



May 2, 2024

Elizabeth Goldin, Esq., Assistant Chief
Investigations & Hearings Division, Enforcement Bureau
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: EEO Audit of WACX(TV), Leesburg, Florida (FIN: 60018)

To Whom It May Concern:

SuperChannel Worship Ministries, Inc. ("SuperChannel") hereby responds to the letter from the Commission's EEO Staff, dated March 22, 2024 ("Letter"), informing SuperChannel that the employment unit ("Unit") associated with WACX(TV), Leesburg, Florida ("Station") has been randomly selected for an audit of its EEO program. Below in bold type are the requests from the EEO Staff, followed by PVBC's responses.

2b(i): Provide copies of the Unit's two most recent EEO Public File Reports.

Response: Attached as Exhibit 2(b)(i)-1 is the Report covering the October 1, 2021 – September 30, 2022 period and attached as Exhibit 2(b)(i)-2 is the Report covering the October 1, 2022 – September 30, 2023 period. Note that the Reports covering both periods recently were revised to account for additional recruitment initiatives that were undertaken during each such period. The revised Report covering the October 1, 2022 – September 30, 2023 period was uploaded to the Station's online public inspection file on April __, 2024.

SuperChannel is a church organization, and is recognized as tax-exempt by the Internal Revenue Service. For many years, the name of the Station's licensee was Associated Christian Television System, Inc. On August 22, 2022, the directors of the company elected to change the name of the licensee to SuperChannel, while remaining a church organized under Section 501(c)(3) of the Internal Revenue Code, and also executed Amended and Restated Bylaws ("Bylaws"). Pursuant to the Bylaws, the express purposes of SuperChannel include the operation of a Christian ministry, founded upon and tested by Bible principles to the end, that through the Holy Spirit all people may be better prepared for living the abundant life of the Lord Jesus Christ. SuperChannel carries out its purposes by, among other things, conducting regular worship/church services, providing prayer and financial assistance to needy individuals, engaging in telecasting and broadcasting activities, including on the Station, and collaborating with other churches and Christian ministries with shared doctrinal beliefs.



WACX-TV | 123 E Central Parkway | Altamonte Springs FL 32701 | 407-263-4040

www.superchannel.com

The Bylaws also expressly provide that all Directors and Executive Officers be of the Christian faith. As set forth herein and in the attached EEO Public File Reports, the Station did not hire any full-time employees between October 1, 2021 to September 30, 2023. If the Station had hired any full-time employees since August 22, 2022 (the date that the Bylaws were enacted), such employees would have been subject to the requirement set forth by SuperChannel that all employees be members of the Christian faith. Such restriction is consistent with Section 73.2080 of the Commission's rules, which expressly provides that broadcasters may establish religious belief or affiliation as a job qualification for all station employees.

2(b)(ii): For each station in the Unit that maintains a website, the website address.

Response: The Station's website is www.superchannel.com. The Unit's most recent public file report is included on that website.

2b(iii): For each of the Unit's full-time positions filled during the period covered by the EEO Public File Reports noted above, provide the date of hire, as well as dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position.

Response: As indicated in the attached EEO Public File Reports, during the periods covered by the Unit's two most recent EEO Public File Reports, SuperChannel did not hire any full-time employees.

2b(iv): Provide the total number of interviewees for each vacancy and the referral source for each interviewee for all the Unit's full-time vacancies filled during the period covered by the above-noted EEO Public File Reports.

Response: Not applicable. As indicated above, the Unit did not hire anyone during the periods covered by the Unit's two most recent EEO Public File Reports.

2(b)(v): Provide dated documentation demonstrating performance of the Unit's recruitment initiatives during the period covered by the above-noted EEO Public File Reports. Specify the Unit personnel involved in each such recruitment initiative. In addition, provide the Unit's total number of full-time employees and state whether the population of the market in which any of the Unit's stations operates is 250,000 or more. Based upon these two factors, state whether the Unit is required to perform two or four points worth of initiative activities within a two-year period.

Response: Attached as Exhibit 2(b)(v)-1 is available documentation associated with the Unit's participation at the Apopka Mayor's Prayer Breakfast on May 4, 2023. The Unit

Personnel involved are listed as part of the entry set forth on the Unit's 2022-2023 EEO Public File Report.

Attached as Exhibit 2(b)(v)-2 is available documentation associated with the Unit's participation at the National Religious Broadcaster Convention in late May 2023. The Unit Personnel involved are listed as part of the entry set forth on the Unit's 2022-2023 EEO Public File Report.

Attached as Exhibit 2(b)(v)-3 is available documentation associated with the Unit's participation at the International Gathering of Kings & Priests at Majestic Life Church in Orlando, Florida on June 9, 2023. The Unit Personnel involved are listed as part of the entry set forth on the Unit's 2022-2023 EEO Public File Report.

Attached as Exhibit 2(b)(v)-4 is available documentation associated with the Unit's participation at the Real Men Wear P.I.N.K. Conference on May 9, 2023. The Unit Personnel involved are listed as part of the entry set forth on the Unit's 2022-2023 EEO Public File Report.

Attached as Exhibit 2(b)(v)-5 is available documentation associated with the Unit's participation in an internship program, which began in August 2022. The Unit Personnel involved are listed as part of the entries set forth on both of the attached EEO Public File Reports.

The Unit currently has eight full-time employees and the population of the market in which the Station operates is more than 250,000. Accordingly, if SuperChannel was not a religious broadcaster, it would have been required to perform four points worth of initiative activities within the two-year period between October 1, 2021 to September 30, 2023.

However, as indicated above, SuperChannel is a religious broadcaster and, since August 22, 2022, has officially established Christian affiliation as a job qualification for all Station employees. As such, SuperChannel has not had to undertake any recruitment initiatives since August 22, 2022, consistent with *Review of the Commission's Broadcast and Cable Equal Employment Opportunity Rules and Policies*, 17 FCC Rcd 24018, 24059 (2002). Prior to August 22, 2022, the staff hired by the Station were not subject to the religious qualification.

Section 73.2080 requires only that initiatives be undertaken during a two-year period. As such, arguably SuperChannel was not required to undertake any initiatives at all during the two-year period between October 1, 2021 to September 30, 2023. Nevertheless, as provided in the EEO Public File Reports, SuperChannel completed at least two points' worth of initiatives during that two-year period.

2(b)(vi): Disclose any pending or resolved complaints involving the Unit filed during the Unit's current license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex.

Response: There are no pending or resolved complaints involving the Unit filed during the current license term of the Station before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex.

2(b)(vii): During the Unit's current license term, describe the responsibilities of each level of Unit management responsible for implementing Unit EEO policies how the Unit has informed employees and job applicants of its EEO policies and program.

Response: The Unit's managerial staff regularly meets to discuss various topics. These meetings usually cover employment and other EEO-related matters. Ultimately, the Unit's President/General Manager, along with the Unit's Creative Director, are responsible for overseeing EEO compliance. In addition to ensuring that notices regarding full time job openings are widely distributed to diverse groups throughout the area, the Human Resources Director is responsible for providing information regarding the Unit's EEO policies to employees and persons applying for new positions with the Unit. In the event that SuperChannel seeks to fill a new position, it will make all job applicants aware of the requirement that such person be a member of the Christian faith.

2(b)(viii): During the Unit's current license term, describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis.

Response: The Unit's managerial staff has routine ongoing conversations regarding FCC EEO policies. Despite being a religious broadcaster, and therefore not required to undertake any recruitment initiatives, the Unit intends to continue its outreach efforts throughout the communities served by the Station.

2(b)(ix): During the Unit's current license term, describe the Unit's efforts to analyze periodically its measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect, and if the Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.

Response: Periodically, the Unit's managerial staff members review all compensation packages for SuperChannel's employees to ensure that such packages are fair and comply with the Unit's compensation system. Each year at budget time, the Unit's President/General Manager reviews the Unit's benefits, seniority practices, promotions and selection techniques to ensure that they provide equal opportunity and do not have a discriminatory effect. When positions are open, they are widely announced, including on the Station, which ensures that every employee has the opportunity to apply for a promotion or transfer to another department. The Unit's manager charged with reviewing the Unit's EEO program also periodically reviews the Unit's interview process and job application template to ensure that its hiring and interview guidelines are adequate.

The Unit has no agreements with any union.


2(b)(x): If your entity is a religious broadcaster and any of the Unit's full-time employees are subject to a religious qualification as described in section 73.2080 of the rules, the Unit should indicate that status in its response and provide data as applicable to its EEO program.

Response: SuperChannel is a religious broadcaster. However, it did not undertake any hires during the period covered by the two most recent EEO Public File Reports. As a result, no additional data are being provided.

(3) – (4) Time Brokerage.

Response: Not applicable.

I hereby certify that the foregoing response is accurate and complete to the best of my knowledge, information and belief. Should you have any questions regarding the foregoing response, please contact our attorney, Mark B. Denbo, at 202-350-9656 or mdenbo@fccworld.com.

Sincerely,

Victor Bowers
Vice President

Attachments

EXHIBIT 2(b)(i) - 1

2021-22 EEO Public File Report

EEO PUBLIC FILE REPORT

Dates: October 1, 2021—September 30, 2022*

Station Employment Unit

<i>Call Sign</i>	<i>Facility ID</i>	<i>Community of License</i>
WACX	60018	Leesburg, Florida

Recruitment Sources

<i>Source</i>	<i>Contact</i>	<i>Address</i>	<i>Phone/email</i>
Central Florida Employment Council	Paulette Weir	450 Seminola Blvd Casselberry, FL 32707	407-834-4223 www.cfec.org cfec@cfec.org
Central Fla. Assoc. of Black Journalists	manual posting	PO Box 7445 Orlando FL 32802	http://cfabj.wordpress.com Career Services
Central Florida Urban League	S. Richardson	2804 Belco Drive Orlando FL 32808	407-841-7654 info@cful.org
Daytona State College	Becky Nero-Wall	1200 International Speedway Blvd. Daytona Beach, Florida 32114	386-506-3610 www.dbcc.cc.fl.us nerobe@daytonastate.edu Fax : 1-386-506-3150
Florida Assoc. of Broadcasters	Lindsey Varn	201 S Monroe St, #201 Tallahassee FL 32301	850-681-6444 info@fab.org Fax: 850-222-3957
Full Sail Placement	Karen Trudeau	3300 University Blvd, #160 Orlando FL 32792	866-807-3140 www.fullsail.com ctrudeau@fullsail.com Fax: 407-671-2240
Indeed.com	Website	n/a	n/a
Latino Leadership	Barbara Betancourt	8617 E Colonial Drive Orlando FL 32803	407-895-0801 www.latinoleadership.org Fax: 407-895-0803
Rollins College	Kyle Nelson	1000 Holt Avenue Winter Park FL 32789	407-646-2196
Seminole State College	David Telleria	100 Weldon Blvd Sanford FL 32773	407-708-2033 ext. 2649
Stetson University	Annette Accorto	421 N. Woodland Blvd. Deland FL 32723	386-822-7315 www.stetson.edu career@stetson.edu
University of Central Florida Career Resource Center	Genesis Rawls	PO Box 160165 Orlando FL 32816	407-823-3368
Valencia State College Career Placement	Merling Anglade	8600 Valencia College Lane Orlando FL 32825	407-582-2726 www.valenciacc.edu/careerdevelopment
Internal posting	Victor Bowers	123 E Central Parkway Altamonte Springs FL 32701	407-263-4040 www.superchannel.com
WACX-TV website— www.superchannel.com	Victor Bowers	123 E Central Parkway Altamonte Springs FL 32701	407-263-4040 www.superchannel.com

Full-Time Positions Available

No full-time vacancies during reporting period.

WACX-TV
 EEO Public File Report
 2022 Recruitment Initiatives

	Date	Type of Recruitment Initiative	Brief Description of Activity	# of Participants	Task/Department
1	August 6, 2022	Establishment of an intern program designed to assist student-members of the community.	Station offers year-round internship program for college students who are taking the course for college credit	1	Production— Camera Operator

*This Report was amended on April 30, 2024. This Report is intended to replace, in its entirety, the Report that was uploaded to the WACX OPIF on September 30, 2022.

EXHIBIT 2(b)(i) - 2
2022-23 EEO Public File Report

EEO PUBLIC FILE REPORT

Dates: October 1, 2022—September 30, 2023*

Station Employment Unit

<i>Call Sign</i> WACX	<i>Facility ID</i> 60018	<i>Community of License</i> Leesburg, Florida
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Recruitment Sources

<i>Source</i>	<i>Contact</i>	<i>Address</i>	<i>Phone/email</i>
Central Florida Employment Council	Paulette Weir	450 Seminola Blvd Casselberry, FL 32707	407-834-4223 www.cfec.org cfec@cfec.org
Central Fla. Assoc. of Black Journalists	manual posting	PO Box 7445 Orlando FL 32802	http://cfabj.wordpress.com Career Services
Central Florida Urban League	S. Richardson	2804 Belco Drive Orlando FL 32808	407-841-7654 info@cful.org
Daytona State College	Becky Nero-Wall	1200 International Speedway Blvd. Daytona Beach, Florida 32114	386-506-3610 www.dbcc.cc.fl.us nerobe@daytonastate.edu Fax : 1-386-506-3150
Florida Assoc. of Broadcasters	Lindsey Varn	201 S Monroe St, #201 Tallahassee FL 32301	850-681-6444 info@fab.org Fax: 850-222-3957
Full Sail Placement	Karen Trudeau	3300 University Blvd, #160 Orlando FL 32792	866-807-3140 www.fullsail.com ktrudeau@fullsail.com Fax: 407-671-2240
Indeed.com	Website	n/a	n/a
Latino Leadership	Barbara Betancourt	8617 E Colonial Drive Orlando FL 32803	407-895-0801 www.latinoleadership.org Fax: 407-895-0803
Rollins College	Kyle Nelson	1000 Holt Avenue Winter Park FL 32789	407-646-2196
Seminole State College	David Telleria	100 Weldon Blvd Sanford FL 32773	407-708-2033 ext. 2649
Stetson University	Annette Accorto	421 N. Woodland Blvd. Deland FL 32723	386-822-7315 www.stetson.edu career@stetson.edu
University of Central Florida Career Resource Center	Genesis Rawls	PO Box 160165 Orlando FL 32816	407-823-3368
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WACX-TV website— www.superchannel.com	Victor Bowers	123 E Central Parkway Altamonte Springs FL 32701	407-263-4040 www.superchannel.com

Full-Time Positions Available

No full-time vacancies during the reporting period.

WACX-TV

EEO Public File Report

2022 Recruitment Initiatives

#	Date	Type of Recruitment Initiative	Brief Description Of Activity	No. of Stations Participants	Participant(s) Title
1	May 4, 2023	Participation in events sponsored by organizations representing the community	Claud Bowers, President/GM of SuperChannel Worship Ministries, Inc., spoke at the Apopka Mayor's Prayer Breakfast as their honored guest and recipient of Community Leadership Award. Mr. Bowers spoke about his inspiration to pursue television and media broadcasting from an early age. He encouraged students and young breakfast attendees to seek new media technologies to make their voices heard in the marketplace. He spoke about his path to TV broadcasting and media influence, how he overcame obstacles in his early days. He encouraged and motivated other business professionals to seek honesty and fidelity in their business pursuits and to always be open to new ways to give back to their community.	6	Claud Bowers <i>Pres/GM</i> Victor Bowers <i>Creative Dir.</i> Terrie Kelly <i>Sales Mgr</i> Linda Markowitz <i>Administration</i> Angela Doggett <i>Executive Staff</i> Orente Cobb <i>Production Mgr.</i>

#	Date	Type of Recruitment Initiative	Brief Description Of Activity	No. of Stations Participants	Participant(s) Title
2	May 22-25, 2023	Participation in events sponsored by organizations representing the industry	SuperChannel Worship Ministries, Inc./WACX-TV participated in and exhibited at the National Religious Broadcasters (NRB) convention held in Orlando. SCO staff interacted with conventioners discussing media outreach, community programming initiatives and involvement in the market through religious programming. Staff also attended various classes and seminars on topics of broadcasting tribalism, global cultural impact and ethnic Christianity, digital inclusion in the media, etc.	6	Claud Bowers <i>Pres/GM</i> Victor Bowers <i>Creative Dir.</i> Terrie Kelly <i>Sales Mgr</i> Angela Mackenzie <i>Board member</i> Angela Doggett <i>Executive Staff</i> Orente Cobb <i>Production Mgr.</i>

#	Date	Type of Recruitment Initiative	Brief Description Of Activity	No. of Stations Participants	Participant(s) Title
3	June 9, 2023	Participation in events sponsored by organizations representing the church and community	Claud Bowers, President/GM of SuperChannel Worship Ministries, Inc., spoke at the International Gathering of Kings & Priests at Majestic Life Church in Orlando, Florida. Mr. Bowers spoke about his background and experience in the media industry since 1978. He spoke about the importance of sharing the Message and living your values and helping others to prosper in their lives and vocations. He empowered the men's conference to take their God-given role as males but to exhibit Christ-likeness through serving and fostering opportunities for others.	2	Claud Bowers <i>Pres/GM</i> Victor Bowers <i>Creative Dir.</i>

#	Date	Type of Recruitment Initiative	Brief Description Of Activity	No. of Stations Participants	Participant(s) Title
4	May 19, 2023	Participation in events sponsored by organizations representing the public education and the community	Claud Bowers, President/GM of SuperChannel Worship Ministries, Inc., was keynote speaker at Real Men Wear P.I.N.K. (Powerful/Inspired/Nurturing/Knowledgeable) Conference presented by the Rose of Sharon Life-Changing Ministries. ROSLCM is a faith-based rehabilitative educational organization that seeks to empower students to make positive choices in regards to their education and behavior as well as understand the consequences of their actions. Mr. Bowers spoke about his career in the broadcasting industry. He offered practical advice and encouragement to those interested in such pursuits.	2	Claud Bowers <i>Pres/GM</i> Victor Bowers <i>Creative Dir.</i>

	Date	Type of Recruitment Initiative	Brief Description of Activity	# of Participants	Task/Department
1	October 1, 2022	Establishment of an intern program designed to assist student-members of the community.	Station offers year-round internship program for college students who are taking the course for college credit	1	Production—Camera Operator

*This Report was amended on April 30, 2024. This Report is intended to replace, in its entirety, the Report that was uploaded to the WACX OPIF on September 30, 2023.

EXHIBIT 2(b)(v) - 1

Apopka Mayor's Prayer Breakfast - May 4, 2023

Musician, Matti Veldhuis, drops album See page 7A.



Mustangs looking for four offensive linemen this spring. See page 1B.



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Volume 101 Number 19

Founder of Christian TV station speaks at prayer event

By Teresa Sargeant
Apopka Chief Staff

Speaking at his first event following the recent death of his wife, and a successful back surgery, Claud Bowers, co-founder and president of the SuperChannel Worship Ministry, Inc., spoke about the power of prayer especially on National Day of Prayer.

Bowers addressed a crowd of hundreds at the Apopka Mayor's Prayer Breakfast on Thursday, May 4, at the Apopka Community Center/VFW Building on South Central Avenue.

Prayer breakfasts like the one in Apopka are unlike any other prayer event, Bowers said.

"This is the 'it.' There's nothing like this, you un-

derstand? Try to get this crowd together on Christmas morning. Try to get this crowd together on the Fourth of July, and this is happening across the country," he said.

The Apopka Christian Ministerial Alliance (ACMA), in partnership with Mayor Bryan Nelson, organized the prayer breakfast. There, pastors from various churches prayed for the nation, military and veterans; the city of Apopka, its mayor and City Council; communities and families; first responders; Orange County mayor, sheriff's office, and county officials; and the future, youth and education.

Bowers opened his keynote by discussing his late wife of 58 years Freeda Bowers, who attended a

Tuesday morning prayer meeting when she experienced a problem with her digestive system. Up to that time, she had led this weekly meeting for 21 years, only missing it two times, Claud Bowers said.

Freeda Bowers asked her assistant to take her home but from there went to the hospital and underwent surgery. Four days later, she died on January 7. She and Claud Bowers had two children and one grandchild.

In 1978 in Leesburg, Mr. and Mrs. Bowers founded the SuperChannel Worship Ministry, Inc., a full-powered broadcasting Christian television station that is now headquartered in the North Orlando area.

See PRAYER Page 3A



Claud Bowers, co-founder and president of the SuperChannel Worship Ministry, Inc. addressed a crowd of hundreds at the Apopka Mayor's Prayer Breakfast on Thursday, May 4, at the Apopka Community Center/VFW Building on South Central Avenue.



EXHIBIT 2(b)(v) - 2

National Religious Broadcaster Convention - late May 2023

National Religious Broadcasters 2023—Orlando, FL



9:00 AM – 12:00 PM

Latino Leader Summit

(Additional registration required)

MAGNOLIA 13/14

ComunicadoresUSA presents an event in Spanish for the Latino community. This SUMMIT is becoming the most relevant event in Hispanic media.

1:15 PM – 2:00 PM

NRB Talks CANARY

Hiring in Today's World: How to Navigate the Pitfalls to Find Values Aligned Talent

Hear up to date analyses and advice on hiring in today's culturally divided world, presented by the CEO of America's largest pro-freedom job board and talent connector.

Speaker: Andrew Crapuchettes, Founder & CEO, RedBalloon

EXHIBIT 2(b)(v) - 3

**International Gathering of Kings & Priests at Majestic Life
Church in Orlando, Florida - June 9, 2023**



May 5, 2020

Mr. Claud Bowers
Super Channel Orlando
P.O. Box 608040
Orlando, FL 32860
Via email: cwb@superchannel.com

Dear Mr. Bowers:

Thank you for speaking with me to discuss the upcoming International Gathering of Kings & Priests set for June 9th-10th at Majestic Life Church in Orlando, Florida.

Your calling, background, and experience as a marketplace and ministry leader make you the epitome of why our organization exists. You are truly an example of everything we have taught our men worldwide for the past 20 years.

As such, we would like to honor you on June 9th with the “Lifetime King Award” for demonstrating outstanding kingdom values throughout your lifetime and helping your fellow man to prosper. We appreciate all that you have done for your city, community and church throughout the years.

You may view the entire schedule at www.KingsInc.com. Additionally, here’s a bit about us:

Kings & Priests Unlimited

A 20-year, 501(c)3 non-profit organization focuses on empowering men through wealth-building tools, courses, business academics, and networking events. The outcomes of our members have been better fathers, husbands, business start-ups, and providers. Previous speakers have been T.D. Jakes, John Maxwell, and Bubby Cathy of Chic-fil-A, to name a few.

Please encourage your leadership team and church to attend this momentous occasion. They may register at www.KingsInc.com.

We look forward to hearing your wisdom and empower our men build wealth, protect their families, and provide much-needed financial education.

Sincerely,

Robert J. Watkins, ThD.
Chairman

Kings & Priests, Inc. | 13506 Summerport Village, Suite 720, Windermere, Florida 34786
www.KingsInc.com | 1.888.526.1118

Per Dr. Watkins -6/6/23

Fridays event – Lifetime King Award
Majestic Life
821 S Kirkman Road
Orlando Florida 32811
Contact info: - Dr. Watkins - 770-771-3100

Itinerary

6:30p-7pm- Networking

Mr. Bowers call time - 6:45 pm – (escort) Nikia @ the door

Begins promptly @ 7pm

(3) speaker Mark Chironna - Simon Baily and Dr. Watkins

Honor service - Mr. Bowers

Life time King Award Outstanding Example - God Kingdom.

Mr. Bowers will speak - 4-5 minutes to address audience consist of mostly business men -re: investors – Bankers – includes about 50 Pastors.



EXHIBIT 2(b)(v) - 4

Real Men Wear P.I.N.K. Conference - May 9, 2023



EXHIBIT 2(b)(v) - 5
Internship program – Beginning August
2022

