

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

In the Matter of)
)
L4 Media Group, LLC) File No. BRTTA-20130201BCV
Application for Renewal of License for Digital) NAL/Acct. No. 201841420004
Class A Television Station) FRN No. 0014037857
KBXS-CD, Shreveport, Louisiana) Facility ID No. 70420

ORDER

Adopted: May 23, 2018

Released: May 23, 2018

By the Chief, Media Bureau:

1. In this Order, we adopt the attached Consent Decree between the Media Bureau (Bureau) of the Federal Communications Commission (Commission) and L4 Media Group, LLC (Licensee or L4). The Consent Decree resolves issues raised in the Bureau staff’s review of the above-captioned application for license renewal for station KBXS-CD, Shreveport, Louisiana (KBXS-CD or Station), specifically, KBXS-CD’s compliance with: (1) Section 73.3526(e)(11)(i) of the Commission’s rules (Rules),¹ which requires stations to prepare and place in their local public inspection file TV issues/programs lists on a quarterly basis; (2) Section 73.3526(e)(11)(ii) of the Rules,² which requires a broadcast station to prepare and place in its public inspection file a quarterly certification demonstrating compliance with the Commission’s children’s programming commercial limits; (3) Section 73.3526(e)(11)(iii) of the Rules,³ which requires each licensee to prepare and place in its public inspection file a Children’s Television Programming Report (FCC Form 398) on a quarterly basis; and (4) Section 73.2526(e)(17) of the Rules, which requires Class A stations to provide documentation demonstrating the station’s ongoing compliance with its Class A obligations. L4 also twice failed to respond to written requests for information from staff concerning these potential violations.⁴

2. After reviewing its terms, we find that our adoption of the attached Consent Decree would serve the public interest. We conclude that the Consent Decree contains appropriate terms and conditions, and after reviewing the record before us, we believe that the grant of a short-term renewal is appropriate in order to ensure the Licensee’s ongoing compliance with the Communications Act of 1934, as amended (Act),⁵ and the Rules. Accordingly, Media Bureau staff shall grant the renewal application, File No. BRTTA-20130201BCV, pursuant to Section 309(k)(2) the Act with a license expiration date of June 1, 2021.⁶ Grant shall be conditioned upon L4 fully and timely satisfying its obligation to pay the

¹ 47 CFR § 73.3526(e)(11)(i).

² 47 CFR § 73.3526(e)(11)(ii).

³ 47 CFR § 73.3526(e)(11)(iii).

⁴ 47 CFR § 73.3526(e)(17).

⁵ Communications Act of 1934, as amended, Pub. L. No. Pub L. No 73-416, 448 Stat. 1064 (codified at 47 U.S.C. § 151 et seq.).

⁶ Section 309(k)(1) of the Act states that the Commission shall grant a license renewal application “if it finds, with respect to that station, during the preceding term of its license – (a) the station has served the public interest, convenience, and necessity; (b) there have been no other violations by the licensee of the Act or Commission Rules or regulations; and (c) there have been no other violations by the licensee of the Act or Commission rules or

Civil Penalty as laid out in the Consent Decree. A copy of the Consent Decree is attached hereto and incorporated by reference.

3. Accordingly, **IT IS ORDERED** that, pursuant to Section 4(i) of the Communications Act of 1934, as amended,⁷ and by the authority delegated by Sections 0.61 and 0.283 of the Commission's rules,⁸ the attached Consent Decree **IS ADOPTED**.

4. **IT IS FURTHER ORDERED** that the Bureau's investigation into the matters discussed above **IS TERMINATED**.

5. **IT IS FURTHER ORDERED** that, pursuant to Section 309(k)(2) of the Communications Act of 1934, as amended,⁹ the license renewal application, File No. BRTTA-20130201BCV, **IS GRANTED** as conditioned herein.

6. **IT IS FURTHER ORDERED** that a copy of this Order and Consent Decree shall be sent by both First-Class mail and Certified Mail, Return Receipt Requested, to L4 Media Group, 200 South Wacker, Suite 2450, Chicago, IL and to its counsel Davina Sashkin, Esq., Fletcher, Heald & Hildreth, PLC, 1300 N. 17th Street, 11th Floor, Arlington, VA 22209.

FEDERAL COMMUNICATIONS COMMISSION

Michelle M. Carey
Chief, Media Bureau

regulations, which, taken together, would constitute a pattern of abuse.” 47 U.S.C. § 309(k)(1). Section 309(k)(2) of the Act states, however, that if the licensee fails to meet this three-part standard, the Commission may deny the application – after notice and comment, and opportunity for hearing under Section 309(e) of the Act – “. . . or grant the application on terms and conditions as are appropriate, including renewal for a term less than the maximum otherwise permitted.” 47 U.S.C. § 309(k)(2). See *Shareholders of Univision Communications Inc. et al.*, Memorandum Opinion and Order, 22 FCC Rcd 5842, 5859, n.113 (2007) (“Given our finding that the grant of the renewal application is warranted under Section 309(k)(2) of the Act because the consent decree contains appropriate terms and conditions, we need not determine whether Univision committed ‘serious violations’ of our rules or violations that constituted ‘a pattern of abuse’ for purposes of Section 309(k)(1).”)

⁷ 47 U.S.C. § 154(i).

⁸ 47 CFR §§ 0.61, 0.283.

⁹ 47 U.S.C. § 309(k)(2).

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L4 Media Group, LLC)	File No. BRTTA-20130201BCV
Application for Renewal of License for Digital)	NAL/Acct. No. 201841420004
Class A Television Station)	FRN No. 0014037857
KBXS-CD, Shreveport, Louisiana)	Facility ID No. 70420

CONSENT DECREE

1. The Media Bureau (Bureau) of the Federal Communications Commission (Commission) and L4 Media Group, LLC (L4 or Licensee), licensee of full power station KBXS-CD, Shreveport, Louisiana, hereby enter into this Consent Decree for the purposes of: (1) resolving the Bureau's investigation of L4's compliance with Sections 73.3526(e)(11)(i), 73.3526(e)(11)(ii), 73.3526(e)(11)(iii), and 73.3526(e)(17) of the Commission's rules;¹ (2) L4's failure to respond to Commission staff requests for information; and (3) facilitating the grant of L4's above-captioned pending license renewal application.

I. DEFINITIONS

2. For the purposes of this Consent Decree and Compliance Plan, the following definitions shall apply:

- a) "Act" means the Communications Act of 1934, as amended, 47 U.S.C. § 151 *et seq.*
- b) "Adopting Order" means the Order of the Commission adopting the terms of this Consent Decree without change, addition, deletion, or modification.
- c) "Bureau" means the Media Bureau of the Federal Communication Commission.
- d) "Class A Eligibility Certification" means documentation demonstrating compliance with the Station's ongoing Class A requirements pursuant to 47 CFR § 73.6001 *et seq.*, as required by 47 CFR § 73.3526(e)(17).
- e) "Commercial Limits Certification" means documentation demonstrating compliance with the Commission's commercial limit rules pursuant to 47 CFR § 73.670, as required by 47 CFR § 73.3526(e)(11)(ii).
- f) "Commission" or "FCC" means the Federal Communications Commission and all of its bureaus and offices.
- g) "Communications Laws" means, collectively, the Act, the Rules, and the published and promulgated orders and decisions of the Commission including, but not limited to, 47 CFR §§ 73.3526(e)(11)(i), 73.3526(e)(11)(ii), 73.3526(e)(11)(iii), and 73.3526(e)(17).
- h) "Division" means the Video Division of the Media Bureau.
- i) "Effective Date" means releases date of the Adopting Order.
- j) "Investigation" means the Media Bureau's investigation of L4's potential violations of 47 CFR §§ 73.3526(e)(11)(i), 73.3526(e)(11)(ii), 73.3526(e)(11)(iii), and 73.3526(e)(17).

¹ 47 CFR §§ 73.3526(e)(11)(i), 73.3526(e)(11)(ii), 73.3526(e)(11)(iii), and 73.3526(e)(17).

- k) “License Renewal Application” means the license renewal application of station KBXS-CD, Shreveport, Louisiana, File No. BRTTA-20130201BCV.
- l) “Parties” means L4 and the Bureau acting under delegated authority, each of which is a “Party.”
- m) “Public file” or “e-pif” refers to the documents a Class A television broadcast station is required to maintain as part of its local public inspection file, as required by Section 73.3526 of the Rules.
- n) “Rules” means the Commission’s regulations found in Title 47 of the Code of Federal Regulations.
- o) “Station” means the Class A broadcast television station KBXS-CD, Shreveport, Louisiana.
- p) “L4” or “Licensee” means L4 Media Group, LLC and its subsidiaries, affiliates, successors, assigns, and/or transferees.

II. BACKGROUND

3. On February 5, 2013, L4 timely filed its License Renewal Application for the Station. In its License Renewal Application, L4 disclosed that during the proceeding license term it failed to fully comply with the Commission’s public file requirements.² A Division staff review of the Station’s e-pif confirmed that in fact numerous documents were either missing or not timely filed.

4. On March 12, 2013, the Division sent a letter to L4 indicating that it failed to, and must within 10 days, upload its station’s main studio address, issues and programs lists, or an explanation as to why they have not been uploaded, and Class A continuing eligibility certifications.³ No response was received. Subsequently, on October 22, 2013, the Division sent a second letter under Section 1.88⁴ requesting that the Licensee provide information again regarding the station’s missing and late filed public file documents and instructing it to provide an explanation for this failure and upload such documents.⁵ Again no response was received. Following a discussion with counsel for KBXS-CD, once more requesting information concerning the missing and late filed public file documents, L4 uploaded all missing documents in February and September 2015.

5. Since acquiring the Station in September 2005, L4 admits to the staff that it has failed to prepare and is unable to recreate TV issues/programs lists for 16 quarters. L4 also admits that during the prior license term it has failed to timely prepare and place various public file documents into the Station’s public file, including (1) its TV issues/programs lists for 23 quarters, (2) Class A certifications for 39 quarters; and (3) commercial limit certifications for 40 quarters. L4 also has failed to file in a timely manner its Children’s Television Programming Reports for a total of 25 quarters. While L4 contends that it did not receive copies of the requests for information from Division staff, it does not dispute that the letters were sent to the proper address of record and acknowledges that copies of the letters were placed in the Station’s facility file in the Commission’s Consolidated Database System (CDBS).

² See License Renewal Application, Exhibits 14 and 20.

³ Letter from Hossein Hashemzadeh, Deputy Chief, Video Division, Media Bureau to L4 Media Group, LLC (Mar. 12, 2013).

⁴ Under Section 1.88, “the license may file a written statement to the Commission setting forth its views regarding matters under investigation.”

⁵ Letter from Hossein Hashemzadeh, Deputy Chief, Video Division, Media Bureau to L4 Media Group, LLC (Oct. 22, 2013).

6. Section 73.3526 of the Rules requires each Class A broadcast licensee to maintain a public file containing information related to its station's operations. Section 73.3526(e)(11)(i) of the Rules requires every broadcast television licensee to place in its public file, on a quarterly basis, a TV issues/programs list which details programs that have provided the station's most significant treatment of community issues during the preceding three-month period and must include a brief narrative of the issue addressed, as well as the time, date, duration, and title of each program that addressed the issue. Section 73.3526(e)(11)(ii) of the Rules requires each such licensee to prepare and place in its public inspection file, on a quarterly basis, records sufficient to substantiate the Station's certification, in its license renewal application, of compliance with the commercial limits on children's programming. Section 73.3526(e)(11)(iii) of the Rules requires each such licensee to prepare and place in its public inspection file a Children's Television Programming Report (FCC Form 398) for each calendar quarter reflecting, *inter alia*, the efforts it made during that quarter to serve the educational and informational needs of children. Copies of these documents must be retained until final action on the station's next license renewal application. Additionally, Section 73.3526(e)(17) requires Class A stations to place in their public files documents sufficient to demonstrate that the Class A television station is continuing to meet the eligibility requirements set forth in Section 73.6001 of the Rules.

7. In 2012, the Commission adopted Section 73.3526(b) of the Rules, which requires licensees, including Class A stations, to upload elements of a station's physical public file to an on-line Commission hosted website (*i.e.*, a station's e-pif or electronic public file).⁶ The Commission's e-pif requirement was implemented as a means to modernize the way television broadcasters "inform the public about how they are serving their communities..."⁷ Broadcasters' e-pif requirements were phased in between August 2012 and February 2013. Beginning August 2, 2012, stations were required to post any document that would otherwise be placed in a station's public file, with limited exceptions, to their e-pif on a going-forward basis. By February 4, 2013, stations were required, with limited exceptions, to upload to their e-pif those documents that were already in their physical public file prior to August 2, 2012.⁸ Under Section 73.3526(b)(2) of the Rules, copies of a Station's Commercial Limit Certifications and TV issues/programs lists, and Class A Eligibility Certifications, among other items, must be placed in its e-pif.

8. The Bureau and L4 have negotiated the terms of the Consent Decree that terminates the Investigation into the matters raised in this proceeding. As part of the Consent Decree, L4 has agreed to pay a Civil Penalty in the amount of Fifty Thousand Dollars (\$50,000) to the U.S. Treasury, be granted a renewal with an expiration date of June 1, 2021, and to implement and maintain a Compliance Plan designed to ensure its future compliance with the Act and Commission's rules and regulations, including those discussed above.

⁶ See *Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations, Extension of the Filing Requirement for Children's Television Programming Report*, Second Report and Order, 27 FCC Rcd 4535 (2012) ("*Second R&O*") (requiring broadcast television stations to post their public inspection files, with limited exceptions, to an online Commission-hosted database).

⁷ *Second R&O*, 27 FCC Rcd at 4536, para. 1.

⁸ See *Effective Date Announced for Online Publication of Broadcast Television Public Inspection Files*, Public Notice, 27 FCC Rcd 7478 (2012) (announcing effective date of electronic public file rule); *Television Broadcast Stations Reminded of Their Online Public Inspection File Obligations*, Public Notice, 27 FCC Rcd 15315 (2012) (reminding station's to upload copies of existing public file documents to their electronic public file); *Television Broadcast Stations Reminded of the Upcoming Public Inspection Filing Deadline*, Public Notice, 28 FCC Rcd 429 (2013) (providing a final reminder to broadcasters to upload copies of existing public file documents to their electronic public file); see *Second R&O*, 27 FCC Rcd at 4580, paras. 97-98 (establishing compliance periods for complying with broadcasters new electronic public file requirement).

III. TERMS OF THE AGREEMENT

9. Adopting Order. The Parties agree that the provisions of this Consent Decree shall be incorporated by reference by an Adopting Order without change, addition, deletion, or modification.

10. Jurisdiction. L4 agrees that the Commission has jurisdiction over it and the matters contained in this Consent Decree, and that the Bureau has the authority to enter into and adopt this Consent Decree.

11. Effective Date. The Parties agree that this Consent Decree shall become effective on the Effective Date as defined herein. As of the Effective Date, the Adopting Order and this Consent Decree shall have the same force and effect as any other order of the Commission.

12. Violations. The Parties agree that any violation of the Adopting Order or of the terms of this Consent Decree shall constitute a separate violation of a Commission order, entitling the Commission to exercise any rights and remedies attendant to the enforcement of a Commission order.

13. Termination of Investigation; Grant of Renewal Application. In express reliance on the covenants and representations in this Consent Decree, and to avoid further expenditure of public resources, the Bureau agrees to terminate the Investigation. In consideration for the termination of the Investigation, L4 agrees to the terms and conditions contained herein. The Bureau further agrees to grant, absent any other restrictions, in conjunction with the adoption of this Consent Decree, the License Renewal Application until June 1, 2021. In consideration for the termination of the Investigation, L4 agrees to the terms, conditions, and procedures contained herein, including the actions specified in Paragraphs 15 and 18 of this Consent Decree. Grant of the License Renewal Application is expressly conditioned on L4 fully and timely satisfying its obligation to make a total Civil Penalty Payment in the amount of Fifty Thousand Dollars (\$50,000) in the manner specified in paragraph 15 of this Consent Decree. The Bureau further agrees that, in the absence of new material evidence or failure by L4 to satisfy the terms and conditions set forth in paragraphs 15 and 18 of the Consent Decree, it will not use the facts developed, in whole or in part, from the Investigation through the Effective Date, or the existence of this Consent Decree, to institute on its own motion any proceedings, formal or informal, or take any action on its own motion against L4 concerning the matters that were the subject of the Investigation. Nor will the Bureau take any action in response to any petition to deny, complaint, or objection against L4 concerning the matters that were the subject of the Investigation. The Bureau also agrees that, in the absence of new material evidence or failure by L4 to satisfy the terms and conditions set forth in paragraphs 15 and 18 of this Consent Decree, it will not use the facts developed in this Investigation through the Effective Date, or the existence of this Consent Decree, to institute on its own motion any proceeding, formal or informal, or take any action in response to any petition to deny, complaint, or objection against L4 with respect to its basic qualifications, including its character qualifications, to be a Commission licensee or to hold Commission licenses or authorizations.

14. Subsequent Investigations. Except as expressly provided herein, this Consent Decree shall not prevent the Bureau or Commission from investigating new evidence of noncompliance by L4 with the Communications Laws. Nothing in this Consent Decree shall prevent the Commission or its delegated authority from adjudicating complaints or other adjudicatory pleadings filed against L4 for alleged violations of the Act or the Commission's rules or for any alleged misconduct, regardless of when such misconduct took place, subject to the limitations set forth in Paragraph 13 of this Consent Decree. The Bureau or the Commission's adjudication of any such complaints or pleadings will be based solely on the record developed in subsequent proceedings.

15. Civil Penalty. L4 will pay a civil penalty to the United States Treasury in the amount of Fifty Thousand Dollars (\$50,000) due in three separate installment payments. The first installment payment of \$20,000 is due within 30 days of the Effective date of this Consent Decree. The second payment in the amount of \$15,000 is due on or before November 1, 2018. The third and final installment

payment of \$15,000 is due on or before May 1, 2019. The Licensee agrees that if the Station is assigned or transferred to an unrelated third party that any remaining payment on the balance of the Civil Penalty must be made within thirty (30) days following consummation and any grant may be conditioned upon such payment. L4 agrees that upon execution of this Consent Decree the Civil Penalty shall become a “Claim” or “Debt” as defined in 31 U.S.C. § 3701(b)(1). L4 shall send electronic notification of payment to Varsha Mangal at varsha.mangal@fcc.gov on the date said payments are made. All payments must be made by check or similar instrument, wire transfer, or credit card, and must include the FRN captioned above. An FCC Form 159 (Remittance Advice) must be submitted with payment, unless payment is made online at the Commission’s Fee Filer website.⁹ When completing FCC Form 159, enter the Account Number in block number 23A (call sign/other ID) and enter the letters “FORF” in block number 24A (payment type code). Below are additional instructions that L4 should follow based on the form of payment it selects:¹⁰

- Payment by check or money order must be made payable to the order of the Federal Communications Commission. Such payments (along with the completed Form 159) must be mailed to Federal Communications Commission, P.O. Box 979088, St. Louis, MO 63197-9000, or sent via overnight mail to U.S. Bank – Government Lockbox #979088, SL-MO-C2-GL, 1005 Convention Plaza, St. Louis, MO 63101.
- Payment by wire transfer must be made to ABA Number 021030004, receiving bank TREAS/NYC, and Account Number 27000001. To complete the wire transfer and ensure appropriate crediting of the wired funds, a completed Form 159 must be faxed to U.S. Bank at (314) 418-4232 on the same business day the wire transfer is initiated.
- Payment by credit card must be made by providing the required credit card information on FCC Form 159 and signing and dating the Form 159 to authorize the credit card payment. The completed Form 159 must then be mailed to Federal Communications Commission, P.O. Box 979088, St. Louis, MO 63197-9000, or sent via overnight mail to U.S. Bank – Government Lockbox #979088, SL-MO-C2-GL, 1005 Convention Plaza, St. Louis, MO 63101.

16. Waivers. As of the Effective Date, L4 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 Adopting Order. L4 shall retain the right to challenge the Commission’s interpretation of the Consent Decree or any terms contained herein. If either Party (or the United States on behalf of the Commission) brings a judicial action to enforce the terms of the Adopting Order, neither L4 nor the Commission shall contest the validity of the Consent Decree or the Adopting Order, and L4 shall waive any statutory right to a trial *de novo*. L4 hereby agrees to waive any claims it may have under the Equal Access to Justice Act, 5 U.S.C. § 504 and 47 CFR § 1.1501 *et seq.*, relating to the matters addressed in this Consent Decree. Notwithstanding any provision of this Consent Decree or the Adopting Order, the Bureau may consider this Consent Decree void and of no further force if the condition specified in Paragraph 15 is not fully and timely satisfied by L4.

17. Admission of Liability. L4 admits, for the purposes of this Consent Decree and the Commission’s civil enforcement, and in express reliance on the provisions of paragraph 13 herein, to the facts discussed in Paragraphs 3 through 7 regarding its failure to meet the requirements of Sections

⁹ Payment may be made online at the Commission’s Fee Filer website: <https://www.fcc.gov/encyclopedia/fee-filer>. Online payments do not require payors to submit FCC Form 159. Alternatively, payment may be made using FCC Form 159; detailed instructions for completing the form may be obtained at <http://www.fcc.gov/Forms/Form159/159.pdf>.

¹⁰ For questions regarding payment procedures, please contact the Financial Operations Group Help Desk by phone at 1-877-480-3201, or by e mail at ARINQUIRIES@fcc.gov.

73.3514 and 73.3526 of the Rules. By entering into this Consent Decree, L4 makes no other admission of liability or violation of any law, regulation or policy, and the Commission makes no finding of any such liability or violation.

18. Compliance Plan. In recognition that L4's policies and practices regarding compliance with 73.3514(a) and 73.3526 of the Rules can be enhanced to ensure compliance in the future, L4 agrees to implement the attached Compliance Plan at the Station and at any station currently licensed to or acquired by L4. L4 agrees, to the extent that it has not already done so, to implement the Compliance Plan within thirty (30) calendar days following the Effective Date and to keep such Compliance Plan in effect until Commission action on the Station's next license renewal application is final.

19. Severability. Parties agree that if any of the provisions of the Consent Decree shall be held unenforceable by any court of competent jurisdiction, such unenforceability shall not render unenforceable the entire Consent Decree, but rather the entire Consent Decree shall be construed as if not containing the unenforceable provision or provisions, and the rights and obligations of the Parties shall be construed and enforced accordingly.

20. Invalidity. If this Consent Decree, in its entirety, 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.

21. Subsequent Rule or Order. The Parties agree that if any provision of the Consent Decree conflicts with any subsequent rule or order adopted by the Commission (except an order specifically intended to revise the terms of the Consent Decree to which L4 expressly consents), that provision will be superseded by such rule or Commission order. A conflict will be considered to have arisen if the L4 is unable to comply with both the terms and conditions of this Consent Decree and the Communications Laws, as amended.

22. Successors and Assigns. L4 agrees that the provisions of this Consent Decree shall be binding on its subsidiaries, affiliates, successors, assigns, and/or transferees.

23. Final Settlement. The Parties agree and acknowledge that this Consent Decree shall constitute a final settlement between the Parties with respect to the Investigation.

24. Modifications. This Consent Decree cannot be modified without the advance written consent of all Parties.

25. Paragraph Headings. The headings of the paragraphs in this Consent Decree are inserted for convenience only and are not intended to affect the meaning or interpretation of this Consent Decree.

26. Authorized Representative. Each Party represents and warrants to the other that it has full power and authority to enter into this Consent Decree. Each person signing this Consent Decree on behalf of a Party hereby represents that he or she is fully authorized by the Party to execute this Consent Decree and to bind the Party to its terms and conditions.

27. Counterparts. This Consent Decree may be signed in any number of counterparts, each of which, when executed and delivered (including by pdf or facsimile), shall be an original, and all of which counterparts together shall constitute one and the same fully executed instrument.

Federal Communications Commission

By:

Michelle M. Carey
Chief, Media Bureau

Date

L4 Media Group, LLC

By:

Scott Saldana
Manager

Date

COMPLIANCE PLAN OF L4 MEDIA GROUP, LLC

To ensure future compliance with the Rules and the Act, L4 will institute the following procedures at the Station and for any television broadcast station that is licensed or subsequently acquired by L4. Unless otherwise provided, all terms defined in Paragraph 2 of this Consent Decree shall apply to this Compliance Plan. The terms of this Compliance Plan shall remain in effect until action on the Station's next license renewal application is final.

1. L4 will designate a Compliance Officer responsible for responding to employee questions, consulting with Federal Communications Commission counsel regarding compliance matters, and ensuring all stations operate in compliance with the Rules and the Act, including but not limited to Sections 73.3514(a) and 73.3526 of the Rules. The name and contact information for the Compliance Officer shall be listed in a document and placed in the Station's electronic public file under the folder entitled "FCC Investigations or Complaints."

2. To ensure compliance with the Commission's related rules and policies, the Compliance Officer will oversee, as applicable, the preparation and filing of all public file documents, the maintenance of its physical and electronic public files, the preparation and filing of all other required FCC Forms and applications, and the payment of any applicable filing and regulatory fees.

3. The Compliance Officer will conduct training for all station employees and management at least once every twelve (12) months on compliance with the Rules applicable to his or her duties at the Station, or, if the Station has no employees or non-principal management, shall consult with outside communications counsel and the managing member of the Licensee on compliance with the Rules applicable generally to the Station at least once every twelve (12) months. The first training or consultation, as applicable, shall occur within thirty (30) days of the Effective Date. A certification that the aforementioned training or consultation, as applicable, has occurred shall be placed in e-pif for the Station within three (3) business days.

4. The Compliance Officer will be responsible for remaining up-to-date on all developments in communications law that are applicable to the Station and its operations. This may include consultation with an outside third-party, such as legal counsel, in order to obtain guidance on Commission compliance issues as well as review all applications, documents, and reports prior to filing with the Commission. Regarding the last matter, L4 recognizes and acknowledges that any and all information provided to the Commission must completely and candidly set forth all relevant facts and circumstances regardless of whether such submission may disclose a violation of the Rules or the Act.