

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
<b>WILLIS BROADCASTING CORPORATION</b>	)	File No. EB-02-IH-0873
	)	
Licensee of Stations KDLA, DeRidder, LA,	)	Facility ID #s 9028
KVLA, Vidalia, LA,	)	32180
WBTE, Windsor, NC,	)	172
WGRM, Greenwood, MS,	)	68577
WGRM-FM, Greenwood, MS,	)	11889
WHFD(FM), Lawrenceville, VA,	)	72503
WJNS-FM, Yazoo City, MS,	)	72816
WPCE, Portsmouth, VA,	)	72813
WSDT, Soddy-Daisy, TN,	)	31863
WTJH, East Point, GA,	)	72814
WURB(FM), Windsor, NC	)	173
	)	
<b>ALL-CHANNEL TV SERVICES, INC.</b>	)	
	)	
Licensee of Station WBIL, Tuskegee, AL	)	Facility ID # 1018
	)	
<b>ARKANSAS RADIO CORP.</b>	)	
	)	
Licensee of Station KLRG, North Little Rock, AR	)	Facility ID # 2778
	)	
<b>BIRMINGHAM CHRISTIAN RADIO, INC.</b>	)	
	)	
Licensee of Stations WAYE, Birmingham, AL,	)	Facility ID #s 5354
WLPH, Talladega, AL,	)	726
WNUZ, Talladega, AL,	)	54472
WRAG, Carrollton, AL	)	70262
	)	
<b>CHARLOTTE CHRISTIAN RADIO, INC.</b>	)	
	)	
Licensee of Station WGSP, Charlotte, NC	)	Facility ID # 10631
	)	
<b>CHRISTIAN BROADCASTING CORPORATION</b>	)	
	)	
Licensee of Station WBOK, New Orleans, LA	)	Facility ID # 10917
	)	
<b>DURHAM CHRISTIAN RADIO, INC.</b>	)	
	)	
Licensee of Stations WCRY, Fuquay-Varina, NC,	)	Facility ID #s 52645
WSRC, Durham, NC	)	17761
	)	
	)	
	)	

<b>EDENTON CHRISTIAN RADIO, INC.</b>	)	
Licensee of Station WBXB(FM), Edenton, NC	)	Facility ID # 18649
<b>KINSTON CHRISTIAN RADIO, INC.</b>	)	
Licensee of Stations WELS, Kinston, NC,	)	Facility ID #s 20408
WELS-FM, Kinston, NC	)	20409
<b>METRO COMMUNICATIONS, INC.</b>	)	
Licensee of Station WWCA, Gary, IN	)	Facility ID # 41332
<b>VIRGINIA URBAN RADIO, INC.</b>	)	
Licensee of Station WGPL, Portsmouth, VA	)	Facility ID # 69560
<b>WILLIS &amp; SONS, INC.</b>	)	
Licensee of Station WSVE, Jacksonville, FL	)	Facility ID # 10519
<b>WINSTON-SALEM BROADCASTING CORPORATION</b>	)	
Licensee of Station WCPK, Portsmouth, VA	)	Facility ID # 64003

**ORDER****Adopted: June 14, 2004****Released: June 16, 2004**

By the Chief, Enforcement Bureau:

1. By this *Order*, we adopt the attached Consent Decree entered into between the Enforcement Bureau and the above-captioned licensees, which is incorporated by reference herein.

2. We have reviewed the Consent Decree and evaluated the circumstances underlying the Bureau's investigation. We believe that the public interest would be served by adopting the Consent Decree and terminating the investigatory proceeding, except as provided in the Consent Decree.


3. ACCORDINGLY, IT IS ORDERED that, pursuant to sections 4(i) of the Communications Act of 1934, as amended,<sup>1</sup> and sections 0.111 and 0.311 of the Commission's rules,<sup>2</sup> the Consent Decree attached hereto IS ADOPTED.

4. IT IS FURTHER ORDERED, that a copy of this *Order* and Consent Decree shall be sent by certified mail, return receipt requested to Levi E. Willis, Sr., President of the

<sup>1</sup> 47 U.S.C. §§ 154(i).

<sup>2</sup> 47 C.F.R. §§ 0.111, 0.311.

captioned licensees, 645 Church Street, Suite 400, Norfolk, VA 23510, with copies to the licensees' counsel, John C. Trent, Esq., Putbrese, Hunsaker & Trent, P.C., 100 Carpenter Drive, Suite 100, P.O. Box 217, Sterling, VA 20167-0217, Lauren A. Colby, Esq., Post Office Box 113, Frederick, MD 21705-0113, and Daniel A. Huber, Esq., 560 N Street, S.W., Suite 501, Washington, D.C. 20024.

**FEDERAL COMMUNICATIONS COMMISSION**

David H. Solomon  
Chief, Enforcement Bureau

**CONSENT DECREE****I. Introduction**

1. This Consent Decree is entered into by the Enforcement Bureau of the Federal Communications Commission and the following corporations, all of which are either wholly-owned or majority-controlled by Levi E. Willis, Sr., of Norfolk, Virginia: Willis Broadcasting Corporation; All-Channel TV Services, Inc.; Arkansas Radio Corp.; Birmingham Christian Radio, Inc.; Charlotte Christian Radio, Inc.; Christian Broadcasting Corporation; Durham Christian Radio, Inc.; Edenton Christian Radio, Inc.; Kinston Christian Radio, Inc.; Metro Communications, Inc.; Virginia Urban Radio, Inc.; Willis & Sons, Inc.; and Winston-Salem Broadcasting Corporation. The aforesaid corporations are the licensees of one or more radio broadcast stations, fully described in Table I, attached, which forms a part of this Consent Decree.

**II. Definitions**

2. For the purposes of this Consent Decree, the following definitions shall apply:
- a) "Willis" or the "Willis Companies" refer, collectively, to the corporations owned or controlled by Levi E. Willis, Sr., as described in paragraph 1, *supra*, and in Table I;
  - b) "Bureau" means the Enforcement Bureau of the Federal Communications Commission;
  - c) "Parties" means the Bureau and the Willis Companies;
  - d) "Willis Stations" means the radio broadcast stations licensed to the Willis Companies;
  - e) "NAL" means a Notice of Apparent Liability for Forfeiture;
  - f) "OSC" means an Order to Show Cause why the licenses of the Willis Stations or any of them should not be revoked, issued by the FCC pursuant to 47 U.S.C. § 312;
  - g) "Act" means the Communications Act of 1934, as amended, 47 U.S.C. Sections 151 et seq.;
  - h) "Order" means an order of the Bureau adopting this Consent Decree;
  - i) "Media Bureau" means the Media Bureau of the Federal Communications Commission;
  - j) "Commission" or "FCC" means the Federal Communications Commission;
  - k) "Effective Date" means the date on which the Bureau releases the Order; and
  - l) "Rules" means the Commission's regulations set forth in Title 47 of the Code of Federal Regulations;

- m) "HDO" means a Hearing Designation Order, issued by the FCC pursuant to 47 U.S.C. § 309.

### III. Background

3. Beginning in 1999, inspections of several Willis Stations by the Bureau's field staff revealed various apparent violations of Commission rules related to technical operation and public safety, which led to the issuance of forfeitures against the stations' respective licensees. Ultimately, litigation was instituted and a default judgment was entered against Willis Broadcasting Corp. for non-payment of the forfeitures. See United States v. Willis Broadcasting Corp., Civil Action No. 201CV342 (E.D. Va., June 22, 2001). Subsequently, additional judgments regarding similar unpaid forfeitures were obtained by the United States against Willis and against Christian Broadcasting Corporation, which is also controlled by Willis. The judgments against Willis, which totaled more than \$85,000 as of January 2004, remain unpaid. Willis also owes federal taxes as well as regulatory fees due to the Commission for its stations pursuant to 47 C.F.R. § 1.1153.

4. On October 28, 2003, the Bureau, pursuant to 47 C.F.R. § 1.88, wrote a pre-designation letter to Willis. The Bureau's letter advised that Bureau staff inspections of Willis Stations and subsequent events raised serious questions about Willis's qualifications to remain a licensee. Specifically, not only had the inspections revealed numerous, ongoing violations of the Commission's technical, safety and other rules, but also Willis had failed repeatedly to respond to official notices of violation or other correspondence from the Commission. The Bureau's letter provided Willis an opportunity to explain why it should be allowed to remain a licensee. A second letter, also dated October 28, 2003, sent by the Bureau to Willis, directed Willis to answer specific questions supported by appropriate documents as well as declarations under penalty of perjury.

5. By letters dated and filed January 23, 2004, Willis responded to the Bureau's letters. Among other things, Willis explained that the sole shareholder of the Willis Companies and its Chief Executive Officer, Levi E. Willis, Sr. ("Bishop Willis"), had a serious illness during which time he had not been properly able to attend to matters of concern to the Bureau. In addition, Bishop Willis declared that, since receipt of the Bureau's letters, he had made vigorous efforts to correct the violations. Information submitted with the Willis responses indicated that the violations cited in the Bureau's letters either had been corrected or that the licenses of the pertinent stations had been surrendered for cancellation. Subsequently, however, Bureau inspections or re-inspections of a number of the Willis Stations indicated that they were still in violation of the Rules and/or the terms of their licenses, albeit for violations other than those originally cited in the Bureau's October 28, 2003, letters.

6. Willis has pending two applications to assign the licenses for stations WWCA, Gary, Indiana (Facility ID #41332) (File No. BAL-20020730ABJ) and WJNS-FM, Yazoo City, Mississippi (Facility ID #72816) (File No. BALH-20030423AAS) (collectively, the "Assignment Applications"). Willis has proposed to apply the proceeds from the sale of those stations to satisfy the judgments noted above as well as any other unpaid forfeitures, regulatory fees and taxes.

### IV. Agreement

7. Willis agrees that the Bureau has jurisdiction over the matters contained in this Consent Decree and the authority to enter into and adopt this Consent Decree.

8. The Bureau and Willis agree that this Consent Decree does not constitute an adjudication on the merits or any finding on the facts or the law regarding any violations of the Act or the Rules committed by Willis, other than those matters that are the subject of judgments which have already been entered by United States federal district courts.

9. In express reliance upon the representations contained herein, the Bureau agrees to terminate its investigation into the matters discussed in paragraphs 3-5, above, except as hereafter specified.

10. Upon release of the Order, Willis will, within five (5) days, surrender for cancellation the licenses for the following four stations: KLRG, North Little Rock, Arkansas (ID #2778); KVLB, Vidalia, Louisiana (ID #32180); WCRY, Fuquay-Varina, North Carolina (ID #52645); and WSVE, Jacksonville, Florida (ID #10519).

11. As soon as possible after execution of the Consent Decree, it is anticipated that the Media Bureau will, if necessary for assignment purposes, grant Willis's pending license renewal applications for Stations WWCA, Gary, Indiana (ID #41332) and WJNS-FM, Yazoo City, Mississippi (ID #72816) and condition those renewals on the consummation of the assignment of the stations from Willis as contemplated in the Assignment Applications. Immediately thereafter, it is further anticipated that the Media Bureau will grant the Assignment Applications, conditioned upon consummation of such assignment within ten (10) days of their grant. If these assignments are not so consummated within the stipulated ten (10) day period, the renewal and assignment grants for Stations WWCA and WJNS-FM will be set aside and voided and, within five (5) days of such action by the Commission, Willis will simultaneously surrender for cancellation the licenses for those stations as well as the licenses for the following stations: KDLA, DeRidder, Louisiana (ID #9028); WGRM-FM, Greenwood, Mississippi (ID #11889); WBOK, New Orleans, Louisiana (ID #10917); WGPL, Portsmouth, Virginia (ID #69560); WNUZ, Talladega, Alabama (ID #54472); and WTJH, East Point, Georgia (ID #72814).

12. At the closing for the sales of Stations WWCA and WJNS-FM, all proceeds from the sales will be placed in escrow ("the Escrowed Funds") with Willis's attorneys, John C. Trent, Lauren A. Colby, and Daniel A. Huber ("the Escrow Agents"). The Escrowed Funds will be applied first to the payment in full of federal taxes, judgments obtained by the United States against Willis, FCC regulatory fees, and any other outstanding forfeitures leveled by the FCC against the Willis Companies, with such payment to be made by the Escrow Agents within ten (10) days of consummation of the assignment of the stations. The remainder of the Escrowed Funds will be applied to repairing the Willis Stations to bring them into compliance with the Rules and the terms and conditions of their licenses. No part of the Escrowed Funds will be used for any other purpose until Willis has certified to the Commission that its remaining stations are in compliance as described, *infra*. If the proceeds are not used in this manner, this Consent Decree (except for the remainder of this sentence) shall become void and, within five (5) days of the Commission's notice to Willis of such a state of affairs, Willis shall surrender for cancellation the licenses for Stations KDLA, DeRidder, Louisiana (ID #9028); WGRM-FM, Greenwood, Mississippi (ID #11889); WBOK, New Orleans, Louisiana (ID #10917); WGPL, Portsmouth, Virginia (ID #69560); WNUZ, Talladega, Alabama (ID #54472); and WTJH, East Point, Georgia (ID #72814).

13. Within sixty (60) days of the consummation of the assignments of the licenses for Stations WWCA and WJNS-FM as contemplated in the Assignment Applications, Willis will inspect Stations KDLA, DeRidder, Louisiana (ID #9028); WGRM-FM, Greenwood, Mississippi

(ID #11889); WBOK, New Orleans, Louisiana (ID #10917); WGPL, Portsmouth, Virginia (ID #69560); WNUZ, Talladega, Alabama (ID #54472); and WTJH, East Point, Georgia (ID #72814) and certify that each station is in compliance with all Rules and all terms and conditions of its license. The FCC's Broadcast Self-Inspection Checklists shall be used as a guide when conducting each inspection. (<http://www.fcc.gov/eb/bc-chklsts/>). For each station that Willis either fails or is unable to certify as being in compliance, Willis shall surrender for cancellation the license for that station at the time that such certification is due.

14. Within ninety (90) days of consummation of the assignment of the licenses for Stations WWCA and WJNS-FM as contemplated in the Assignment Applications, Willis will certify that all remaining stations under its control are in compliance with the Rules. The FCC's Broadcast Self-Inspection Checklists (<http://www.fcc.gov/eb/bc-chklsts/>) shall be used as a guide when conducting each inspection and review. Failure or inability to so certify will result in issuance of an NAL or HDO at the discretion of the FCC.

15. Renewal applications for all Willis Stations which have not yet been granted, except those for Stations WWCA and WJNS-FM which are discussed in paragraph 11, above, shall remain pending until FCC field staff has verified the validity of the certifications. Such verifications are to be undertaken as promptly as possible following the FCC's receipt of the certifications by Willis.

16. Every six (6) months thereafter for the remainder of the respective license term of each Willis Station, Willis will certify that the station is in compliance with the Rules. The FCC's Broadcast Self-Inspection Checklists (<http://www.fcc.gov/eb/bc-chklsts/>) shall be used as a guide when conducting each inspection and review. The failure by Willis to so certify will result in the Bureau's issuance of an NAL, OSC or similar document at its discretion.

17. All certifications referenced in paragraphs 13-16, above, shall be delivered to the Bureau within fourteen (14) days of the applicable execution deadline.

18. Willis agrees that any violation by it of the Consent Decree shall constitute a separate violation of a Commission order and subject Willis to appropriate administrative sanctions.

19. Willis waives any and all rights it may have to seek administrative or judicial reconsideration, review, appeal or stay, or to otherwise challenge or contest the validity of this Consent Decree and the Order, provided the Order adopts the Consent Decree without change, addition or modification.

20. Willis agrees to waive any claims it may otherwise have under the Equal Access to Justice Act, 5 U.S.C. Section 504 and 47 C.F.R. Section 1.1501 et seq., relating to the matters discussed in this Consent Decree.

21. Willis and the Bureau agree that the effectiveness of this Consent Decree is expressly contingent upon issuance of the Order, provided the Order adopts the Consent Decree without change, addition or modification.

22. Willis and the Bureau agree that if Willis, the Commission or the United States on behalf of the Commission, brings a judicial action to enforce the terms of the Order adopting this Consent Decree, neither Willis nor the Commission shall contest the validity of the Consent Decree or Order, and Willis and the Commission shall waive any statutory right to a trial de novo

with respect to any matter upon which the Order is based (provided in each case that the Order is limited to adopting the Consent Decree without change, addition, or modification), and shall consent to a judgment incorporating the terms of this Consent Decree.

23. Willis and the Bureau agree that, in the event that this Consent Decree is rendered invalid by any court of competent jurisdiction, it shall become null and void and may not be used in any manner in any legal proceeding.

24. This Consent Decree may be signed in counterparts and/or by telecopy and, when so executed, the counterparts, taken together, shall constitute a legally binding and enforceable instrument whether executed by telecopy or by original signatures.

WILLIS BROADCASTING CORPORATION  
ALL-CHANNEL TV SERVICES, INC.  
ARKANSAS RADIO CORP.  
BIRMINGHAM CHRISTIAN RADIO, INC.  
CHARLOTTE CHRISTIAN RADIO, INC.  
CHRISTIAN BROADCASTING CORPORATION  
DURHAM CHRISTIAN RADIO, INC.  
EDENTON CHRISTIAN RADIO, INC.  
KINSTON CHRISTIAN RADIO, INC.  
METRO COMMUNICATIONS, INC.  
VIRGINIA URBAN RADIO, INC.  
WILLIS & SONS, INC.  
WINSTON-SALEM BROADCASTING CORPORATION

WITNESS:

By: \_\_\_\_\_  
Levi E. Willis, Sr., President

Date: \_\_\_\_\_

ENFORCEMENT BUREAU  
FEDERAL COMMUNICATIONS COMMISSION

By: David H. Solomon  
David H. Solomon, Chief

Date: 6/14/04



FROM : BISHOP LE WILLIS

FAX NO. : 757-627-8879  
Lauren N. Colby

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LAUREN N. COLBY

**301 - 695 - 8734**

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**Federal Communications Commission**

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with respect to any matter upon which the Order is based (provided in each case that the Order is limited to adopting the Consent Decree without change, addition, or modification), and shall consent to a judgment incorporating the terms of this Consent Decree.

23. Willis and the Bureau agree that, in the event that this Consent Decree is rendered invalid by any court of competent jurisdiction, it shall become null and void and may not be used in any manner in any legal proceeding.

24. This Consent Decree may be signed in counterparts and/or by telecopy and, when so executed, the counterparts, taken together, shall constitute a legally binding and enforceable instrument whether executed by telecopy or by original signatures.

**WILLIS BROADCASTING CORPORATION  
ALL-CHANNEL TV SERVICES, INC.  
ARKANSAS RADIO CORP.  
BIRMINGHAM CHRISTIAN RADIO, INC.  
CHARLOTTE CHRISTIAN RADIO, INC.  
CHRISTIAN BROADCASTING CORPORATION  
DURHAM CHRISTIAN RADIO, INC.  
EDENTON CHRISTIAN RADIO, INC.  
KINSTON CHRISTIAN RADIO, INC.  
METRO COMMUNICATIONS, INC.  
VIRGINIA URBAN RADIO, INC.  
WILLIS & SONS, INC.  
WINSTON-SALEM BROADCASTING CORPORATION**

**WITNESS:**

By

**Levi E. Willis, Sr., President**

Date: 6-11-02

**ENFORCEMENT BUREAU  
FEDERAL COMMUNICATIONS COMMISSION**

By:

**David H. Solomon, Chief**

Date:

Call Sign	Service	Location	Facility ID No.	Licensee Name
KLRG	AM	North Little Rock, Arkansas	2778	Arkansas Radio Corporation
KVLA	AM	Vidalia, Louisiana	32180	Willis Broadcasting Corporation
WCRY	AM	Fuquay-Varina, North Carolina	52645	Durham Christian Radio, Inc.
WSVE	AM	Jacksonville, Florida	10519	Willis & Sons, Inc.
WWCA	AM	Gary, Indiana	41332	Metro Communications, Inc.
WJNS-FM	FM	Yazoo City, Mississippi	72816	Willis Broadcasting Corporation
KDLA	AM	De Ridder, Louisiana	9028	Willis Broadcasting Corporation
WGRM	AM	Greenwood, Mississippi	68577	Willis Broadcasting Corporation
WGRM-FM	FM	Greenwood, Mississippi	11889	Willis Broadcasting Corporation
WBOK	AM	New Orleans, Louisiana	10917	Christian Broadcasting Corporation
WGPL	AM	Portsmouth, Virginia	69560	Virginia Urban Radio, Inc.
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WBTE	AM	Windsor, North Carolina	172	Willis Broadcasting Corporation
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WSDT	AM	Soddy-Daisy, Tennessee	31863	Willis Broadcasting Corporation
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WELS	FM	Kinston, North Carolina	20409	Kinston Christian Radio, Inc.
WGSP	AM	Charlotte, North Carolina	10631	Charlotte Christian Radio, Inc.
WCPK	AM	Chesapeake, Virginia	64003	Winston-Salem Radio Corporation