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FEB 15 2005

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

Federal Communications Commission  
Office of the Secretary

In the Matter of	)	MB Docket No. 04-191
	)	
<b>San Francisco Unified School District</b>	)	
	)	
For Renewal of License for Station KALW(FM),	)	Facility ID No. 58830
San Francisco, California	)	File No. BRED-19970801YA

To: Chief Administrative Law Judge  
Richard L. Sippel

**ENFORCEMENT BUREAU'S  
MOTION TO ENLARGE ISSUES**

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1. The Enforcement Bureau (the "Bureau"), pursuant to section 1.229 of the Commission's rules,<sup>1</sup> hereby submits its Motion to Enlarge Issues in the above-captioned proceeding. As demonstrated herein, the designated issues should be enlarged to include the following additional issue:

To determine whether San Francisco Unified School District made misrepresentations of fact and/or lacked candor during discovery.

2. The Commission commenced this proceeding on July 16, 2004, and specified the following issues:

1. To determine whether San Francisco Unified School District falsely certified its application with respect to the completeness of the KALW(FM) public inspection file and the effect thereof on its qualifications to be a Commission licensee.
2. To determine whether San Francisco Unified School District made misrepresentations of fact or was lacking in candor and/or violated Section 73.1015 of the Commission's Rules with regard to its certification in the subject license renewal application that it had placed in the KALW(FM)

<sup>1</sup> As demonstrated herein, the Bureau bases this Motion on newly discovered facts contained in documents produced in this proceeding by the San Francisco Unified School District ("SFUSD") on February 2, 2005. Accordingly, the Bureau submits that its Motion is timely filed. See 47 C.F.R. §1.229.

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public inspection file at the appropriate times the documentation required by Section 73.3527, and the effect thereof on its qualifications to be a Commission licensee.

3. To determine, in light of the evidence adduced pursuant to the specified issues, if the captioned application for renewal of license for station KALW(FM) should be granted.<sup>2</sup>

The *HDO* also ordered that, irrespective of whether the hearing record warranted denial of SFUSD's renewal application for Station KALW(FM), it was to be determined whether a forfeiture not to exceed \$300,000 should be issued against SFUSD for willful and/or repeated violations of sections 73.1015, 73.3527 and/or 73.3613 of the Commission's rules.

3. The Bureau commenced discovery in August 2004 by submitting interrogatories to SFUSD. In addition, the Bureau served upon SFUSD a request to admit facts and the genuineness of certain documents. In September 2004, the Bureau also served a request for documents upon SFUSD and deposed various individuals, including current KALW(FM) general manager Nicole Sawaya. In light of the designated issues, the Bureau was particularly interested in obtaining evidence as to what station employees knew about the KALW(FM) public inspection file in: 1) late July/early August 1997 when SFUSD filed the above-captioned renewal application; 2) December 1997/January 1998, when SFUSD prepared and filed its opposition to the petition to deny filed by Golden Gate Public Radio; and 3) February/April 2001, when SFUSD received

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<sup>2</sup> See *San Francisco Unified School District*, Hearing Designation Order and Notice of Apparent Liability for Forfeiture, 19 FCC Rcd 13326, 13337-38, ¶ 24 (2004) ("*HDO*"). Subsequently, the Presiding Administrative Law Judge granted in part a motion to enlarge filed by SFUSD in order to allow it to introduce evidence of meritorious service for the periods November 3, 1996 to November 3, 1997 and July 16, 2003 to July 16, 2004. See *Memorandum Opinion and Order*, FCC 04M-31 (rel. Oct. 8, 2004).

and responded to a letter of inquiry (“LOI”) from the Commission’s Mass Media Bureau.

Accordingly, the Bureau’s first document request asked SFUSD to produce, *inter alia*:

7. All Documents relating to the preparation, approval, filing and maintenance of the Station Issues/Program Lists from December 1, 1990 to the present.<sup>3</sup>

In response thereto, SFUSD produced two handbooks, a checklist and 11 pages of e-mail messages between various station employees. All but one page of the e-mail messages are dated in 2003 and 2004.<sup>4</sup> The lone exception is an e-mail message from former general manager, Michael Johnson, to William Helgeson, operations manager, dated January 13, 2000.

4. During his September 28, 2004, deposition, in answering questions about SFUSD’s response to the February 2001 Commission staff letter of inquiry (“LOI”), Mr. Helgeson typically stated that he did not know or did not recall supplying the factual details set forth in that response, notwithstanding that he had supplied the only verifying declaration to the response.<sup>5</sup> Indeed, Mr. Helgeson’s answers generally stated that SFUSD’s answers to the LOI’s first two questions, which focused on the presence of required ownership reports and issues/programs lists in the station’s public inspection file at the time of Station KALW(FM)’s 1997 renewal application certification, were based not on his personal knowledge or the knowledge of anyone else then at the station, but rather on the application certification made by Mr. Ramirez in 1997.<sup>6</sup> In this regard,

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<sup>3</sup> See “Enforcement Bureau’s First Request for Production of Documents from San Francisco Unified School District,” served September 14, 2004 (Attachment 1).

<sup>4</sup> See Attachment 2 (e-mail messages).

<sup>5</sup> See Helgeson Deposition, p. 274, line 2 – p. 278, line 17; p. 286, line 8 – p. 294, line 2; p. 296, line 15 – p. 300, line 21 (Attachment 3).

<sup>6</sup> See, e.g., Helgeson Deposition, p. 314, line 7 – p. 317, line 11 (Attachment 4).

there was no indication that Ms. Sawaya had any role in gathering or verifying the information provided in SFUSD's LOI response.

5. During her September 28, 2004, deposition, Ms. Sawaya was questioned about her knowledge of the LOI, which had been sent to Ernest Sanchez, SFUSD's then communications counsel, some three weeks before Ms. Sawaya took over as the general manager for Station KALW(FM). As the transcript attached hereto reflects, Ms. Sawaya denied having been asked by anyone to respond to the specific questions in the LOI and professed to have no knowledge as to who had been asked to respond.<sup>7</sup> She testified that she had seen the station's April 2001 response to the LOI only in draft form and that she could not remember whether she had been asked to provide any information relative to the response.<sup>8</sup> She also testified that she did not remember talking with Mr. Helgeson about the contents of the response to the first LOI question.<sup>9</sup> Finally, Ms. Sawaya testified that she did not know how the 1995 supplemental ownership report came to be prepared and that she did not know whether the station's public file contained all the issues/programs lists required by the Commission's rules.<sup>10</sup> In sum, Ms. Sawaya's testimony reflected that she had nothing to do with the substance of SFUSD's April 2001 response to the LOI, but that, as far as she knew, that response had been answered truthfully.

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<sup>7</sup> See "Interview of Nicole Sawaya" (Sept. 28, 2004) ("Sawaya Deposition"), p. 368, line 8 – p. 370, line 10; *see also* p. 379, line 6 – p. 393, line 5 (Attachment 5).

<sup>8</sup> See Sawaya Deposition, p. 370, line 18 – p. 371, line 2; p. 374, line 13 – p. 376, line 21 (Attachment 6).

<sup>9</sup> See Sawaya Deposition, p. 377, line 24 – p. 378, line 1 (Attachment 7).

<sup>10</sup> See Sawaya Deposition, p. 387, line 22 – p. 388, line 14; p. 392, line 23 – p. 393, line 5 (already included as part of Attachment 5).

6. On February 2, 2005, in response to the Bureau's second and third requests for documents, SFUSD provided unredacted bills from The Sanchez Law Firm to SFUSD as well as copies of various communications between SFUSD and The Sanchez Law Firm. These documents related to SFUSD's renewal application certification that all required documents had been placed in the KALW(FM) public inspection file at the appropriate times. Among these documents were bills, memos and e-mail messages indicating that, beginning March 6, 2001, some five days after she arrived at the station, Ms. Sawaya engaged in conversations (often with Mr. Helgeson) and drafted documents relating to the station's forthcoming response to the LOI.<sup>11</sup> Most telling for the purpose of this Motion is a memo from Ms. Sawaya on March 8, 2001, that contains her views as to how the LOI should be answered. A comparison of the memo with SFUSD's response to the LOI reveals not only a stark contrast between the two documents but also raises questions about the truthfulness of Ms. Sawaya's deposition testimony with respect to her knowledge of and involvement with SFUSD's LOI response.

7. In view of the foregoing, the Bureau submits that the issues should be enlarged as noted above to explore further whether the SFUSD's responses to discovery in this

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<sup>11</sup> In accordance with an understanding between counsel for SFUSD and counsel for the Bureau, the Bureau is submitting to the Presiding Administrative Law Judge (with a copy to counsel for SFUSD) selected documents referenced above, which contain arguably privileged material, separate from this Motion with a request that, for the present, they be kept confidential and not made available for public inspection, absent an order from the Presiding Administrative Law Judge to the contrary or approval from counsel for SFUSD.

proceeding, especially deposition testimony, were truthful.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James W. Shook". The signature is written in a cursive style with a large, sweeping initial "J".

William D. Freedman, Deputy Chief  
James W. Shook, Special Counsel  
Dana E. Leavitt, Special Counsel  
Investigations and Hearings Division  
Enforcement Bureau

Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 4-C330  
Washington, D.C. 20554  
(202) 418-1420

February 15, 2005

CERTIFICATE OF SERVICE

Dana E. Leavitt, Special Counsel in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has, on this 15th day of February, 2005, sent by first class United States mail, electronic mail (e-mail) and/or delivered by hand, copies of the foregoing "Enforcement Bureau's Motion to Enlarge Issues" to:

Marissa G. Repp, Esq. (by first class and electronic mail)  
Hogan & Hartson L.L.P.  
555 Thirteenth Street, N.W.  
Washington, D.C. 20004-1109

Louise H. Renne, Esq. (by first class and electronic mail)  
Renne Sloan Holtzman & Sakai, LLP  
50 California St. Suite 2100  
San Francisco, Ca. 94111

Chief Administrative Law Judge Richard L. Sippel (by hand)  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 1-C768  
Washington, D.C. 20054



Dana E. Leavitt

# **ATTACHMENT 1**

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

In the Matter of	)	<b>MB Docket No. 04-191</b>
	)	
<b>San Francisco Unified School District</b>	)	
	)	
For Renewal of License for Station KALW(FM),	)	Facility ID No. 58830
San Francisco, California	)	File No. BRED-19970801YA

To: San Francisco Unified School District

**ENFORCEMENT BUREAU'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS  
FROM SAN FRANCISCO UNIFIED SCHOOL DISTRICT**

The Enforcement Bureau (the "Bureau"), by its attorneys and pursuant to section 1.325 of the Commission's rules,<sup>1</sup> hereby requests that, within ten (10) days of service of this Request, the San Francisco Unified School District ("SFUSD") produce the Documents, as defined and specified herein, for inspection and copying. SFUSD shall produce such Documents at the offices of the Investigations and Hearings Division, Enforcement Bureau, Federal Communications Commission, Suite 4-C330, 445 12<sup>th</sup> Street, S.W., Washington, D.C. 20554, or at some location that is mutually acceptable to the Bureau and SFUSD.

**Instructions**

Each Document produced shall be identified by the number of the Document request to which it is responsive, and each Document shall be produced in its entirety, even if only a portion of that Document is responsive to a request herein. This means that the Document shall not be edited, cut, or expunged, and shall include all appendices, tables, or other attachments, and all other Documents referred to in the Document or

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<sup>1</sup> 47 C.F.R. §1.325.

attachments. All written materials necessary to understand any Document responsive to these inquiries must also be produced.

If a Document responsive to any request herein existed but is no longer or not currently available, or if SFUSD is unable for any reason to produce a Document responsive to any request, each such Document shall be identified by author, recipient, date, title, and specific subject matter, and a full explanation shall be provided why the Document is no longer available or why SFUSD is otherwise unable to produce it.

If any Document produced in response to any request herein is not dated, the date on which the Document was prepared shall be provided. If any Document does not identify its author(s) or recipient(s), the name(s) of the author(s) or recipient(s) of the Document shall be provided.

This request is continuing in nature, requiring immediate production if a further or different Document responsive to any request herein comes into the possession, custody, or control of SFUSD during the pendency of this proceeding.

If production of any Document responsive to any request herein called for by this request is refused pursuant to a claim of privilege, the Document shall be identified by reference to its author, recipient(s) (including any person receiving a copy, regardless of whether that recipient is listed on the Document), date, and subject matter. The basis for the privilege claimed for such Document shall be specified with sufficient precision to permit assessment of the applicability of the privilege involved.

The period of time covered is specified in each request.

## Definitions

For this Request, the following definitions apply:

- a. "SFUSD" means San Francisco Unified School District, and/or any person acting on its behalf, or under its direction and control (including legal counsel) from December 1, 1990, to the present.
- b. "KALW" or the "Station" means noncommercial radio broadcast Station KALW(FM), San Francisco, California, and its staff.
- c. "Commission" or the "FCC" means the Federal Communications Commission and any employee thereof.
- d. "Application" means the application filed at the FCC on August 1, 1997, by SFUSD for renewal of its license for KALW (File No. BRED-19970801YA).
- e. "Board" means the San Francisco Board of Education.
- f. "Ownership Report" means FCC Form 323 and any supplement thereof as defined by 47 C.F.R. § 73.3615 and its predecessors.
- g. "Public Inspection File" means that file required to be maintained by noncommercial broadcast licensees pursuant to 47 C.F.R. § 73.3527 and its predecessors.
- h. "Issues/Program Lists" means those lists required of noncommercial broadcast licensees pursuant to 47 C.F.R. § 73.3527(e)(8) and its predecessors.
- i. "Ramirez" means Jeffrey Ramirez, General Manger of KALW at the time the Application was filed with the FCC.
- j. "Document" means the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any taped,

recorded, transcribed, written, typed, printed, filmed, videotaped, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including but not limited to any book, pamphlet, periodical, contract, agreement, correspondence, letter, facsimile, e-mail, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, photograph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minutes, marketing plan, research paper, personnel file, personnel folder, preliminary drafts, or versions of all of the above, and computer material (print-outs, cards, magnetic or electronic tapes, disks and such codes or instructions as will transform such computer materials into easily understandable form) in the possession, custody, or control of SFUSD.

k. "Relate to" and "relating to" mean constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, concerns or in any way is pertinent to the specified subject, including documents concerning the preparation of the documents.

l. "All" shall be construed to include the word "any."

m. "Or" shall be construed to include the word "and," and the word "and" shall be construed to include the word "or."

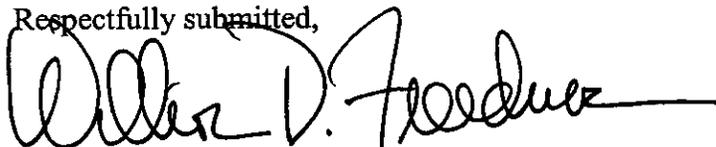
n. "Identify," when used with reference to a person or persons, shall mean to state his or her full legal name, current last known business address, current or last known business telephone number, current or last known home address, current or last known home telephone number, dates of employment or of association with SFUSD, titles held in SFUSD, positions held in SFUSD, descriptions of such positions, and, if applicable, reasons for no longer being employed or associated with SFUSD.

### Documents Requested

1. All Ownership Reports that were in the Station Public Inspection File on August 1, 1997.
2. All Ownership Reports that are currently in the Station Public Inspection File.
3. All Issues/Programs Lists that were in the Station Public Inspection File on August 1, 1997.
4. All Issues/Programs Lists that are currently in the Station Public Inspection File.
5. All Documents relied upon by Ramirez in determining and certifying to the accuracy of the "yes" answer given by SFUSD to Application Item 2 at page 3, which reads: "Has the applicant placed in its public inspection file at the appropriate times the documentation required by 47 C.F.R. Section 73.3526 and 73.3527?"
6. All Documents which identify the person(s) responsible for maintaining the Station Public Inspection File from December 1, 1990, to the present.
7. All Documents relating to the preparation, approval, filing and maintenance of the Station Issues/Program Lists from December 1, 1990, to the present.
8. All Documents which identify the person(s) responsible for the preparation, approval, filing and maintenance of the Station Issues/Program Lists from December 1, 1990, to the present.
9. All Documents relating to the preparation, approval, filing and maintenance of Station Ownership Reports from December 1, 1990, to the present.

10. All Documents which identify the person(s) responsible for the preparation, approval, filing and maintenance of the Station Ownership Reports from December 1, 1990, to the present.
11. All Documents relating to SFUSD's efforts to file the Station Ownership Reports with the Commission from December 1, 1990, to the present.
12. All Documents relating to KALW's budget during the period in which Ramirez was KALW's General Manager.
13. All Documents relating to KALW's current budget.
14. All Board minutes relating to Documents filed with the FCC by SFUSD between January 20, 1998, and August 3, 2001, which relate to SFUSD's responses to pleadings and inquiries regarding the Application.

Respectfully submitted,



William D. Freedman, Deputy Chief  
James W. Shook, Special Counsel  
Dana E. Leavitt, Special Counsel  
Investigations and Hearings Division  
Enforcement Bureau

Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 4-C330  
Washington, D.C. 20554  
(202) 418-1420

September 14, 2004

CERTIFICATE OF SERVICE

Dana E. Leavitt, Special Counsel in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has, on this 14th day of September, 2004, sent by first class United States mail, electronic mail (e-mail) and/or delivered by hand, copies of the foregoing "Enforcement Bureau's First Request for Production of Documents from San Francisco Unified School District" to:

Marissa G. Repp, Esq. (by first class and electronic mail)  
Hogan & Hartson L.L.P.  
555 Thirteenth Street, N.W.  
Washington, D.C. 20004-1109

Louise H. Renne, Esq. (by first class and electronic mail)  
Renne Sloan Holtzman & Sakai, LLP  
188 The Embarcadero, Suite 200  
San Francisco, CA 94105

Ernest T. Sanchez, Esq. (by first class and electronic mail)  
The Sanchez Law Firm  
2300 M Street, N.W., Suite 800  
Washington, D.C. 20037

Golden Gate Public Radio (by first class mail)  
284 Van Buren Avenue  
Oakland, California 94610



Dana E. Leavitt  
Dana E. Leavitt

## **ATTACHMENT 2**

To: "Michael Johnson" <mjohnsol@muse.sfusd.edu>  
From: William Helgeson <whelges@muse.sfusd.k12.ca.us>  
Subject: Re: Public File  
Cc:  
Bcc:  
Attached:

MJ:  
OK. Will do.  
Bill

At 07:25 AM 1/13/00 -0800, you wrote:  
> Bill, "" & 9. Also after this Saturday's Broadcast let's cycle  
>the DAT for Thistle and Shamrock to the trash heap. Also I'd like you to  
>coordinate the missing indormation for the public file. This means  
>tracking the mayoral candidates speeches and their dates from the  
>Commonwealth Club and City Visions DA race "". Please give me an  
>update by next Wednesday. Thanks.....Michael

SFUSD-00140

## Bill Helgeson

---

**From:** nfc-bounces@mailman.lmi.net on behalf of Ginny Z. Berson [ginnyz@nfc.org]  
**Sent:** Tuesday, June 29, 2004 1:08 PM  
**To:** NFCBlistserv  
**Subject:** [NFCB] Quarterly Issues Program Lists

It's almost the end of another quarter--and your quarterly issues program list must be in your Public File by July 10. This is an FCC requirement. Low Power stations are exempt from this requirement.

You must list several community issues that your programming addressed during the previous three months (April-June). The list must include the time, date, duration and title of programming in which the issues were covered.

---

NFCB mailing list  
NFCB@mailman.lmi.net <http://mailman.lmi.net/mailman/listinfo/nfc>



## Bill Helgeson

---

**From:** Bill Helgeson [whelges@muse.sfusd.edu]  
**Sent:** Wednesday, July 07, 2004 8:33 AM  
**To:** 'Rose Levinson'  
**Subject:** RE: City Visions Program Log, May thru June, 2004

Rose:

Thank you. Right on time!

Bill

-----Original Message-----

**From:** Rose Levinson [mailto:roselev@earthlink.net]  
**Sent:** Tuesday, July 06, 2004 4:09 PM  
**To:** whelges@muse.sfusd.edu  
**Subject:** City Visions Program Log, May thru June, 2004

Hi Bill,

Hope you're well. Attached is City Visions log for May thru June. Rose

## Bill Helgeson

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**From:** Bill Helgeson [whelges@muse.sfusd.edu]  
**Sent:** Thursday, April 08, 2004 9:16 AM  
**To:** 'Rose Levinson'  
**Subject:** RE: CITY VISIONS PROGAM LOG, JAN.-MARCH 2004

Rose:  
Got it this time.

Thanks.

Bill

-----Original Message-----

**From:** Rose Levinson [mailto:roselev@earthlink.net]  
**Sent:** Wednesday, April 07, 2004 12:31 PM  
**To:** Bill Helgeson  
**Subject:** RE: CITY VISIONS PROGAM LOG, JAN.-MARCH 2004

Hmmm, hope this works (though it's probable that I just didn't attach it--duh):

At 01:26 PM 4/7/04 -0700, you wrote:

>Rose:  
>Thanks but no attachment came thru with email. Pls resend. Thanks.  
>  
>Bill  
>  
>

>-----Original Message-----

>From: Rose Levinson [mailto:roselev@earthlink.net]  
>Sent: Wednesday, April 07, 2004 12:04 PM  
>To: whelges@muse.sfusd.edu  
>Subject: CITY VISIONS PROGAM LOG, JAN.-MARCH 2004  
>

>Hi Bill,  
>Attached is log for last quarter.  
>Cheers as them Brits say,  
>Rose

**Bill Helgeson**

---

**From:** Bill Helgeson [whelges@muse.sfusd.edu]  
**Sent:** Thursday, July 22, 2004 9:29 AM  
**To:** 'Eric Wayne'  
**Subject:** RE: oops Re: UpFront last month

Eric:

Thanks.

Bill

-----Original Message-----

**From:** Eric Wayne [mailto:brassandzin@sbcglobal.net]  
**Sent:** Thursday, July 22, 2004 8:42 AM  
**To:** Bill Helgeson  
**Subject:** oops Re: UpFront last month

June 11th 2004.

- 1) Andrew Lam, Marcelo Ballve, Maria ?, Earl Ofari-Hutchinson on how Ronald Reagan will be remembered in the ethnic media.
- 2) Holly Kernan reports on the "graduation" of foster kids from the foster care system.
- 3) Marcelo Ballve interviews Sergio Arau and Yareli Arizmendi the filmmakers of "A Day Without a Mexican."
- 4) Vivek Bald, on his documentary film "Mutiny" about Indian musicians in Britain.

Eric

On Thursday, July 8, 2004, at 03:32 PM, Bill Helgeson wrote:

Eric:

Can't seem to find rundown for June 11 show. Can you please resnd?

Bill

## Bill Helgeson

---

**From:** Bill Helgeson [whelges@muse.sfusd.edu]  
**Sent:** Wednesday, June 30, 2004 7:10 AM  
**To:** 'Nicole Sawaya'  
**Subject:** RE: [NFCB] Quarterly Issues Program Lists

N:  
Will do.

B.

-----Original Message-----

From: Nicole Sawaya [mailto:nsawaya@muse.sfusd.edu]  
Sent: Tuesday, June 29, 2004 1:42 PM  
To: whelges@muse.sfusd.edu  
Subject: Fwd: [NFCB] Quarterly Issues Program Lists  
Importance: High

>From: "Ginny Z. Berson" <ginnyz@nfc.org>  
>To: "NFCBListserv" <nfc@mailman.lmi.net>  
>Date: Tue, 29 Jun 2004 14:07:34 -0700  
>X-Mailer: Microsoft Outlook Express 6.00.2800.1409  
>Subject: [NFCB] Quarterly Issues Program Lists  
>X-BeenThere: nfc@mailman.lmi.net  
>X-Mailman-Version: 2.1.1  
>Reply-To: "Ginny Z. Berson" <ginnyz@nfc.org>  
>List-Id: <nfc@mailman.lmi.net>  
>List-Unsubscribe: <<http://mailman.lmi.net/mailman/listinfo/nfc>>,  
> <<mailto:nfc-request@mailman.lmi.net?subject=unsubscribe>>  
>List-Archive: <<http://mailman.lmi.net/pipermail/nfc>>  
>List-Post: <<mailto:nfc@mailman.lmi.net>>  
>List-Help: <<mailto:nfc-request@mailman.lmi.net?subject=help>>  
>List-Subscribe: <<http://mailman.lmi.net/mailman/listinfo/nfc>>,  
> <<mailto:nfc-request@mailman.lmi.net?subject=subscribe>>  
>Sender: nfc-bounces@mailman.lmi.net  
>  
>It's almost the end of another quarter--and your quarterly issues  
>program list must be in your Public File by July 10. This is an FCC  
>requirement. Low Power stations are exempt from this requirement.  
>  
>You must list several community issues that your programming addressed  
>during the previous three months (April-June). The list must include  
>the time, date, duration and title of programming in which the issues  
>were covered.  
>  
>  
>  
>-----  
>NFCB mailing list  
>NFCB@mailman.lmi.net <http://mailman.lmi.net/mailman/listinfo/nfc>

## Bill Helgeson

---

**From:** Bill Helgeson [whelges@muse.sfusd.edu]  
**Sent:** Monday, April 05, 2004 9:50 AM  
**To:** 'Nicole Sawaya'  
**Subject:** RE: Public File

N:

Will do. NPR should have their list out in couple of days per Marguerite Nutter (who was just thrilled to answer a question that wasn't about Bob Edwards!)

B.

-----  
Original Message-----

**From:** Nicole Sawaya [mailto:nsawaya@muse.sfusd.edu]  
**Sent:** Monday, April 05, 2004 7:43 AM  
**To:** whelges@muse.sfusd.edu  
**Subject:** Public File

Bill:

Please try to get all program information for the Winter Quarter 2004 for the public file as soon as possible.

Thanks,  
Nicole

## Bill Helgeson

---

**From:** Holly Kernan [equipo8@pacbell.net]  
**Sent:** Thursday, July 10, 2003 10:35 AM  
**To:** Bill Helgeson  
**Subject:** Re: program descripts

Will do!!

Coming very soon,

Holly

Bill Helgeson wrote:

Holly:  
Last program description I have for UpFront is the June 13 program. Need to complete my quarterly issues list for the station public file so sure would appreciate descripts of subsequent shows asap.  
Thanks.  
Bill  
KALW