

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

In the Matter of)	EB Docket No. 03-152
)	
WILLIAM L. ZAWILA)	Facility ID No. 72672
)	
Permittee of FM Station KNKS, Coalinga, California)	
)	
AVENAL EDUCATIONAL SERVICES, INC.)	Facility ID No. 3365
)	
Permittee of FM Station KAAX, Avenal, California)	
)	
)	Facility ID No. 9993
CENTRAL VALLEY EDUCATIONAL SERVICES, INC.)	
)	
Permittee of FM Station KAJP, Firebaugh, California)	
)	
)	Facility ID No. 22030
H. L. CHARLES D/B/A FORD CITY BROADCASTING)	
)	
Permittee of FM Station KZPE, Ford City, California)	
)	
)	Facility ID No. 37725
LINDA WARE D/B/A LINDSAY BROADCASTING)	
)	
Licensee of FM Station KZPO, Lindsay, California)	
)	
)	File No. BR-19970804YJ
WESTERN PACIFIC BRAODCASTING, INC.)	Facility ID No. 71936
)	
)	
For Renewal of License for AM Station KKFO, Coalinga, California)	

To: Marlene H. Dortch, Secretary
Attn: Chief Administrative Law Judge Richard L. Sippel

ENFORCEMENT BUREAU'S MOTION FOR LEAVE TO FILE
A MOTION TO DELETE ISSUES

1. Pursuant to Section 1.229(a) of the Commission's rules, any party in a matter that is neither a comparative broadcast proceeding nor the subject of a program carriage complaint, may file a motion to modify (by enlarging, changing, or deleting) the issues designated for hearing within 15 days after the full text or a summary of the order designating the case for hearing has been published in the Federal Register.¹ Moreover, motions for modifications based on newly discovered facts may be filed within 15 days after such facts are discovered by the moving party.² After the expiration of the applicable 15-day time period, any party may seek to modify the issues where the motion "raises a question of probable decisional significance and such substantial public interest importance as to warrant consideration in spite of its untimely filing"³ or where other "good cause is shown for the delay in filing."⁴

2. On March 19, 2015, the Presiding Judge ordered Messrs. Zawila and White to submit evidence that establishes the owners, officers, and any other individuals who control the operations of Avenal Educational Service, Inc. (Avenal), which is the permittee of FM station KAAX, and of Central Valley Educational Services, Inc. (Central Valley), which is the permittee of FM station KYAF (formerly KAJP).⁵ Upon review of Messrs. Zawila's and White's responses to *Order*, FCC 15M-11, and upon review of additional Commission files, the Bureau discovered new facts and evidence that it believes raise questions of decisional significance to resolution of several Issues designated in the Order To Show Cause, Notice of Opportunity For

¹ See 47 C.F.R. § 1.229(a); see also 47 C.F.R. §§ 1.229(b)(1) and (b)(2).

² 47 C.F.R. § 1.229(b)(3)

³ 47 C.F.R. § 1.229(c).

⁴ 47 C.F.R. § 1.229(b)(3) and (c).

⁵ See *Order*, FCC 15M-11 (ALJ, rel. Mar. 19, 2015).

Hearing, and Hearing Designation Order (HDO).⁶ In particular, the Bureau only recently discovered facts that put into question the proper ownership and/or control of Avenal and Central Valley, and whether Avenal and Central Valley were qualified applicants at the time they filed their applications for Stations KAAX (FM) and KYAF((FM). As the Bureau has detailed in the Motion To Delete Issues, filed herewith as Exhibit A, these newly discovered facts raise questions of decisional significance to the resolution of Issues 113(a) – (e) of the HDO.⁷

3. The Bureau is respectful of the fact that, pursuant to Section 1.229(b)(3) of the Commission’s rules, motions for modifications of issues which are based on new facts or newly discovered facts must be filed within 15 days after such facts are discovered.⁸ The Bureau discovered many of the facts underlying its instant request after conducting an independent investigation into the evidence set forth in Mr. White’s response to *Order*, FCC 15M-11, which the Bureau received on May 4, 2015. The Bureau continued to investigate these issues until it filed its initial response to *Order*, FCC 15M-11, on May 12, 2015. Accordingly, the Bureau respectfully requests that the Presiding Judge consider May 12, 2015 to be the date from which the 15-day deadline pursuant to 47 C.F.R. § 1.229(b)(3) should be calculated.⁹

⁶ See *In re Zawila*, Order To Show Cause, Notice of Opportunity For Hearing, and Hearing Designation Order, 18 FCC Rcd 14938 (Jul. 16, 2003).

⁷ These Issues relate to whether Mr. Zawila misrepresented facts to and/or lacked candor with the Commission on behalf of Avenal and of Central Valley concerning the construction and/or operation of those Stations and whether Mr. Zawila, individually and/or as an officer of Avenal and Central Valley willfully or repeatedly violated Sections 73.1690(b)(2) of the Rules, and whether Avenal and Central Valley willfully or repeatedly violated Sections 73.1125, 73.3526 and/or 17.57 of the Rules in relation to Stations KAAX (FM) and KYAF (FM). See HDO at ¶ 113(a)-(e).

⁸ See 47 C.F.R. § 1.229(b)(3).

⁹ In the alternative, should the Presiding Judge find this motion untimely, the Bureau requests that it be granted leave to file its Motion to Delete Issues because the Bureau’s Motion “raises a question of probable decisional significance and such substantial public interest as to warrant consideration in spite of its untimely filing.” 47 C.F.R. § 1.229(c). As the Presiding Judge has noted, the ownership issues are of decisional significance and “this proceeding cannot proceed until questions raised by Mr. Zawila and Mr. White regarding ownership and control over Avenal and Central Valley are resolved.” *Order*, FCC 15M-11, at 2.

4. Deletion of the portion of Issues 113(a) – (e) of the HDO that relate to Avenal and Central Valley and to Stations KAAX (FM) and KYAF (FM) will serve the public interest by streamlining the Issues in the HDO, which in turn will allow the parties to more expeditiously resolve the remaining Issues in the HDO. Accordingly, the Bureau requests that the Presiding Judge grant the Bureau leave to file the attached Motion to Delete Issues.

Respectfully submitted,

Travis LeBlanc
Chief, Enforcement Bureau



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May 22, 2015

EXHIBIT A

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

In the Matter of)	EB Docket No. 03-152
)	
WILLIAM L. ZAWILA)	Facility ID No. 72672
)	
Permittee of FM Station KNGS, Coalinga, California)	
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AVENAL EDUCATIONAL SERVICES, INC.)	Facility ID No. 3365
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Permittee of FM Station KAAX, Avenal, California)	
)	
CENTRAL VALLEY EDUCATIONAL SERVICES, INC.)	Facility ID No. 9993
)	
Permittee of FM Station KAJP, Firebaugh, California)	
)	
H. L. CHARLES D/B/A FORD CITY BROADCASTING)	Facility ID No. 22030
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Permittee of FM Station KZPE, Ford City, California)	
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LINDA WARE D/B/A LINDSAY BROADCASTING)	Facility ID No. 37725
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Licensee of FM Station KZPO, Lindsay, California)	
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WESTERN PACIFIC BRAODCASTING, INC.)	File No. BR-19970804YJ Facility ID No. 71936
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For Renewal of License for AM Station KKFO, Coalinga, California)	

To: Marlene H. Dortch, Secretary
Attn: Chief Administrative Law Judge Richard L. Sippel

ENFORCEMENT BUREAU'S MOTION TO DELETE ISSUES

1. Pursuant to Section 1.229(a) of the Commission's rules, any party in a matter that is neither a comparative broadcast proceeding nor the subject of a program carriage complaint, may file a motion to modify (by enlarging, changing, or deleting) the issues designated for hearing within 15 days after the full text or a summary of the order designating the case for hearing has been published in the Federal Register.¹ Moreover, motions for modifications based on newly discovered facts may be filed within 15 days after such facts are discovered by the moving party.² After the expiration of the applicable 15-day time period, any party may seek to modify the issues where the motion "raises a question of probable decisional significance and such substantial public interest importance as to warrant consideration in spite of its untimely filing"³ or where other "good cause is shown for the delay in filing."⁴

2. On March 19, 2015, the Presiding Judge ordered Messrs. Zawila and White to submit evidence that establishes the owners, officers, and any other individuals who control the operations of Avenal Educational Service, Inc. (Avenal), which is the permittee of FM station KAAX, and of Central Valley Educational Services, Inc. (Central Valley), which is the permittee of FM station KYAF (formerly KAJP).⁵ Upon review of Messrs. Zawila's and White's responses to *Order*, FCC 15M-11,⁶ and upon review of additional Commission files, the Bureau discovered new facts and evidence that it believes raise questions of decisional significance to

¹ See 47 C.F.R. § 1.229(a); see also 47 C.F.R. §§ 1.229(b)(1) and (b)(2).

² 47 C.F.R. § 1.229(b)(3).

³ 47 C.F.R. § 1.229(c).

⁴ 47 C.F.R. § 1.229(b)(3).

⁵ See *Order*, FCC 15M-11 (ALJ, rel. Mar. 19, 2015).

⁶ See [Zawila's] Status Report Regarding Verne J. White and Ownership and Control of KAAX and KYAF (Formerly KAJP), filed Apr. 7, 2015 (Zawila's Status Report); [White's] Evidence Regarding Ownership, filed May 4, 2015 (White's Status Report).

resolution of several Issues designated in the Order To Show Cause, Notice of Opportunity For Hearing, and Hearing Designation Order (HDO).⁷ For the reasons discussed in detail below, the Chief, Enforcement Bureau, respectfully requests consideration of the instant motion to delete those portions of Issues 113(a) – (e) of the HDO that relate to Avenal and Central Valley and to Stations KAAX (FM) and KYAF (FM).⁸

3. *Ownership Issue.* First, the Bureau discovered for the first time that the question of who owns and/or controls Avenal and Central Valley remains unsettled. Indeed, as the Bureau noted in its Comments Pursuant To *Orders*, FCC 15M-11 and FCC 15M-17, filed contemporaneously with the instant pleading, neither Mr. Zawila’s nor Mr. White’s pleading affirmatively establishes the ownership and/or control of either Avenal or Central Valley.⁹ The Commission’s records likewise fail to provide any greater illumination on the question.

4. As the Presiding Judge has correctly noted, “questions raised by Mr. Zawila and Mr. White regarding ownership and control over Avenal and Central Valley” are central to the Issues designated in this proceeding.¹⁰ The Bureau agrees with the Presiding Judge and believes that the question of who had the proper authority to make representations on behalf of Avenal and Central Valley concerning the construction and/or operation of Stations KAAX (FM) and KYAF (FM) and who in fact was responsible for ensuring that Avenal and Central Valley complied with Commission’s rules concerning the operation of these Stations is of decisional

⁷ See *In re Zawila*, Order To Show Cause, Notice of Opportunity For Hearing, and Hearing Designation Order, 18 FCC Rcd 14938 (Jul. 16, 2003) (HDO). See also Enforcement Bureau’s Motion for Leave to File a Motion to Delete Issues, filed contemporaneously herewith, on May 22, 2015, at ¶ 3 and n. 9.

⁸ These Issues relate to whether Mr. Zawila misrepresented facts to and/or lacked candor with the Commission on behalf of Avenal and of Central Valley concerning the construction and/or operation of those Stations and whether Mr. Zawila, individually and/or as an officer of Avenal and Central Valley, willfully or repeatedly violated Sections 73.1690(b)(2) of the Rules, and whether Avenal and Central Valley willfully or repeatedly violated Sections 73.1125, 73.3526 and/or 17.57 of the Rules in relation to Stations KAAX (FM) and KYAF (FM). See HDO at ¶ 113(a)-(e).

⁹ See Enforcement Bureau’s Comments Pursuant To *Orders*, FCC 15M-11 and FCC 15M-17, filed May 22, 2015.

¹⁰ *Order*, FCC 15M-11 (ALJ, rel. Mar. 19, 2015) at 2.

significance to Issues 113 (a) – (e) designated in the HDO. If, for example, someone other than Mr. Zawila controlled Avenal and Central Valley, and/or was responsible for operating Stations KAAX (FM) and KYAF (FM), then there is a question as to whether Mr. Zawila was properly named in these Issues and whether additional individuals or entities should have been implicated. However, because the Commission’s records fail to offer any illumination on Avenal and Central Valley’s corporate ownership and control, and the determination may rest on issues of California law concerning allegedly fraudulent corporate filings,¹¹ the Bureau respectfully suggests that the Presiding Judge delete those portions of Issues 113(a)-(e) of the HDO concerning Avenal and Central Valley and the two disputed stations. This would allow Messrs. Zawila and White to resolve their corporate disputes outside the context of this proceeding while the parties proceed with the remaining Issues designated in the HDO that do not relate to Avenal, Central Valley, or Stations KAAX (FM) and KYAF (FM) without further delay.

5. *Applicant Eligibility Issue.* Second, during its investigation of the ownership question discussed above, the Bureau discovered that neither Avenal nor Central Valley may have been qualified to hold the permits for Stations KAAX (FM) or KYAF (FM) at the time they submitted their respective applications. As the Bureau explained in earlier filings – and as is substantiated by the Commission’s Consolidated Database System (CDBS) – Stations KAAX (FM) and KYAF (FM) are non-commercial educational (NCE) stations.¹² As such, these Stations are governed by Section 73.503 of the Rules,¹³ which in pertinent part sets forth that “a noncommercial educational FM broadcast station will be licensed only to a nonprofit educational organization and upon showing that the station will be used for the advancement of an

¹¹ See, e.g., Zawila’s Status Report at 4-6.

¹² See, e.g., Enforcement Bureau’s Status Report, filed Nov. 7, 2014, at 2 (EB’s Status Report).

¹³ See 47 C.F.R. § 73.503.

educational program.”¹⁴ It is well-established that an applicant for an NCE FM station, such as those governed by Section 73.503 “must certify its eligibility to own and operate such station *at the time it files its application.*”¹⁵ Indeed, such applicants must “be incorporated or otherwise organized in a form recognized under state law *at the time of filing*” in order to qualify for the NCE FM license.¹⁶ Mr. Zawila and Mr. White both assert that Avenal and Central Valley are California corporations.¹⁷ As such, for either of these entities to have qualified for NCE FM licenses, they must have been organized in a form recognized under California law at the time they filed their respective applications for Stations KAAX (FM) and KYAF (FM). The record strongly suggests they were not.

6. Neither Mr. Zawila nor Mr. White dispute that Avenal filed its application for NCE Station KAAX (FM) in 1989.¹⁸ However, it appears that Avenal was not incorporated until 10 years later, in 1999. As part of Mr. Zawila’s submission, he included Avenal’s Articles of Incorporation, which are dated January 22, 1999.¹⁹ Under California law, a corporation’s existence begins when its articles of incorporation are filed with the Office of the Secretary of

¹⁴ *Id.* at § 73.503(a).

¹⁵ *Hammock Environmental and Educational Community Svcs.*, 25 FCC Rcd 12804, 12807 (Sept. 10, 2010) (emphasis added) (citation omitted).

¹⁶ *Applications For Review of Decisions Regarding Six Applications For New Low Power FM Stations*, Memorandum Opinion and Order, 28 FCC Rcd 13390, 13394 (Aug. 23, 2013); *see Hope Radio of Rolla, Inc.*, Memorandum Opinion and Order, 28 FCC Rcd 7754, 7754 (May 14, 2013) (recognizing that to be eligible to hold an authorization for an NCE service, the applicant “must be a public agency or non-profit private foundation, corporation, or association that is recognized by the laws of the state in which it proposes to operate at the time it submits its application”); *WTL Communications, Inc.*, Memorandum Opinion and Order, 23 FCC Rcd 2475, 2478 (Feb. 8, 2008) (dismissing application for NCE station because the applicant was not incorporated as of the date on which it filed its application); *Sonido Internacional Cristiano, Inc.*, Memorandum Opinion and Order, 23 FCC Rcd 2444, 2448-49 (Feb. 8, 2008) (dismissing application for NCE station because the applicant was not incorporated as of the date on which it filed the application).

¹⁷ *See, e.g.*, Zawila’s Status Report at Exhibit 4 at 3-4; White’s Status Report at Declaration of Verne J. White at 1-2 and Attachments C and G, thereto.

¹⁸ *See, e.g.*, Zawila’s Status Report at Exhibit 1, ¶ 2; White’s Status Report at Declaration of Verne J. White at 2.

¹⁹ *See* Zawila’s Status Report at Exhibit A to Exhibit 4, thereto, entitled “Articles of Incorporation of Avenal Educational Services, Inc.”

State.²⁰ Indeed, a copy of the articles of incorporation, duly certified by the Office of the California Secretary of State, is usually conclusive evidence of the formation of the corporation and *prima facie* evidence of its corporate existence.²¹ Therefore, Avenal would not have been recognized as organized under California law until January 22, 1999, at the earliest. Indeed, Mr. White admits that Avenal was not incorporated until March 5, 1999.²² If Avenal was not incorporated or otherwise organized in a form recognized under California law at the time it filed its application for NCE Station KAAX (FM) and thus was not a qualified applicant under Section 73.503(a) of the Commission's rules, then Avenal should never have been granted the authorization for KAAX (FM) designated in the HDO. As a result, the Issues designated in the HDO relating to Avenal's responsibilities for the operation of this Station would be moot.

7. The same holds true for NCE Station KYAF (FM). Both Mr. Zawila and Mr. White assert that Central Valley filed its application for NCE Station KYAF (FM) on October 17, 1998.²³ The Commission's records confirm that Central Valley's application was received by the Commission on this date.²⁴ However, here again, the record reflects that Central Valley was not recognized as a California corporation until many years later. Specifically, Mr. Zawila's submission includes Central Valley's Articles of Incorporation which are dated January 26, 2001.²⁵ Moreover, Mr. White confirms his understanding that Central Valley was incorporated in California on January 29, 2001.²⁶ Thus, as with Avenal discussed above, if Central Valley

²⁰ See Cal. Corp. Code §§ 200 (a), (c); 7120.

²¹ See Cal. Corp. Code § 209.

²² See White's Status Report at Declaration of Verne J. White at 2 and Attachment G, thereto.

²³ See Zawila's Status Report at Exhibit 1, ¶ 2; White's Status Report at Declaration of Verne J. White at 1.

²⁴ See original application for NCE station KYAF, dated October 13, 1998, submitted by Central Valley, attached hereto as Exhibit 1.

²⁵ See Zawila's Status Report at Exhibit A to Exhibit 4, thereto, entitled "Articles of Incorporation of Central Valley Educational Services, Inc."

²⁶ See White's Status Report at Declaration of Verne J. White at 1 and Attachment C, thereto.

was not incorporated or otherwise organized in a form recognized under California law at the time it filed its application for NCE Station KYAF (FM), and was not a qualified applicant under Section 73.503(a) of the Rules, Central Valley should never have been granted the authorization for KYAF (FM) designated in the HDO. The Issues designated in the HDO relating to Central Valley's responsibilities for the operation of this Station likewise would be moot.

8. As the Presiding Judge correctly noted in his recent *Order*, FCC 15M-17, the question of whether Avenal and Central Valley were qualified applicants under Section 73.503(a) of the Rules at the time they filed their applications for Stations KAAX (FM) and KYAF (FM), respectively, was not designated to the Presiding Judge in the HDO.²⁷ Because such questions are usually evaluated by the licensing bureau,²⁸ the Bureau respectfully requests that the Presiding Judge delete those portions of Issues 113(a)-(e) of the HDO concerning Avenal and Central Valley and the two disputed stations so that the Media Bureau can resolve the question of whether Avenal and Central Valley were eligible applicants. In the meantime, the parties can proceed with the remaining Issues designated in the HDO that do not relate to Avenal, Central Valley, or Stations KAAX (FM) and KYAF (FM).

Conclusion

9. For the foregoing two independent reasons, one related to ownership and one to applicant qualifications, the Bureau respectfully requests that the Presiding Judge enter an Order deleting those portions of Issues 113(a) – (e) of the HDO that relate to Avenal and Central Valley and to Stations KAAX (FM) and KYAF (FM).

²⁷ See *Order*, FCC 15M-17 (ALJ, rel. May 13, 2015), at 3. See also HDO at ¶¶ 113-115.

²⁸ See, e.g., *Applications For Review of Decisions Regarding Six Applications For New Low Power FM Stations*, Memorandum Opinion and Order, 28 FCC Rcd at 13395 (noting that the Media Bureau properly considered an applicant's organizational standing at the time it filed its application for an NCE permit in determining an applicant's eligibility to hold such a permit).

Respectfully submitted,

Travis LeBlanc
Chief, Enforcement Bureau



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May 22, 2015

EXHIBIT 1

William L. Zawila
ATTORNEY AT LAW

OCT 17 1 20 AM '88

AUDIO SERVICES
DIVISION

12550 BROOKHURST STREET
GARDEN GROVE, CALIFORNIA 92640
(714) 636-5040

October 13, 1988

RECEIVED BY

OCT 17 1988

MAIL BRANCH

Secretary
Federal Communications Commission
1919 "M" Street, N.W.
Washington, D.C. 20554

Re: Enclosed Application for a New FM Station at Firebaugh, CA

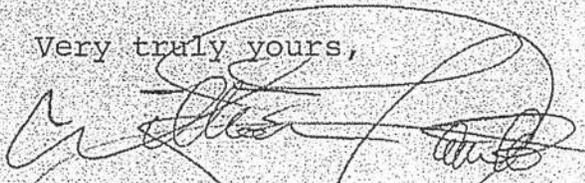
Secretary:

Enclosed for filing with the Commission is an original and two copies of an application for a new educational FM station at Firebaugh, California.

Please contact this office if you need further information in this matter.

Very truly yours,

WLZ/ff
encls (3)



WILLIAM L. ZAWILA
Attorney For Central Valley
Educational Services, Inc.

RECEIVED

OCT 17 1988

FIVE EXAMINERS

103.1MHZ
BPED -881017MD NEW
FIREBAUGH CA
CENTRAL VALLEY EDUC SERVICES, INC.

APPLICATION FOR CONSTRUCTION PERMIT FOR
NONCOMMERCIAL EDUCATIONAL BROADCAST STATION
(Carefully read instructions before filling out Form—RETURN ONLY FORM TO FCC)

For Commission Use Only
File No. 881017MD

Section I

ORIGINAL

General Information

Code: 31
PN: 10/26

1. Name of Applicant

Central Valley Educational
Services, Inc.

Street Address

12550 Brookhurst Street,
Suite A

City State ZIP Code Telephone No.
Garden Grove CA 92640- (Include Area Code)
None.

Send notices and communications to the following named person at the address below:

Name

Street Address

WILLIAM L. ZAWILA
Attorney at Law

12550 Brookhurst Street,
Suite A

City State ZIP Code Telephone No.
Garden Grove CA 92640- (Include Area Code)

2. This application is for: AM FM TV

(714) 636-5040

(a) Channel No. or Frequency: 276-A 103.1

(b) Community of license:

City State

Firminburg CA

(c) Check one of the following boxes:

- Application for new station
- Major Change in Existing station; call sign: _____
- Minor Change in Existing station; call sign: _____
- Modification of Construction Permit; File No. of CP: _____
- Amendment to Pending Application; Reference Number (ARN): _____

NOTE: It is not necessary to use this form to amend a previously filed application. Should you do so, however, please submit only Section I and those other portions of the form that contain the amended information.

3. Is this application mutually exclusive with a renewal application?

YES NO

If Yes, State:

Call letters:

Community of license:

City State

_____-_____-_____

Name of Applicant

Central Valley Educational Services, Inc.

1. (a) Applicant is: (Check one box below)

- a general partnership operating on a nonprofit basis a nonprofit corporation
- a limited partnership operating on a nonprofit basis Other (specify)
- a governmental or public educational agency or institution

If the applicant is an unincorporated association or a legal entity other than a partnership, nonprofit corporation, or a governmental or public educational agency or institution, describe in Exhibit No. ____ the nature of the applicant.

- (b) Is there any provision contained in any by-laws, articles of incorporation, partnership agreement, charter, statute or any other document which would restrict the applicant in advancing an educational program or complying with any Commission rule, policy or provision of the Communications Act of 1934, as amended. YES NO

If Yes, provide particulars as Exhibit No. ____ .

- (c) Does the applicant certify that copies of all pertinent documents set out in (b) are in the public inspection file? YES NO

Describe in Exhibit No. A how the proposed station will be used for the advancement of an educational program. This does not apply if applicant is applying for change in facilities.

Citizenship And Other Statutory Requirements

2. (a) Is the applicant in compliance with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and Foreign governments? YES NO

- (b) Will any funds, credits, etc., for the construction, purchase or operation of the station be provided by aliens, foreign entities, domestic entities controlled by aliens, or their agents? YES NO

If yes, provide particulars as Exhibit No. ____ .

3. (a) Has an adverse finding been made, adverse final action taken or consent decree approved by any court or administrative body as to the applicant or any party to the application in any civil or criminal proceeding brought under the provisions of any law related to the following subjects:
Any felony, antitrust, unfair competition, fraud, unfair labor practices or discrimination? YES NO

- (b) Is there now pending in any court or administrative body any proceeding involving any of the matters referred to in (a)? YES NO

If the answer to (a) or (b) above is Yes, attach as Exhibit No. ____ , a full disclosure concerning the persons and matters involved, identifying the court or administrative body and the proceeding (by dates and file numbers), stating the facts upon which the proceeding was based or the nature of the offense committed, and disposition or current status of the matter.

5 Has the applicant or any party to this application had any interest in:

- (a) a broadcast application which has been dismissed with prejudice by the Commission? YES NO
- (b) a broadcast application which has been denied by the Commission? YES NO
- (c) a broadcast station, the license of which has been revoked? YES NO
- (d) a broadcast application in any Commission proceeding which left unresolved character issues against that applicant? YES NO
- (e) If the answer to any of the questions above is Yes, attach Exhibit No. _____, stating the following information:

- (1) Name of party having such interest;
- (2) Nature of interest or connection, giving dates;
- (3) Call letters of stations or file number of application, or docket number;
- (4) Location.

Ownership and Control

6. Are there any documents, instruments, contracts, or understandings relating to ownership or future ownership rights (including, but not limited to, non-voting stock interests, beneficial stock ownership interest) or control? YES NO

If Yes, provide particulars as Exhibit No. _____.

7. Do documents, instruments, agreements or understandings for the pledge of stock of a corporate applicant, as security for loans or contractual performance, provide that (a) voting rights will remain with the applicant, even in the event of default on the obligation; (b) in the event of default, there will be either a private or public sale of the stock; and (c) prior to the exercise of stockholder rights by the purchaser at such sale, the prior consent of the Commission [pursuant to 47 U.S.C. 310(d)] will be obtained? YES NO

If No, attach as Exhibit No. _____, a full explanation.

Note: If this application is for a change in an operating facility, **DO NOT** fill out this section.

1. Is this application contingent upon receipt of a grant from the National Telecommunications and Information Administration? YES NO
2. Is this application contingent upon receipt of a grant from a charitable organization, the approval of the budget of a school or university, or an appropriation from a state, county, municipality or other political subdivision? YES NO

NOTE: If either 1 or 2 is answered "Yes", your application cannot be granted until all of the necessary funds are committed or appropriated. In the case of grants from the National Telecommunications and Information Administration no further action on your part is required. If you rely on funds from a source specified in Question 2, you must advise the F.C.C. when the funds are committed or appropriated. This should be accomplished by letter amendment to your application, in triplicate, signed in the same manner as the original application, and clearly identifying the application to be amended.

3. Except as indicated in Questions Numbered 1 and 2 above, the applicant certifies that:
- (a) It has a reasonable assurance of present commitments from each donor, from each party agreeing to furnish capital, from each bank, financial institution or others agreeing to lend funds, and from each equipment supplier agreeing to extend credit: YES NO
- (b) It can and will meet all contractual requirements as to collateral, guarantees, and capital investments or donations: YES NO
- (c) It has determined that a reasonable assurance exists that all such sources (excluding banks, financial institutions, and equipment manufacturers) have sufficient net liquid assets to meet these commitments. YES NO
4. The applicant certifies, except as noted above, that sufficient net liquid assets are on hand or available from committed sources to construct and operate the requested facilities for three months without additional funds. YES NO

Section IV

Program Service Statement

For AM, FM and TV Applications

Attach as Exhibit No. "A", the applicant's purpose and objective in establishing the proposed station and a statement of proposed program policies. If applicant already has such information on file, indicate file number and detail changes, if any.

Name of Applicant Central Valley Educational Services, Inc.

1 Purpose of authorization applied for:

Construct a new station

Install Auxiliary system

Change: Effective radiated power

Frequency

Antenna height above average terrain

Transmitter location

Studio location outside community of license

Other (Summarize briefly the nature of the changes proposed.)

2. Community of license:

State

California

City or Town

Firebaugh

3. Facilities requested:

Frequency

Channel No.

Class (Check one below)

103.1

MHz

276-A

A

B

B1

C

C1

C2

D

4. Geographic coordinates of antenna (to nearest second)

North Latitude

36° 47' 30"

West Longitude

120° 30' 00"

5. Effective radiated power:

Polarization

Horizontal Plane

Maximum (Beam tilt only)

Horizontal

3.0

kW

NOT USED

kW

Vertical

3.0

kW

NOT USED

kW

6. Height in meters of antenna radiation center:

Above
Average terrain (HAAT)

Above
Mean Sea Level

Above
Ground

Horizontal

100

meters

167.6

meters

103.6

meters

Vertical

100

meters

167.6

meters

103.6

meters

7. Is a directional antenna being proposed?

YES NO

If Yes, attach as Exhibit No. _____ an engineering statement with all data specified in Section 73.316(d) of the Commission's Rules.

15. Tabulation of Terrain Data. (Calculated in accordance with the procedure prescribed in Section 73.313 of the Commission's Rules utilizing 7.5 minute topographic maps, if available.)

Radial bearing (degrees true)	Height of antenna, radiation center above average elevation of radial (3-16 kilometers) Meters	Predicted Distance	
		To the 1 mV/m contour 60 dBu Kilometers	70 Dbu KM
0°	117.3	26.2	14.8
45°	113.7	25.8	14.6
90°	112.8	25.7	14.6
135°	107.0	25.1	14.2
180°	81.3	22.0	12.3
225°	71.3	20.6	11.4
270°	88.4	22.9	12.9
315°	108.2	25.2	14.3

Allocation Studies

(See Subpart C of Part 73 of the Commission's Rules and Regulations)

- 16 Is the proposed antenna location within 320 kilometers (199 miles) of the common border between the United States and Mexico? Yes No
 If Yes, attach as Exhibit No. _____ a showing of compliance with all provisions of the Agreement between the United States of America and the United Mexican States concerning Frequency Modulation Broadcasting in the 88 to 108 MHz band.
- 17 With regard to stations within 320 kilometers (199 miles) of the common border between the United States and Mexico, attach as Exhibit No. B-3 information required in 1/
- 18 If the proposed operation is for a channel in the range from channel 201 through 220 (88.1 through 91.9 MHz), then with regard to stations more than 320 kilometers (199 miles) from the common border between the United States and Mexico or if this proposed operation is for a class D station in the range from Channel 221 through 300 (92.1 through 107.9 MHz), attach as Exhibit No. _____ a complete allocation study to establish the lack of prohibited overlap of contours involving these stations. The allocation study should include the following:

DOES NOT APPLY

- (a) The normally protected interference-free and the interfering contours for the proposed operation along all azimuths.
- (b) Complete normally protected interference-free contours of all other proposals and existing stations to which objectionable interference would be caused.
- (c) Interfering contours over pertinent arcs of all other proposals and existing stations from which objectionable interference would be received.
- (d) Normally protected and interfering contours over pertinent arcs, of all other proposals and existing stations, which require study to show the absence of objectionable interference.
- (e) Plot of the transmitter location of each station or proposal requiring investigation, with identifying call letters, file numbers and operating or proposed facilities.
- (f) When necessary to show more detail, an additional allocation study will be attached utilizing a map with a larger scale to clearly show interference or absence thereof.
- (g) A scale of miles and properly labeled longitude and latitude lines, shown across the entire (Exhibit(s)). Sufficient lines should be shown so that the location of the sites may be verified.
- (h) The name of the map(s) used in the exhibit(s).

1/ A showing that the proposed operation meets the minimum distance separation requirements. If any separations are proposed that are less than the applicable minimum separation requirements plus 15 kilometers, include these stations. Also include existing stations, proposed stations, and cities which appear in the Table of Assignments; the location and geographic coordinates of each antenna, proposed antenna or reference point, as appropriate; and distance to each from proposed antenna location.

Name of Applicant: Central Valley Educational Services, Inc. Call Sign: Station Location: Firebaugh, California

Purpose of Application (Put "X" in appropriate box)

Facilities Requested: FM CHANNEL 276-A, 103.1 MHZ
3.0 KW ERP, + 100 METERS HAAT
SINGLE BAY CIRCULARLY POLARIZED FM ANTENNA
SIDE MOUNTED ON PROPOSED STEEL TOWER

- New antenna construction
- Alteration of existing antenna structure
- Change in location

1. Location of Antenna:
State: CALIFORNIA County: FRESNO City or Town: FIREBUAGH

Exact antenna location (street address). If outside city limits, give name of nearest town and distance and direction of antenna from town.
INTERSECTION OF ASHLAN AND DOUGLAS AVENUES,
9.6 KM (6 MILES) SOUTHWEST OF FIREBAUGH, CA.

Geographical coordinates (to nearest second). For directional antenna give coordinates of center of array. For single vertical radiator give tower location.

North Latitude: 36° 47' 30" West Longitude: 120° 30' 00"

2. Is the proposed site the same transmitter-antenna site of other stations authorized by the Commission or specified in another application pending before the Commission? YES NO

If Yes, give call sign:

3. Has the FAA been notified of proposed construction? YES NO

If Yes, give date and office where notice was filed.
Oct. 13, 1988, LOS ANGELES AREA REGIONAL OFFICE

4. List all landing areas within 5 miles of antenna site. Give distance and direction to the nearest boundary of each landing area from the antenna site.

Landing Area	Distance	Direction
(a) NONE		
(b)		
(c)		

5. Attach as Exhibit No. E-5 a description of the antenna system, including whether tower(s) are self-supporting or guyed. If a directional antenna, give spacing and orientation of towers.

Tower		#1	#2	#3	#4	#5	#6
Overall height above ground (Include obstruction lighting)	meters	107 M					
	feet	351'					
Overall height above mean sea level (Include obstruction lighting)	meters	171 M					
	feet	561'					

Section VI

EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

1. Does the applicant propose to employ five or more full time employees?

Yes No

If Yes, the applicant must include an EEO program called for in the separate Model EEO Program (FCC 396-A).

Section VII

CERTIFICATIONS

1. Has or will the applicant comply with the public notice requirement of Section 73.3580 of the Commission's Rules?

Yes No

2. Has the applicant reasonable assurance, in good faith, that the site or structure proposed in Section V of this form, as the location of its transmitting antenna, will be available to the applicant for the applicant's intended purpose?

Yes No
Exhibit No.

[Empty box for Exhibit No.]

If No, attach as an Exhibit, a full explanation.

3. If reasonable assurance is not based on applicant's ownership of the proposed site or structure, applicant certifies that it has obtained such reasonable assurance by contacting the owner or person possessing control of the site or structure.

George Sullivan
Name of Person Contacted

(714) 669-1963
Telephone No. (Include area code)

Person contacted: (check one box below)

Owner Owner's Agent Other (specify)

Linda Ross
Applicant's Signature

October 14, 1988
Date

Linda Ross, President
Central Valley Educational
Services, Inc.

The APPLICANT hereby waives any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations, and that all exhibits are a material part hereof and incorporated herein.

1 Does the applicant propose to employ five or more fulltime employees? YES NO

If the answer is Yes, the applicant must include an EEO program called for in the separate 5 Point Model EEO Program [FCC Form 396 (A)].

Section VII

Certification

1. Has or will the applicant comply with the public notice requirement of Section 73.3580 of the Commission's Rules? YES NO

The APPLICANT hereby waives any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations, and that all exhibits are a material part hereof and are incorporated herein.

The APPLICANT represents that this application is not filed for the purpose of impeding, obstructing, or delaying determination on any other application with which it may be in conflict.

In accordance with Section 1.65 of the Commission's Rules, the APPLICANT has a continuing obligation to advise the Commission, through amendments, of any substantial and significant changes in information furnished.

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT. U.S. CODE, TITLE 18, Section 1001.

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith

Signed and dated this 14th day of October, 1988. Central Valley Educational Services, Inc. Name of Applicant

Linda Ross Signature Linda Ross President/Secretary

Title

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to determine if the benefit requested is consistent with the public interest. The staff, consisting variously of attorneys, accountants, engineers, and application examiners, will use the information to determine whether the application should be granted, denied, dismissed, or designated for hearing. If all the information requested is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to obtain the requested Permit.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

EXHIBIT A

The applicant's purpose and objective in establishing the proposed FM station at Firebaugh, California, is to build and operate an FM station that will be used to train and educate people interested in getting into the communications field who are unable to enter broadcasting elsewhere. The applicant will make such training and education available to females, minorities, and disadvantaged people who desire to get into the communications field but who do not have the opportunity to do so. The applicant also plans to provide programming that will be beneficial to the Firebaugh, California, area including programming of an educational nature.

The applicant's programming policies will conform to all Commission rules and requirements. Furthermore, the applicant will provide programming that will be responsive to the needs of the Firebaugh, California, area, and will include public affairs, community issues discussion, and news. The applicant will also provide programming that will be responsive to the needs of females and minorities in the local area.

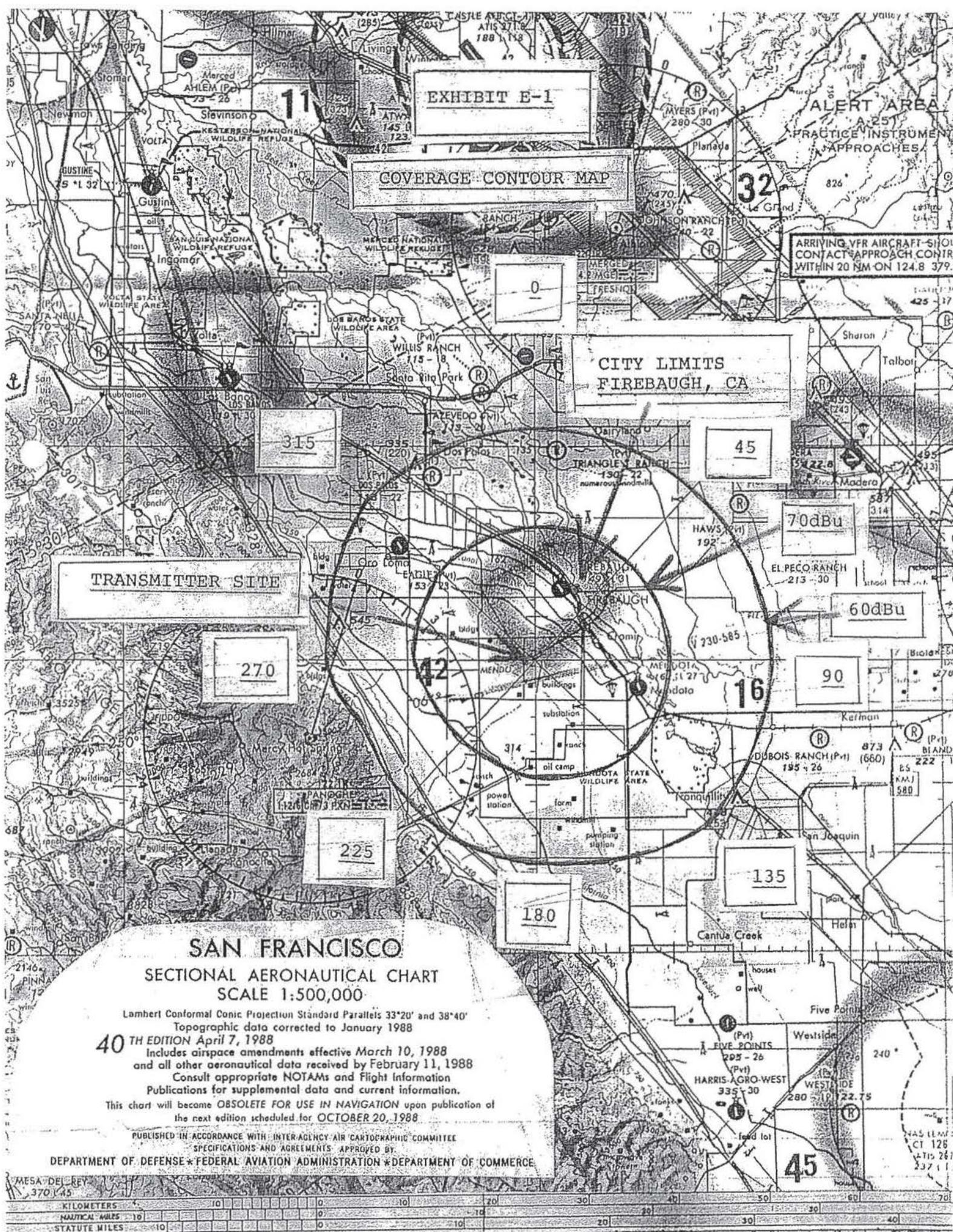


EXHIBIT E-1

COVERAGE CONTOUR MAP

CITY LIMITS
FIREBAUGH, CA

ARRIVING VFR AIRCRAFT SHOULD CONTACT APPROACH CONTROLLER WITHIN 20 NM ON 124.8 379.

TRANSMITTER SITE

SAN FRANCISCO
SECTIONAL AERONAUTICAL CHART
SCALE 1:500,000

Lambert Conformal Conic Projection Standard Parallels 33°20' and 38°40'
Topographic data corrected to January 1988
40TH EDITION April 7, 1988
Includes airspace amendments effective March 10, 1988
and all other aeronautical data received by February 11, 1988
Consult appropriate NOTAMS and Flight Information
Publications for supplemental data and current information.
This chart will become **OBSOLETE FOR USE IN NAVIGATION** upon publication of
the next edition scheduled for **OCTOBER 20, 1988**

PUBLISHED IN ACCORDANCE WITH INTER-AGENCY AIR CARTOGRAPHIC COMMITTEE
SPECIFICATIONS AND AGREEMENTS APPROVED BY
DEPARTMENT OF DEFENSE * FEDERAL AVIATION ADMINISTRATION * DEPARTMENT OF COMMERCE

KILOMETERS	0	10	20	30	40	50	60	70
NAUTICAL MILES	0	10	20	30	40	50	60	70
STATUTE MILES	0	10	20	30	40	50	60	70

FM SPACING STUDY

TITLE: FIREBAUGH, CA
CHANNEL 276A (103.1 MHZ)
DATABASE: DW 10/11/88

LATITUDE: 36-47-30
LONGITUDE: 120-30-00
SAFETY ZONE: 26 KM

CALL	AUTH	LICENSEE NAME	CHAN	ERP=KW	LATITUDE	BR=TO	DIST.	REQ.
CITY OF LICENSE	ST	FCC FILE NO.	FREQ	EAH=M	LONGITUDE	-FROM	(KM)	(KM)
KSJO	LIC	NARRAGANSETT BCG CO OF C	222B	50	37-12-33	292.7	122.6	16
SAN JOSE		CA BLH-870424KB	92.3	142	121-46-30	111.9	106.6	CLEAR
NEW	APP	GREGORY S GENETTI	223A	3	37-16-26	352.8	53.94	8
ATWATER		CA 871207MA	92.5	100	120-34-35	172.8	45.94	CLEAR
AMENDED 07/06/88								
KDON-FM	LIC	HENRY BCG CO	273B	18.5	36-45-20	267.7	89.37	69
SALINAS		CA	102.5	692	121-30-00	87.1	20.37	CLEAR
WAS KDON 05/14/86								
KDON-FM	CP	HENRY BCG CO	273B	18.5	36-45-23	267.8	89.49	69
SALINAS		CA BPH-860813IC	102.5	692	121-30-05	87.2	20.49	CLEAR
CP GRANTED 03/12/87								
KTHT	LIC	KUSO BCG	274B	50	36-49-07	87.8	88.47	69
FRESNO		CA	102.7	152	119-30-33	268.4	19.47	CLEAR
KTHT SET ASIDE; WAS KKNU 04/01/88								
KXEM-FM	CP	CABALLERO SPANISH MEDIA	275A	3	35-38-40	138.7	168.7	64
MCFARLAND		CA BPH-860707OG	102.9	100	119-16-08	319.5	104.7	CLEAR
DELETION PROPOSED; CP GRANTED 12/14/87; CALL GRANTED 02/24/88								
ALLOC		SITE RESTRICTION 4.5 MI	276A		36-47-42	81.0	2,361	105
FIREBAUGH		CA DOC-84-231	103.1		120-28-26	261.0	-103	SHORT
FILING WINDOW 05/12-06/16/88								
KBEE-FM	LIC	PRICE BROADCASTING CO	277B	50	37-34-30	319.3	115.3	105
MO STO		CA	103.3	152	121-21-13	138.8	10.34	CLOSE
KSU	LIC	SANTA CLARA COLLEGE	*277D	.030	37-20-53	296.3	142.2	
SANTA CLARA		CA	103.3		121-56-25	115.4		
NE	APP	CATHERINE ODA GRODZINS	278A	3	36-37-18	261.4	121.1	27
SEA IDE		CA 880701MK	103.5	1	121-50-19	80.6	94.09	CLEAR
KM X	LIC	KMGX CORPORATION	279B	50	36-33-36	111.0	71.34	69
HANFORD		CA BLH-7232	103.7	152	119-45-20	291.4	2,340	CLOSE

>> END OF CHANNEL 276A STUDY <<

FM SPACING STUDY

TITLE: FIREBAUGH, CA
CHANNEL 276A (103.1 MHZ)
DATABASE: FCC 08/26/88

LATITUDE: 36-47-30
LONGITUDE: 120-30-00
SAFETY ZONE: 26 KM

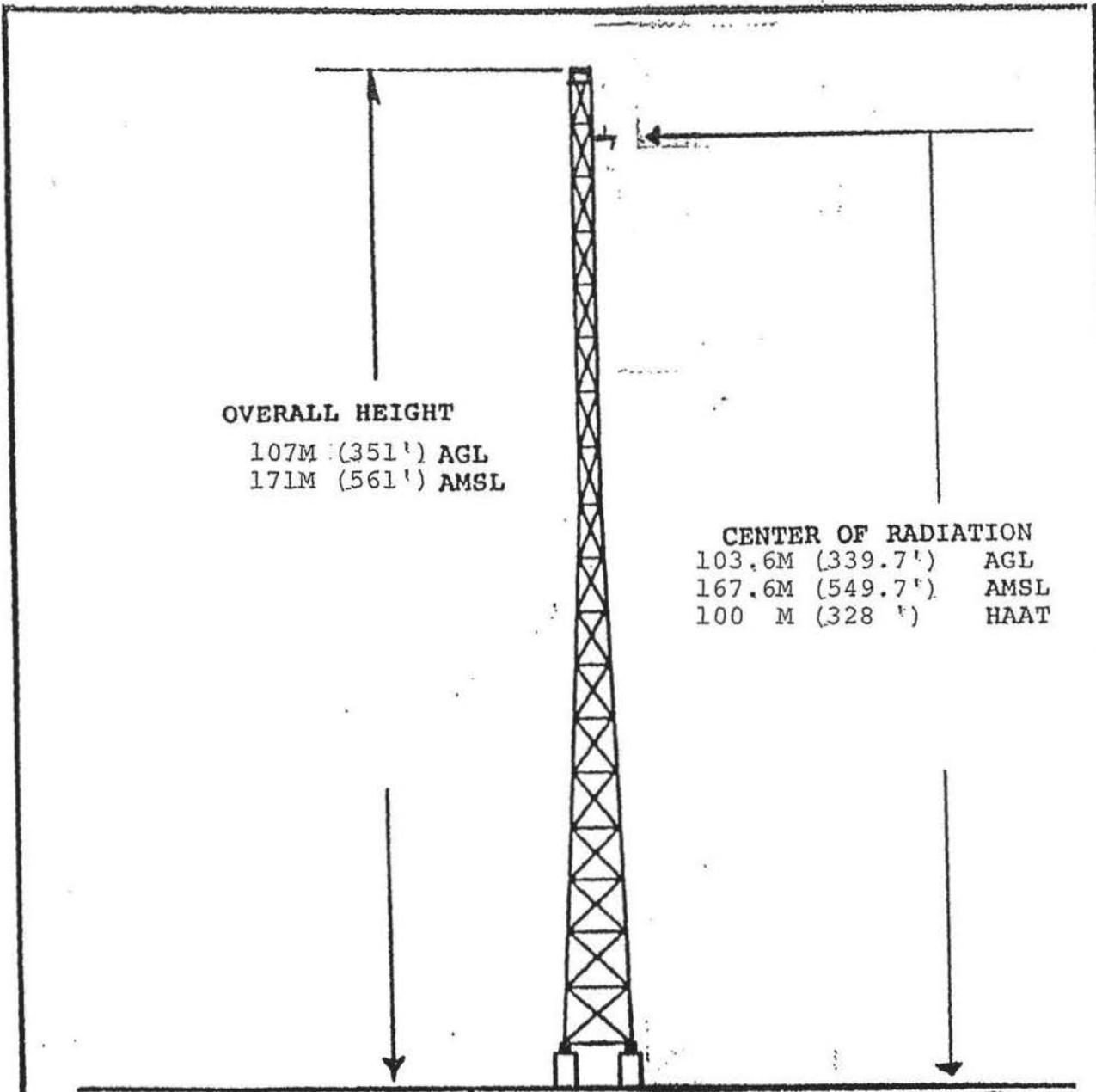
CALL	AUTH	LICENSEE NAME	CHAN	ERP-KW	LATITUDE	BR-TO	DIST.	REQ.
CITY OF LICENSE	ST	FCC FILE NO.	FREQ	EAH-M	LONGITUDE	-FROM	(KM)	(KM)
KSJO	LIC	NARRAGANSETT B/CTING CO.	222B	50	37-12-33	292.7	122.6	16
SAN JOSE		CA BLH-870424KB	92.3	142	121-46-30	111.9	106.6	CLEAR
NEW	APP	GREGORY S. GENETTI	223A	3	37-16-26	352.8	53.94	8
ATWATER		CA 871207MA	92.5	100	120-34-35	172.8	45.94	CLEAR
UNTIMELY FILED-AMENDED 880706								
KDON-FM LIC		HENRY BROADCASTING COMPA	273B	18.5	36-45-20	267.7	89.37	69
SALINAS		CA BLH-7487	102.5	692	121-30-00	87.1	20.37	CLEAR
GRANDFATHERED AT 18.5KW @ 692M HAA								
KDON-FM CP		HENRY BROADCASTING COMPA	273B	18.5	36-45-23	267.8	89.49	69
SALINAS		CA BPH-860813IC	102.5	692	121-30-05	87.2	20.49	CLEAR
EQUIVALENT TO GRANDFATHERED LICENS								
KTHT	LIC	KUSU BROADCASTING	274B	50	36-49-07	87.8	88.47	69
FRFSNU		CA BLH-6507	102.7	152	119-30-33	268.4	19.47	CLEAR
ALLOCH			275A		35-40-42	137.0	168.3	64
MCFARLAND		CA DOC-84-231	102.9		119-13-42	317.7	104.3	CLEAR
# 13; FILING WINDOW 06/06-07/07/86								
ALLOCH			276A		36-47-42	81.0	2.361	105
FIREBAUGH		CA DOC-84-231	103.1		120-28-26	261.0	-103	SHORT
# 66 - SITE RESTRICTED; FILING WINDOW 05/12-06/16/88								
EE-FM LIC		PRICE BROADCASTING COMPA	277B	50	37-34-30	319.3	115.3	105
MODESTO		CA BLH-840418DD	103.3	152	121-21-13	138.8	10.34	CLOSE
GRANDFATHERED AT 50KW @ 152M HAAT								
KSCU	LIC	SANTA CLARA COLLEGE	277D	0.030	37-20-53	296.3	142.2	
SANTA CLARA		CA BLED-821108AX	103.3		121-56-25	115.4		
NEW	APP	CATHERINE ODA GRODZINS	278A	3	36-37-18	261.4	121.1	27
SEASIDE		CA 880701MK	103.5	100	121-50-19	80.6	94.09	CLEAR
KMGX	LIC	KMGX CORPORATION	279B	50	36-33-36	111.0	71.34	69
HANFORD		CA BMLH-870921KH	103.7	152	119-45-20	291.4	2.340	CLOSE

>> END OF CHANNEL 276A STUDY <<

EXHIBIT E-4

ENVIRONMENTAL IMPACT STATEMENT

The proposed tower will be located in a rural, non-populated area. There are no residences, businesses, or population within the blanketing contour area. Outside of the blanketing contour area, the area where the tower will be located is also non-populated and is composed of rural farmlands. The proposed tower will be 351' tall and will be located on privately owned land more than 6 miles from any airport or national park. The area where the tower is proposed has not been involved in any environmental controversies or disputes.



OVERALL HEIGHT
 107M (351') AGL
 171M (561') AMSL

CENTER OF RADIATION
 103.6M (339.7') AGL
 167.6M (549.7') AMSL
 100 M (328 ') HAAT

SITE ELEVATION 64 M (210') AMSL
 351' SELF SUPPORTED STEEL TOWER AND TRANSMITTER BUILDING,
 TO BE CONSTRUCTED. PAINTED AND LIGHTED AS REQUIRED.
 SINGLE BAY CIRCULARLY POLARIZED FM ANTENNA TO BE SIDE MOUNTED
 ON TOWER, CENTERED AT THE 103.6 METER (339.7') LEVEL OF TOWER.

NOT DRAWN TO SCALE

GEOGRAPHIC COORDINATES
 36 - 47 - 30 X 120 - 30 00
 FIREBAUGH, CALIFORNIA
 FM CHANNEL 276-A
 103.1 MHZ - 3 KW ERP + 328' HAAT

EXHIBIT E - 5
 VERTICAL PLAN SKETCH OF TOWER
 NOT DRAWN TO SCALE
 10/13/88

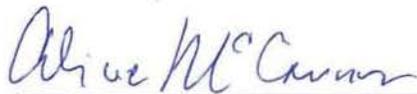
CERTIFICATE OF SERVICE

Alicia McCannon, an Enforcement Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has on this 22nd day of May, 2015, sent copies of the foregoing "ENFORCEMENT BUREAU'S MOTION FOR LEAVE TO FILE A MOTION TO DELETE ISSUES" to:

The Honorable Richard L. Sippel
Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554 (by hand, courtesy copy)

William Zawila, Esq.
12600 Brookhurst Street, Suite 105
Garden Grove, CA 92804-4833 (by first-class mail)

Michael Couzens
Michael Couzens Law Office
6536 Telegraph Avenue
Suite B201
Oakland, CA 94609
(by first-class mail and email to cuz@well.com)



Alicia McCannon