



Corporation
for Public
Broadcasting

December 22, 2022

VIA ELECTRONIC MAIL

Mr. Mark Rasor
Vice President for Administration and Finance
KRSU-TV, Rogers State University
1701 W. Will Rogers Blvd.
Claremore, OK 74017

Dear Mr. Rasor,

RE: Evaluation of KRSU-TV, Compliance with Selected Communications Act and Transparency Requirements (Report No. ECR2215-2212)

The evaluation referenced above concluded that KRSU-TV (KRSU), licensed to the Board of Regents of the University of Oklahoma/Rogers State University, Claremore Oklahoma, was compliant with eight of nine select requirements in the Communications Act of 1932, 47 U.S.C. §396, et sec. (Communications Act), and in the General Provisions and Eligibility Criteria (General Provisions) governing the 2022 community service grant awarded it by the Corporation for Public Broadcasting (CPB).

The specific finding and CPB's determination for KRSU follow.

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 CPB¹. CPB finds stations compliant if they post their most recent audited financial statement and annual financial report (AFR) on their website. The evaluation found that KRSU had posted its most recent audited financial statement on its website but did not post its AFR, although it immediately corrected the issue when brought to its attention.

The report recommended that CPB require KRSU identify the controls it will implement to avoid this error in the future. KRSU, in its September 7, 2022 response, explained that it updated its procedures and will ensure required financial reports are posted on its website. Considering KRSU's immediate action, the controls it adopted to avoid this issue, and the penalty explained below, we are satisfied that it understands the requirement and will not require additional documentation.

CPB adopted the CSG Non-compliance Policy to encourage grantees to comply with the applicable provisions governing their CSG and the Communications Act. Failure to comply with a category in the Communications Act subjects the station to a penalty of \$5,000. In view of the prompt action KRSU took

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

Mr. Mark Rasor
Vice President for Administration and Finance
KRSU-TV

to correct the issue, its compliance representations, and the overall results of the report, we will assess a reduced penalty of \$2,500 for failure to post its most recent AFR on its website.

Action: KRSU must provide the \$2,500 penalty to CPB for its non-compliance within 45 days of the date of this correspondence. Accordingly, please forward a check payable to CPB, to the attention of 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 KRSU 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

CC: VIA ELECTRONIC MAIL

Larry Rice, President, Rogers State University
Angie Coats, Business Manager, KRSU-TV
Michael Levy, Executive Vice President & Chief Operating Officer, CPB
J. Westwood Smithers, Jr., 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, Journalism & CSG Services, CPB
Katherine Arno, Vice President, Community Service Grants and Station Initiatives, CPB
Nick Stromann, Vice President, Controller, CPB
Tim Bawcombe, Director, Television CSG Policy & Review, CPB
Forrest Lillibridge, Director, Grants Administration, CPB
Pat Saks, Director, Business & Administration, CPB