covered Employee must follow to ensure compliance with the Political Record-keeping Statute and Rule. Chadrad Communications, Inc. will periodically review its Compliance Manual as necessary to ensure that the information in the Manual remains current, complete, accurate, and effective.

2. **Compliance Training Program.** On July 19 and July 22, 2021, all Covered Employees were trained pursuant to the Compliance Training Program. Furthermore, Chadrad Communications, Inc. has adopted and implemented the following policies with respect to the Compliance Training Program: (i) any person who becomes a Covered Employee at any time after the initial Compliance Training Program shall be trained within thirty (30) calendar days after the date such person becomes a Covered Employee; (ii) Chadrad Communications, Inc. shall repeat compliance training for all Covered Employees on an annual basis; and (iii) Chadrad Communications, Inc. shall periodically review and revise Compliance Training Program as necessary to ensure that it remains current, complete, and effective.

3. **Reporting Noncompliance.** Within ten (10) calendar days after discovery, Chadrad Communications, Inc. will report any noncompliance with: (i) the Political Record-keeping Statute and Rule; and (ii) the terms and conditions of this Consent Decree. Chadrad Communications, Inc. has implemented a policy that such reports include a detailed explanation of: (i) each instance of noncompliance; (ii) the steps that Chadrad Communications, Inc. has taken or will take to address such noncompliance – including a schedule on which such actions will be taken; and (iii) the steps that Chadrad Communications, Inc. has taken or will take to prevent the recurrence of any such noncompliance – including the schedule on which such preventative action will be taken. Chadrad Communications, Inc. has implemented a policy that any reports of noncompliance shall be sent to the Political Programming staff within ten (10) calendar days of discovery of such noncompliance: Robert Baker, Assistant Chief, Policy Division, Media Bureau, Federal Communications Commission, at Robert.Baker@fcc.gov; Gary Schonman, Special Counsel, Policy Division, Media Bureau, Federal Communications Commission, at Gary.Schonman@fcc.gov; and Sima Nilsson, Attorney-Advisor, Policy Division Media Bureau, Federal Communications Commission, at Sima.Nilsson@fcc.gov.

To date, Chadrad Communications has not needed to execute its obligations pursuant to Paragraph 16 of the Consent Decree.

4. **Summary of Compliance Efforts.** Attached hereto is Chadrad Communications, Inc.'s Summary of Compliance Efforts, in the form of an Excel spreadsheet, which documents the Stations' efforts during the relevant reporting period (August 2, 2021 through November 2, 2021) to comply with the Political Record-keeping Statute and Rule and the Consent Decree.

The foregoing statements also serve as the explanation and basis for the Compliance Officer and President's Certifications enclosed with this Compliance Report. Should you have any questions concerning this Compliance Report, please contact the undersigned counsel for Chadrad Communications, Inc.

Respectfully submitted,



Kathleen Victory  
*Counsel for Chadrad Communications, Inc.*

Enclosures