

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

In re Application of) NAL/Acct. No. MB201341410005
) FRN 0011579315
WILLIAM PENN UNIVERSITY)
) File No. BRED-20121001AUZ
Licensee of Station KIGC(FM))
) Facility ID No. 72710
Oskaloosa, Iowa)

POLICY STATEMENT AND ORDER

Adopted: May 13, 2013

Released: May 13, 2013

By the Chief, Media Bureau:

I. INTRODUCTION

1. We herein adopt the attached Consent Decree entered into by the Media Bureau (the "Bureau") and William Penn University (the "University"), licensee of KIGC(FM), Oskaloosa, Iowa (the "Station"), a noncommercial educational ("NCE") radio station operated by students of the University. The Consent Decree resolves issues arising from the Bureau's review of the captioned license renewal application (the "Renewal Application") for the Station, including whether the University violated Sections 73.3527 and 73.3615(d) of the Commission's Rules (the "Rules").

2. The Consent Decree effectuates a new policy that the Bureau has applied in this case and will hereafter apply to first-time violations of certain documentation requirements of our Rules by student-run NCE radio stations, as defined herein. Under this new policy as further described below, instead of issuing a Notice of Apparent Liability ("NAL"), the Bureau will first afford the licensee an opportunity to negotiate a consent decree in which the licensee agrees to a compliance plan and makes a voluntary contribution to the United States Treasury. In negotiating the amount of the voluntary contribution, the Bureau will consider the totality of circumstances, including giving appropriate consideration to the station's finances with respect to reducing the base forfeiture amount significantly.

II. POLICY STATEMENT

A. Background

3. There are nearly 3,800 licensed NCE FM radio stations in the country. Of these, fewer than 500 are student-run stations. Student-run radio stations play a unique role because they are

1 47 C.F.R. §§ 73.3527 (the "Public File Rule"), 73.3615(d)(the "Ownership Reporting Rule").

2 For purposes of this policy, a student-run station is a radio station licensed as an NCE station to an educational institution or an entity under the control of an educational institution and which is staffed completely by student volunteers, rather than partially or predominantly by students. Stations that employ any professional staff, other than a faculty advisor, will not qualify for a consent decree under the policy announced today, even if they meet all the other criteria. See, e.g., Southern Adventist University, Forfeiture Order, 26 FCC Rcd 11254 (MB 2011) (\$8,000 (footnote continued)

incubators for talent as well as media outlets. They rely on student volunteers for all management, operational and programming functions and provide those students with training and experience in radio programming, production and station operations as a supplement to the educational curriculum of the school.³ Student volunteers at these stations are young and unlikely to have had any work experience in regulatory compliance matters, particularly those involving the FCC requirements to which NCE stations are subject. As students leave the school or assume other responsibilities that conflict with their time devoted to station activities, new student volunteers must be recruited and trained on an ongoing basis by the remaining students, often without any professional oversight other than that provided by faculty advisors. Faculty advisors typically have limited time available to devote to the student-run radio station due to their other educational responsibilities.⁴ Likewise, the student volunteers who manage the stations are also managing their own course loads. Adding to these challenges, student-run stations frequently operate with very limited annual operating budgets, in some cases less than the Commission's base forfeiture amount for a single public inspection file violation.⁵

4. The University's operation of the Station is a good example of the important role that an NCE radio station can play in the educational mission of a school. The University is a small liberal arts institution of higher learning founded by Quakers and located in Oskaloosa, Iowa. The University's mission statement calls for an educational experience with a focus on leadership, technology, and the Quaker principles of simplicity, peacemaking, integrity, community, and equality. To advance the school's commitment to technology education, the University has been the licensee of the Station for more than 30 years. The University makes use of the Station in conjunction with its digital communications degree program, which affords students the opportunity to learn the skills needed for employment in both traditional and new media.⁶ The Station is staffed entirely by students and overseen by a faculty advisor.⁷ In recent years, the Station's annual budget was \$7,000, but this year it was reduced to \$6,650, which reflects an across-the-board five percent reduction for many University operations.⁸ The Station transmits its signal with less than 250 watts of power.

5. In the last two years, the Bureau and the Commission's Enforcement Bureau

forfeiture imposed on NCE FM station that uses students for all programming and production but employs a professional managerial staff of three).

³ We use the term "student volunteers" to include those who receive educational credit or work/study stipends for work at a student-run station, as well as those who receive no credit or stipend. In this case, the University relies entirely on approximately 19 student volunteers to run the Station, only two of whom receive work/study stipends. *See* Renewal Application, Ex. 12.

⁴ For example, the Station's faculty advisor also carries an overload teaching schedule (15 credit hours in the first semester of the University's 2012-13 school year). *See* Renewal Application, Ex. 12.

⁵ *See* 47 C.F.R. §1.80(b)(8), Section I (\$10,000 base forfeiture amount for Public File Rule violation).

⁶ *See* Renewal Application, Ex. 12.

⁷ The current faculty advisor joined the faculty last Fall and discovered the violations that are the subject of the Consent Decree. Over the license term, there were three successive faculty advisors prior to the current one. *See* Renewal Application, Ex. 12.

⁸ *See* Letter from David Oxenford, Esq. to Peter Doyle (Feb. 11, 2013).

(collectively, the “Bureaus”) have issued multiple orders proposing or assessing forfeitures from \$8,000 to \$10,000 to the licensees of student-run NCE stations for the types of Rule violations covered by this new enforcement policy.⁹ In the current radio license renewal cycle, it is possible that similar violations by student-run stations will be discovered and disclosed. At the same time, increasing numbers of educational institutions facing daunting fiscal challenges have made the difficult decision to sell their valuable NCE radio stations. For example, in recent years, the University of San Francisco, Duquesne University in Pittsburgh, Barry University in Miami and Bard College in the Hudson River Valley have sold their stations.¹⁰ The University’s budget reduction, described above, likewise illustrates the financial challenges that schools face. We are concerned that imposing forfeitures at levels that are likely to exceed the annual budgets of student-run radio stations could exacerbate this trend, foreclosing opportunities for the education, training and real-world experience of current and future student volunteers by these stations.¹¹

6. In assessing potential forfeitures, Section 503(b)(2)(E) of the Communications Act of 1934, as amended (the “Act”), requires us to consider factors including “the nature, circumstances, extent, and gravity of the violation and, with respect to the violator, the degree of culpability, any history of prior offenses, ability to pay, and such other matters as justice may require.”¹² Section 1.80 of the Rules codifies this requirement and sets forth baseline forfeiture amounts for common types of violations, and upward and downward adjustment criteria for such forfeiture amounts.¹³ We believe that the policy announced herein is consistent with these statutory considerations.

7. In the past, the Bureaus have consistently rejected arguments that the magnitude of forfeitures imposed against student-run NCE stations should be reduced relative to those issued to other types of licensees. In doing so we have declined to cancel or reduce forfeitures based on a station’s NCE status¹⁴ or because it was student-run.¹⁵ Rather, we have held that these licensees, like all others, are

⁹ See *Toccoa Falls College*, Forfeiture Order, 27 FCC Rcd 8365 (MB 2012); *Rollins College*, Notice of Apparent Liability for Forfeiture and Order, 27 FCC Rcd 8234 (EB 2012); *Trustees of Columbia University*, Memorandum Opinion and Order and Notice of Apparent Liability for Forfeiture, 27 FCC Rcd 5198 (MB 2012); *Colby-Sawyer College*, Forfeiture Order, 26 FCC Rcd 9302 (MB 2011); *Linfield College*, Forfeiture Order, 26 FCC Rcd 7949 (MB 2011).

¹⁰ See FCC File Nos. BALED-20110125ACE (KUSF-FM), BALED-20100129ACX (KTRU(FM)), BALED-20110505ACD (WDUQ(FM)), BALED-20101228AAS (WXEL(FM)); BALED-20121121ALF (WLHV(FM)).

¹¹ We note that Bethany College has received consent to sell WVBC(FM), Bethany, West Virginia, to Pittsburgh Public Media. See FCC File No. BALED-20121214AOQ. Bethany College was assessed a \$6,500 forfeiture by the Bureau last June. See *Bethany College*, Forfeiture Order, 27 FCC Rcd 7106 (MB 2012).

¹² 47 U.S.C. § 503(b)(2)(E).

¹³ 47 C.F.R. § 1.80(b)(8).

¹⁴ *Bible Broadcasting Network, Inc.*, 23 FCC Rcd 8743, 8745 (MB 2008) (forfeiture reduced because station was an FM translator, not because it was an NCE station). See also *Boulder Community Broadcast Association, Inc.*, Forfeiture Order, 23 FCC Rcd 8308 (EB 2008) (finding that licensee’s NCE status alone was an insufficient basis to reduce forfeiture amount); *Lebanon Educational Broadcasting Foundation*, Memorandum Opinion and Order, 21 FCC Rcd 1442, 1446 (EB 2006) (same).

¹⁵ *University of Montana Western*, 24 FCC Rcd 3127, 3130-31 (MB 2009) (student-run stations are not exempted from requirements of 47 C.F.R. 73.3527(e)(8)).

liable for the actions and omissions by the staff and management that they have chosen.¹⁶ Where the Bureaus have reduced forfeitures for student-run stations, they have done so for reasons other than the stations' NCE status or staffing by students.¹⁷ Similarly, when faced with "inability to pay" arguments raised by NCE station licensees, the Bureaus historically have looked to the financial resources of the educational institution¹⁸ and not those of the station itself.¹⁹ In this case, the base forfeiture amount for the subject violations in an NAL issued to the University would have been \$ 20,000.²⁰

B. Discussion

8. Compliance with the Act and the Rules is a fundamental obligation that is imposed on broadcasters in exchange for their opportunity, as public trustees, to use public spectrum to reach their audiences, and we hold licensees responsible for any violations by their stations.²¹ We do not depart from that principle, nor from the concept that each licensee is responsible for the actions of its station's staff.²² However, we believe that in the particular context of student-run NCE stations, where high student volunteer turnover and limited resources for training and oversight are endemic, allowing a forfeiture reduction for a first-time documentation violation of the type described below in exchange for a consent decree that includes a compliance plan will promote, rather than undermine, compliance with the Rules. The Bureau's discretion to so act in potential forfeiture cases is consistent with our statutory mandate to

¹⁶ See *Southern Adventist University*, 26 FCC Rcd at 11256 (high turnover among staff at a predominantly student-run NCE station does not excuse licensee's failure to comply with public file requirements).

¹⁷ For instance, the Bureau has imposed lower forfeiture amounts on secondary stations such as translators and Class D stations. See, e.g., *Centerville City Schools Board of Education*, 25 FCC Rcd 3855, 3857 (MB 2010) (forfeiture reduced because license was for a Class D secondary service, not because the station was operated by students).

¹⁸ In general, a licensee's gross revenues are the best indicator of its ability to pay a forfeiture. See, e.g., *PJB Communications of Virginia, Inc.*, Forfeiture Order, 7 FCC Rcd 2088, 2089 (1992); *John L. White*, Forfeiture Order, 27 FCC Rcd 4129, 4131 (MB 2012); *Peak Communications*, Letter, 15 FCC Rcd 16188, 16189-90 (MB 2010).

¹⁹ See, e.g., *University of South Carolina*, Forfeiture Order, 26 FCC Rcd 11,134, 11,135 (MB 2011) ("We have consistently held that information regarding the station's (as opposed to the licensee's) budget is an insufficient basis upon which to evaluate a licensee's ability to pay, as it fails to meet the standard of 'other reliable and objective documentation'", citing *Wayne State College*, Forfeiture Order, 24 FCC Rcd 2484, 2485-86 (MB 2009) (station's operating budget was insufficient basis on which to assess the licensee's inability to pay); *Manchester College*, Forfeiture Order, 25 FCC Rcd 3638, 3640 (MB 2010) (same).

²⁰ See 47 C.F. R. § 1.80(b)(5) (\$10,000 base forfeiture amount for Public File Rule violations and \$3,000 base forfeiture amount for each of four late-filed Ownership Reports), rounded down to \$20,000.

²¹ See *Character Qualifications in Broadcast Licensing*, Report, Order and Policy Statement, 102 FCC 2d 1179, 1190-91 (1986), modified, 1 FCC Rcd 421 (1986), 5 FCC Rcd 3252 (1990), 6 FCC Rcd 3448 (1991), 7 FCC Rcd 6564 (1992).

²² See, e.g., *Eleven Ten Broadcasting Corp.*, Decision, 32 FCC Rcd 706, 707-08 (1962), recon. denied, 33 FCC 92 (1962), *aff'd sub nom. Immaculate Conception Church v. FCC*, 320 F.2d 795 (D.C. Cir. 1963).

craft appropriate sanctions for violations “as justice may require”²³ under the very narrow circumstances described here.

9. All licensees, including NCE licensees, have an unconditional and ongoing responsibility to train and supervise their staffs, volunteer or otherwise, in the full range of our regulatory compliance requirements. However, we recognize that such training is a challenge at student-run stations due to their extremely limited budgets, high turnover rate of student volunteers and lack of full-time managers. We believe that encouraging these stations to adopt a compliance plan after the initial discovery of the type of documentation violation described below will be a more effective remedy for these stations than imposing a high forfeiture amount.²⁴ We believe a compliance plan is particularly useful in the context of a student-run station because it will ensure education and training on regulatory compliance issues, consistent with the instructional purpose of such stations, for students who have shown a particular interest in and commitment to the field of communications and may go on to careers in that field.

10. We emphasize that the policy that we adopt here is very narrow and will not affect our forfeiture policies for other types of violations by any licensees, commercial or noncommercial. The policy is narrowly tailored to address the particular subset of Rule violations that we have observed to commonly occur at student-run NCE stations. We caution the licensees of such stations that the policy only extends to first-time violations of the Rules described below, including repeated instances of such violations discovered at once, either in an inspection, discovered by the licensee and reported to the Commission, or uncovered in a petition or objection to an application. Subsequent or repeated violations after that first-time violation, or violations involving Rules that are beyond the scope of this policy, will be addressed in a manner consistent with past precedents. We also expressly caution other NCE and commercial licensees that may also use station volunteers or interns and may provide some educational or vocational training to them that this policy is strictly confined to student-run NCE broadcast stations, as defined herein, licensed to secondary schools, colleges and universities or entities under the control of these educational institutions.²⁵

11. Specifically, we will limit this policy to violations of rules that require the submission of reports and other materials or public notice of information where a student-run NCE station has failed to (a) file the required materials with the Commission, such as the Ownership Reporting Rule, (b) place the required materials in a file, such as in the station’s public inspection file pursuant to the Public File Rule, or (c) publish a notice in a local newspaper or broadcast as an announcement on the station pursuant to

²³ See 47 U.S.C. § 503(b)(2)(D); see also 47 C.F.R. § 1.80(b)(5).

²⁴ We note that the Bureau sometimes imposes a short-term license renewal in addition to a forfeiture in cases involving particularly extensive Rule violations. In appropriate cases, particularly those involving a repeated or continuing violation that extends over all of a license term, a consent decree negotiated pursuant to this Policy Statement may also include a short-term license renewal. See 47 U.S.C. § 309(k)(2); see also *Yearly Broadcasting, Inc.*, Memorandum Opinion and Order and Notice of Apparent Liability for Forfeiture, 27 FCC Rcd 5172 (MB 2012), and *University of Maryland, Eastern Shore*, Memorandum Opinion and Order and Notice of Apparent Liability, 27 FCC Rcd 5177 (MB 2012) (NAL issued and four-year renewal granted where licensee had no issues/programs lists for the entire license term).

²⁵ Unlike volunteers at other NCE stations, a student's tenure at a student-run station is typically for a fixed period defined by matriculation and eventual graduation. As such, the basic structure of student-run stations makes it difficult to preserve an "institutional memory" longer than the duration of a degree program at most. In addition, unlike other NCE stations in which the training of staff is but one element of station operation, education of staff is a core purpose of student-run stations.

Section 73.3580 of the Rules (47 C.F.R. § 73.3580).²⁶ We emphasize that substantive operational violations, *e.g.*, broadcast of indecent/obscene/profane material, commercial announcements, illegal contests, underwriting, news distortion and other programming-related violations, violations of the Commission's technical, public safety, tower/transmitter site construction and maintenance rules, etc., as well as recurring or subsequent violations of any kind, will continue to be handled under current procedures, with no reduction or relief for student-run stations, apart from those potentially available to all licensees under current procedures in appropriate circumstances.²⁷

12. In order to receive relief under this policy for student-run NCE stations, the following procedures will apply. If, in its processing of license renewal or other application pertaining to what may be a student-run NCE radio station, Bureau staff determines that an apparent first-time violation of a rule subject to this policy may have occurred, it will so advise the licensee, noting that fact and the right of the licensee to seek a consent decree along the lines discussed herein.²⁸ In response, the licensee of a student-run NCE station will have thirty days to notify the Bureau in writing if it elects to pursue a consent decree. If it so elects, it must demonstrate in its notification that its station is student-run, as defined herein, and that the violation in question qualifies for treatment in a consent decree under this policy. We will accept sworn declarations or unsworn declarations under penalty of perjury pursuant to Section 1.16 of the Rules²⁹ affirming that, as of the time of the violation in question, the station at which the violation occurred was licensed to an educational institution and was, in fact, operated as a "student-run" station, *i.e.*, that it was managed and programmed entirely by student volunteer staff and not by paid professional

²⁶ These violations do not include certain documentation violations which relate to the technical operation of a station or otherwise raise possible concerns of interference, public safety, or statutory compliance, such as: (a) violations of the Act (*see, e.g.*, 47 U.S.C. §§ 301, 307-10, 317-19); (b) notifications/filings to, or notifications/filings required by, other government agencies (*see, e.g.*, Section 73.1030 of the Rules, 47 C.F.R. §73.1030); (c) missing information required to be posted in a station log (*see* Sections 73.1800 – 1870 of the Rules, 47 C.F.R. §§ 73.1800-1870); or (d) missing information required to be posted at a particular location other than a file (*see, e.g.*, Section 73.1230 of the Rules, 47 C.F.R. § 73.1230). Moreover, misrepresentation or lack of candor by the licensee will not be eligible for treatment under our new policy. For instance, if a station failed to file a required Section 1.65 amendment to an application due to an oversight, that would be an appropriate circumstance for application of the new policy. *See* 47 C.F.R. §§1.65, 1.80 (\$3,000 base forfeiture amount for failure to file required information). However, if the amendment was not filed in an effort to conceal information from the Commission, or if the amendment was filed deliberately with false information or a deliberate omission of material information, we would address the matter as a misrepresentation or lack of candor. *See* 47 C.F.R. § 1.17. Also, this policy will not excuse a licensee in any fashion from providing information to the Commission as required by Sections 308(b) and 403 of the Act (47 U.S.C. §§ 308(b) and 403), or Sections 73.1015, 73.1225 and 73.1226 of the Rules (47 C.F.R. §§ 73.1015, 73.1225, and 73.1226).

²⁷ We will not apply the new policy to these types of violations, even if they arguably involved some type of missing information or arose out of administrative oversight. For instance, if a student-run station fails to disclose the material terms of a contest as required by Section 73.1216 of the Rules (47 C.F.R. §73.1216), this will be treated as a substantive violation outside of the scope of this policy..

²⁸ The Bureau's records and databases do not show whether or not any specific NCE station is a student-run station, nor do the Rules define this term. Accordingly, a licensee of a student-run station that is disclosing a Rule violation to the Commission may wish to indicate that the station is student-run when it makes the disclosure.

²⁹ 47 C.F.R. § 1.16.

staff other than the faculty advisor.³⁰ The licensee should also submit a copy of the station's operating budget for the period in which the violation occurred, which includes the specification of any staffing expenses. A licensee so electing must proceed promptly and in good faith to negotiate with the Bureau a compliance plan, which must provide for training its station staff on compliance with the Act, the Rules and the terms of the compliance plan on a regular basis (not less than annually for each station volunteer), ongoing compliance monitoring and assessment by a faculty member, school official or attorney or engineer who is familiar with the Act and the Rules as they apply to NCE stations, and an annual certification of compliance with the Act, the Rules and the compliance plan (or explanation of non-compliance combined with an explanation of remedial actions) by an official of the licensee educational institution. The licensee should also outline in its notification any other matters that it deems relevant to the development of an effective compliance plan. In determining the amount of the licensee's voluntary payment pursuant to the consent decree, the Commission will consider the totality of the circumstances, including the number, nature and circumstances of the violation, the licensee's history of prior violations, if any, and, because of the often limited financial resources that schools may make available to their student-run stations, those resources budgeted to the station, rather than the those of the licensee.

13. We note that many of the violations subject to this policy will be, as in this case, violations of the Public File Rule, which requires NCE stations to maintain a file for public inspection and update that file periodically, such as with the inclusion of quarterly lists of programs that have provided the station's most significant treatment of community issues during the prior quarter.³¹ Our action here is intended to improve compliance with, and enhance the education of station student staff regarding our Rules, including the Public File Rule. A public file violation is a serious matter and we will continue to emphatically reject arguments to the contrary.³² Nevertheless, we have the discretion under the Act and the Rules to take into account the important long-term benefits of a compliance plan in the context of the vital and unique educational mission of student-run stations, their reliance on inexperienced volunteers and the unique benefits these stations provide, both to their student staffs and their communities of license.³³ We are also taking into account the fragile environment in which student-run stations operate. As discussed above, as colleges and universities across the country are seeking ways to reduce expenditures and obtain operating funds to offset shrinking budgets, some have decided to sell their NCE stations. We are very concerned that the imposition of forfeitures in the amount otherwise called for by the Act, the Rules and pertinent precedent may accelerate this trend. We conclude that it is reasonable to take into the account the possibility of such outcomes – depriving listeners of important local voices and

³⁰ In a case involving multiple rule violations, some violations may qualify for a reduction in the total amount of the payment under this policy and some may not. We will apply the reduction only to those violations that meet the restrictions described in this Policy Statement.

³¹ See 47 C.F.R. § 73.3527(e)(8)(i).

³² We have consistently taken appropriate enforcement action for Public File Rule violations, and we will continue to apply current enforcement policy in cases not within the scope of this Policy Statement. See, e.g., *Forfeiture Policy Statement and Amendment of Section 1.80(b) of the Rules to Incorporate the Forfeiture Guidelines*, Report and Order, 12 FCC Rcd 17087, 17104-05 (1997); *Double O South Carolina*, Forfeiture Order, 27 FCC Rcd 8730 (MB 2012) (upholding a \$10,000 forfeiture for failing to properly maintain a station public inspection file and emphasizing the importance of maintaining a complete public file). However, we find that the unique circumstances presented by student-run NCE stations support the change in policy that we describe here.

³³ See, e.g., Note to 47 C.F.R. § 1.80(b)(8) (“the Commission and its staff retain the discretion to issue a higher or lower forfeiture than provided in the guidelines, to issue no forfeiture at all, or to apply alternative or additional sanctions as permitted by the statute”).

student volunteers of the opportunity to develop the skills necessary to enter the communications industry workforce – in shaping the manner in which we sanction student-run stations for their violations.

C. Conclusion

14. Student-run radio stations such as the University's Station are a unique subset of media outlets that provide opportunities for student volunteers to obtain training and real-world experience in radio programming, production, operations and management while they take part in the academic life of a school. For the reasons described above, we conclude that it is appropriate to tailor our enforcement policies toward student-run stations in a way that will promote compliance with the Act and the Rules while allowing these stations to remain viable in a challenging economic environment for schools. We believe that the limited change in policy described above and adopted herein will serve these purposes, as well as the greater public interest.

III. ORDER

15. The University has shown that the Station is a student-run NCE station licensed to an educational institution and that the violations at the Station are first-time documentation violations within the parameters of our new policy. Instead of issuing an NAL to the University, we have negotiated the attached Consent Decree, which provides for the University to carry out a compliance plan that meets the requirements of the new policy and to make a voluntary contribution to the United States Treasury in the amount of \$2,500, which, as we have noted, is substantially below the level indicated in our forfeiture guidelines for such violations but appropriate in light of the totality of circumstances presented.

16. After reviewing the terms of the Consent Decree, we find that the public interest will be served by its approval and by terminating all pending proceedings relating to the Bureau's consideration of potential violations of the Rules disclosed in the University's Renewal Application.

17. Based on the record before us, we conclude that nothing in that record creates a substantial or material question of fact whether the University possesses the basic qualifications to remain a Commission licensee and has satisfied the standards in Section 309(k)(1) of the Act for renewal of the Station's license.

18. ACCORDINGLY, IT IS ORDERED that, pursuant to Section 4(i) of the Communications Act of 1934, as amended,³⁴ and by the authority delegated by Sections 0.61 and 0.283 of the Rules,³⁵ the Policy Statement contained herein and the Consent Decree attached hereto ARE ADOPTED.

19. IT IS FURTHER ORDERED that the investigation by the Media Bureau of the matters noted above IS TERMINATED.

20. IT IS FURTHER ORDERED, that copies of this Policy Statement and Order shall be sent by Certified Mail Return Receipt Requested and by First Class Mail, to William Penn University, 201

³⁴ 47 U.S.C. § 4(i).

³⁵ 47 C.F.R. §§ 0.61, 0.283.

Trueblood Avenue, Oskaloosa, IA 52577, and to its counsel, David D. Oxenford, Esq., Wilkinson Barker Knauer, LLP, 2300 N Street, N.W., Suite 700, Washington, DC 20037.

FEDERAL COMMUNICATIONS COMMISSION

William T. Lake
Chief, Media Bureau