



Corporation
for Public
Broadcasting

March 13, 2024

By email: (john@womr.org)

Mr. John Braden
Executive Director
WOMR-FM
PO Box 975
Provincetown, MA 02657

RE: Evaluation of WOMR-FM, Lower Cape Communications, Inc., Compliance with Selected Communications Act and General Provisions Transparency Requirements (Report No. ECR2315-2401)

Dear Mr. Braden,

The evaluation referenced above concluded that WOMR-FM (“WOMR”) was compliant with seven of nine applicable requirements in the Communications Act of 1932, 47 U.S.C. § 396, *et seq.* (“Communications Act”) and in the General Provisions and Eligibility Criteria (“General Provisions”) which govern the 2023 community service grant (“CSG”) awarded it by the Corporation for Public Broadcasting (“CPB”).

The specific findings and CPB's determinations for WOMR follow.

I. Posting Current Financial Information

The Communications Act requires stations to make available to the public their annual financial and audit reports and other financial information they are required to provide to CPB.¹ CPB also requires that each CSG recipient post its most recent audited financial statement and its most recent annual financial summary report (“FSR”) on its website.

The evaluation found that WOMR had posted its most recent audited financial statement but did not include its FSR, although it promptly uploaded the document. The evaluation recommended that CPB require WOMR to identify the corrective actions and controls it will adopt to avoid this error in the future.

Considering WOMR’s swift action to correct the issue, the corrective actions explained in the station’s correspondence,² and the penalty assessed below, we will not require additional documentation.

¹ General Provisions, Section 2 (C), Open Financial Records.

² Exhibit D of the evaluation report.

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Action: No further action is required of WOMR.

II. CAB Members

CPB requires stations to post the names of its CAB members on its website.³ The evaluation found that the CAB members identified on WOMR's website were not up-to-date, and it recommended that CPB require WOMR to identify the corrective actions and controls it will implement to avoid this error in the future.

Since WOMR updated its website to reflect the current CAB members before the evaluation's completion and with the penalty assessed below, we will not require additional documentation.

Action: No further action is required of WOMR.

III. CSG Non-compliance Policy

CPB adopted the CSG Non-compliance Policy to encourage grantees to comply with the applicable provisions governing their CSG and the Communications Act. Stations are subject to a penalty of \$5,000 for failure to comply with a category in the Communications Act and a penalty of \$1,000 for failure to comply with a category in the General Provisions.

Recognizing the prompt action WOMR took to address the issues raised in the evaluation and the corrective actions detailed in its correspondence,⁴ we will assess a reduced penalty of \$2,500 for its non-compliance with the open financial records requirements in the Communications Act and a reduced penalty of \$500 for its non-compliance with the General Provisions, i.e., identifying CAB members on its website.

Action: Within 45 days of the date of this correspondence, WOMR must provide the \$3,000 in penalties to CPB for its non-compliance with the Communications Act and the General Provisions, by forwarding a check payable to CPB to Nick Stromann, Vice President, Controller, Corporation for Public Broadcasting, 401 Ninth Street N.W., Washington, D.C. 20004-2129.

If you wish CPB to consider additional information relating to this matter, please provide the same in writing within 30 days of the date of this letter. Otherwise, CPB will consider these determinations final, and WOMR must comply with the actions set forth above. CPB reserves the right to take any other action it deems appropriate until these issues are resolved to CPB's satisfaction.

Kind regards,

Jackie J. Livesay

Jackie J. Livesay
Deputy General Counsel & Vice President, Compliance

³ General Provisions, Section 9 (B), Documents for Public Inspection: Website Posting Required.

⁴ Exhibit D of the evaluation report.

Mr. John Braden
WOMR-FM

CC: VIA ELECTRONIC MAIL

Sheila House, Licensee Official, WOMR-FM (hitthedunes@gmail.com)
Michael Levy, Executive Vice President & Chief Operating Officer, CPB
Evan Slavitt, Senior Vice President & General Counsel, CPB
William P. Tayman, Jr., Chief Financial Officer & Treasurer, CPB
Kimberly Howell, Inspector General, CPB
William J. Richardson, III, Senior Director & Deputy Inspector General, CPB
Kathy Merritt, Senior Vice President, Radio, Journalism & CSG Services, CPB
Katherine Arno, Vice President, Community Service Grants and Station Initiatives, CPB
Nick Stromann, Vice President, Controller, CPB
Andrew Charnik, Director, Radio CSG Policy & Administration, CPB
Forrest Lillibridge, Director, Grants Administration, CPB