

SM-KSGF-AM, LLC, SM-KSGF-FM, LLC, SM-KTTS, LLC

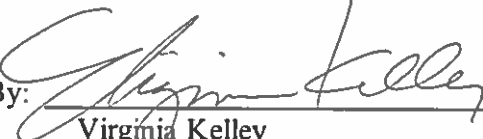
COMPLIANCE OFFICER CERTIFICATION

I, **Virginia Kelley**, have been appointed the Compliance Officer of SM-KSGF-AM, LLC, SM-KSGF-FM, LLC, and SM-KTTS, LLC (collectively, the "Licensee") with respect to Licensee's compliance with: (1) the Political File Record-keeping Statute and Rule (47 U.S.C. § 315(e)(3), and 47 C.F.R. § 73.1943(c)); and (2) the following Consent Decrees, by and between Licensee and the Media Bureau of the Federal Communications Commission, adopted and released February 23, 2021 and February 25, 2021 (DA 21-234/File No. POL-020121-27761907; DA 21-214/File No. POL-020121-27761857; and DA 21-213/File No. POL-020121-27761881) (collectively, the "Consent Decree"). Accordingly, I have the requisite authority to execute this certification as an agent of and on behalf of Licensee.

I have personal knowledge of the statements set forth in Licensee's Compliance Report, agree that those statements are true and correct, and adopt those statements as my own and as the basis for this certification.

I have personal knowledge that Licensee: (i) has established and implemented the Compliance Plan; (ii) has utilized the Operating Procedures since the implementation of the Compliance Plan; and (iii) is not aware of any instances of noncompliance with the terms and conditions of this Consent Decree.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on 12/8/2021.
(date)

By: 
Virginia Kelley
Compliance Officer
SM-KSGF-AM, LLC
SM-KSGF-FM, LLC
SM-KTTS, LLC

SM-KSGF-AM, LLC, SM-KSGF-FM, LLC, SM-KTTS, LLC

SENIOR OFFICER CERTIFICATION

I, **Darryl Grondines**, am the Senior Vice President - Finance of SM-KSGF-AM, LLC, SM-KSGF-FM, LLC, and SM-KTTS, LLC (collectively, the "Licensee"). I make this certification with respect to Licensee's Compliance Report, which is being filed pursuant to the following Consent Decrees, by and between Licensee and the Media Bureau of the Federal Communications Commission, adopted and released February 23, 2021 and February 25, 2021 (DA 21-234/File No. POL-020121-27761907; DA 21-214/File No. POL-020121-27761857; and DA 21-213/File No. POL-020121-27761881).

I hereby certify that: (i) I have reviewed the Compliance Report; and (ii) based upon my knowledge, the Compliance Report: (a) does not contain any untrue statement of a material fact; (b) does not omit to state a material fact necessary to make the statements made therein; and (c) is not misleading with respect to the period covered by the Compliance Report.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on 12/8/21.
(date)

By: 

Darryl Grondines
Senior Vice President - Finance
SM-KSGF-AM, LLC
SM-KSGF-FM, LLC
SM-KTTS, LLC

Compliance Report of SM-KSGF-AM, LLC, SM-KSGF-FM, LLC, SM-KTTS, LLC

SM-KSGF-AM, LLC, SM-KSGF-FM, LLC, and SM-KTTS, LLC (collectively, the “Licensee”), licensee of KSGF-FM, Ash Grove, MO (Facility ID No. 2924), KSGF-AM, Springfield, MO (Facility ID No. 62024), and KTTS-FM, Springfield, MO (Facility ID No. 62023) (collectively, the “Stations”), hereby submits this Compliance Report as set forth in the terms of the Consent Decree adopted and released February 23, 2021 and February 25, 2021 (DA 21-234/File No. POL-020121-27761907; DA 21-214/File No. POL-020121-27761857; and DA 21-213/File No. POL-020121-27761881) (collectively, the “Consent Decree”). Capitalized terms used herein are intended to have the same meaning as they have been given in the Consent Decree.

Attached hereto is Licensee’s Compliance Report, in the form of an Excel spreadsheet, which documents the Stations’ efforts during the relevant reporting period to comply with the Political Record-keeping Statute and Rule and the Consent Decree.

Additionally, Licensee has:

- 1) Designated a Compliance Officer to discharge the duties set forth in the Consent Decree;
- 2) Developed and distributed a Compliance Manual to all Covered Employees. The Compliance Manual thoroughly explains the requirements embodied in the Political Record-keeping Statute and Rule. Furthermore, the Compliance Manual contains Operating Procedures that Covered Employees must follow to help ensure Licensee’s compliance with the Political Record-keeping Statute and Rule. Licensee’s Operating Procedures include internal procedures and policies specifically designed to ensure that the Stations upload all required information to the Stations’ online political files in a timely manner and otherwise maintains full, complete, and up to date information therein. Licensee’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. Licensee has adopted a policy that it shall periodically review the Compliance Manual as necessary to ensure that the information set forth therein remains current, complete, accurate, and effective; and
- 3) Established and conducted a Compliance Training Program to provide its Covered Employees with periodic training on compliance with the Political Record-keeping Statute and Rule. As part of the Compliance Training Program, Licensee has ensured that all Covered Employees shall be: (i) advised of Licensee’s obligation to report any noncompliance with the Political Record-keeping Statute and Rule; and (ii) instructed on how to disclose noncompliance to the Compliance Officer. Furthermore, Licensee 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) Licensee shall repeat compliance training for all Covered Employees on an annual

basis; and (iii) Licensee shall periodically review and revise the Compliance Training Program as necessary to ensure that it remains current, complete, and effective.

To date, Licensee has not needed to execute its obligations pursuant to Paragraph 16 of the Consent Decree, requiring Licensee to report any noncompliance with: (i) the Political Record-keeping Statute and Rule; and (ii) the terms and conditions of this Consent Decree.

The foregoing statements serve as the explanation and basis for the Compliance Officer and the Senior Officer's Certifications enclosed with this Compliance Report.