



Corporation
for Public
Broadcasting

Office of the Inspector General

**Audit of Community Service and Other Grants Awarded to WGCU TV/FM,
Licensed to Florida Gulf Coast University, Fort Myers, Florida
for the Period July 1, 2022 through June 30, 2024**

REPORT NO. ASJ2504-2511

July 16, 2025



Report in Brief

*Audit of Community Service and Other Grants Awarded to WGCU TV/FM,
Licensed to Florida Gulf Coast University, Fort Myers, Florida
for the Period July 1, 2022 through June 30, 2024*

What We Found

We found that WGCU TV/FM (WGCU) did not fully comply with all CPB requirements because WGCU:

- overstated Non-Federal Financial Support (NFFS) totaling \$123,700 resulting in potential Community Service Grants (CSG) overpayments of \$11,544;
- did not comply with the Communications Act of 1934, as amended (Act) and General Provisions and Eligibility Criteria (General Provisions) requirements to ensure required information is made available to the public for open meetings and open financial records.

What We Recommend

We recommend that CPB management require WGCU to:

- repay estimated CSG overpayments of \$11,544 (\$5,484 FY 2025 and \$6,060 FY 2026);
- fully comply with Act and General Provisions requirements for open meetings and open financial records; and
- identify the corrective actions and controls it has and will implement to ensure future compliance with CPB requirements for NFFS reporting requirements, and Act and General Provisions compliance.

In response to our draft report, WGCU management partially agreed with our findings and recommendations and has taken some corrective actions. Station management provided further context to explain the NFFS overstatement findings, noting that it relied on its Independent Public Accountants (IPAs) advice to report gross underwriting revenues and to expense related agency fees, and therefore did not exclude the fees from NFFS. WGCU agreed it did not have its most recent Annual Financial Report (AFR) and audited financial statement on its website at the time of our review. WGCU also provided additional context for why it felt that its advisory council did not meet the definition of a meeting under the Act, stating it was because it was in its organizational and planning stages, however it is now providing notice for advisory council meetings.

Why We Performed This Audit

We performed this audit based on our annual audit plan.

Our objectives were to determine whether the station: a) claimed NFFS on its AFRs in accordance with CPB's Financial Reporting Guidelines; b) complied with the Act and CPB's certification requirements; and c) expended CPB grant funds in accordance with grant requirements.

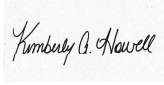
This report contains the conclusions of the Office of the Inspector General. CPB will make the final determination regarding our findings and recommendations.



Office of the Inspector General

Date: July 16, 2025

To: Donna Joe, Vice President and Deputy General Counsel
Kathy Merritt, Executive Vice President and Chief Operating Officer

From: Kimberly A. Howell, Inspector General  Digitally signed by
Kimberly Howell
Date: 2025.07.16
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Subject: Audit of Community Service and Other Grants Awarded to WGCU TV/FM,
Licensed to Florida Gulf Coast University, Fort Myers, Florida, for the Period
July 1, 2022 through June 30, 2024, Report No. ASJ2504-2511

Enclosed please find our final report which contains our findings and recommendations. The Corporation for Public Broadcasting (CPB) officials must make a final management decision on the findings and recommendations in accordance with established audit resolution procedures.

Accordingly, we request that you provide us with a draft written response to our findings and recommendations within 90 days of the final report. We will review your proposed actions and provide our feedback before you issue a final management decision to the grantee, which is due within 180 days of the final report. For corrective actions planned but not completed by the response date, please provide specific milestone dates so that we can track the implementation of corrective actions needed to close the audit recommendations.

We will post this report to the Office of the Inspector General's website and [Oversight.gov](https://www.oversight.gov) and distribute it to the appropriate Congressional committees as required by the Inspector General Act of 1978, as amended. Please refer any public inquiries about this report to our website or our office.

Enclosure

cc: Ruby Calvert, Chair, CPB Board of Directors
Elizabeth Sembler, Chair, Audit and Finance Committee, CPB Board of Directors
U.S. Senate Committee on Homeland Security and Governmental Affairs
U.S. House of Representatives Committee on Oversight and Accountability
U.S. Senate Committee on Commerce, Science and Transportation
U.S. House of Representatives Energy and Commerce Committee
U.S. Senate Committee on Appropriations
U.S. Senate Labor-HHS-Education Appropriations Subcommittee
U.S. House of Representatives Committee on Appropriations
U.S. House of Representatives Labor-HHS-Education Appropriations Subcommittee

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EXECUTIVE SUMMARY

We have completed an audit of the Corporation for Public Broadcasting (CPB) grants awarded to WGCU TV/FM (WGCU), licensed to Florida Gulf Coast University, Fort Myers, Florida. The grants reviewed included Television Community Service grants (CSG), Interconnection, Universal Service Support, Radio CSGs, and an Emergency Hurricane grant for the period July 1, 2022 through June 30, 2024.¹

Our objectives were to determine whether WGCU: a) claimed Non-Federal Financial Support (NFFS) on its Annual Financial Reports (AFRs) in accordance with CPB's Financial Reporting Guidelines (Guidelines); b) complied with the Communications Act of 1934, as amended (Act) and CPB's certification requirements; and c) expended CPB grant funds in accordance Television and Radio CSG General Provisions and Eligibility Criteria (General Provisions) and other grant requirements.

We found that WGCU did not fully comply with all CPB requirements because WGCU:

- overstated NFFS totaling \$123,700 resulting in potential CSG overpayments of \$11,544;
- did not comply with the Communications Act and General Provisions requirements to ensure required information is made available to the public for open meetings and open financial records.

We recommend that CPB management require WGCU to:

- repay estimated CSG payments of \$11,544 (\$5,484 FY 2025 and \$6,060 FY 2026);
- fully comply with Act and General Provisions requirements for open meetings and open financial records; and
- identify the corrective actions and controls it has and will implement to ensure future compliance with CPB requirements for NFFS reporting requirements, and Act and General Provisions compliance.

In response to our draft report, WGCU management partially agreed with our findings and recommendations and has taken some corrective actions. Station management provided further context to explain the NFFS overstatements, noting that it relied on its Independent Public Accountants (IPAs) advice to report gross underwriting revenues and to expense related agency fees, and therefore did not exclude the fees from NFFS. WGCU agreed it did not have its most recent AFR and audited financial statement on its website at the time of our review. WGCU provided additional context to explain why it felt that its advisory council did not meet the requirements for open meetings stating it was because it was in its organizational and planning stages, however it is now providing notice for these meetings. The station's written response is summarized after each finding and the complete response is presented as Exhibit F.

¹ We audited Act compliance for the period July 1, 2022 through March 2025.

Based on WGCU management's response to our draft audit report, we consider recommendations one and two unresolved pending CPB's final management decisions resolving our audit findings and recommendations, repayment of CSG grant overpayments and CPB's acceptance of WGCU's corrective actions. We consider recommendation three resolved but open pending CPB's final management decisions resolving our audit findings and recommendations, and recommendation four unresolved pending CPB's evaluation and acceptance of WGCU's corrective actions.

This report presents the conclusions of the Office of the Inspector General (OIG) and the findings do not necessarily represent CPB's final position on the issues. While we have made recommendations that are appropriate to resolve the findings, CPB officials will make final determinations on our findings and recommendations in accordance with established CPB audit resolution procedures.

BACKGROUND

WGCU Public Media is a department of and licensed to Florida Gulf Coast University (University) in Fort Myers, Florida. WGCU operates and manages WGCU-TV, WGCU-FM and WMKO-FM for the university. The financial activities related to public broadcasting activities are included in a separate financial statement and are the basis for annual financial reporting to CPB. This includes account activities within the University² as well as Florida Gulf Coast University Foundation, Inc., (Foundation)³ which are under the control of WGCU Public Media management. WGCU Public Media maintains a separate accounting system that includes the combined financial activities and is audited annually. The University and Foundation each receive a separate annual financial statement audit.

WGCU's mission as stated on its website is "To inspire, inform, educate, engage and entertain through the power of public media." The stations provide national television and radio content, as well as international and local programming serving all or part of 12 counties in the south and southwest Florida community. WGCU operates five distinct digital TV channels, three radio services, and multiple digital media platforms. WGCU is also a member of a statewide public radio emergency network whose members provide on-air emergency broadcasting to keep citizens informed with up-to-date news and safety information.

CPB's Community Service Grant Program

The Act provides that specific percentages of the appropriated funds CPB receives annually from the United States Treasury must be allocated and distributed to licensees and permittees of public TV and radio stations. After funds are designated as either TV or radio funds, the funds are placed in the appropriate CSG grant pool for distribution to eligible stations.

² The University financial activities related to WGCU include CPB grants, Florida Department of Education grants, licensee appropriations for payroll, indirect administrative support, broadband channel and tower income, and related expenses.

³ Foundation financial activities, include fundraising activities, investments and endowments, other income, and related expenses.

Each year CPB awards CSG grants to public TV and radio stations based in part on the amount of NFFS claimed by all stations on their AFRs. The CSG calculation process starts with separate amounts appropriated for the TV and radio CSG pools, adjusted by base grants and supplemental grants. The funds that remain are called the Incentive Grant Pools; one is for TV and the other is for radio.

The Incentive Rate of Return (IRR) is separately calculated for television and radio grantees. This is done by dividing the Incentive Grant Pools by the total adjusted NFFS claimed by all television grantees for the television IRR and by all radio grantees for the radio IRR. The IRR is then multiplied by each grantee's adjusted NFFS in various tiers to calculate the incentive award amount of its total CSG. There is a two-year lag between the reported NFFS and CPB's calculation of the fiscal year's (FYs) CSG amount. For example, CPB used the NFFS reported by the stations on their FY 2023 AFRs to determine the amount of the TV and Radio CSG funds the stations were awarded for FY 2025.

As shown in Exhibit A, WGPU received CSG, Interconnection, Universal Service Support, and other grant funds from CPB totaling \$2,874,736 for FYs 2023 and 2024. WGPU reported NFFS of \$22,120,539 (FY 2023 - \$8,914,228; FY 2024 - \$13,206,311) as shown in Exhibit D. Audited financial statements for the stations reported total revenues of \$27,473,038 for the two years audited (FY 2023 - \$11,176,219; FY 2024 - \$16,296,819). WGPU's fiscal year begins on July 1 and ends on June 30.

RESULTS OF AUDIT

In our opinion, WGPU complied with CPB requirements except for the specific requirements as summarized in the following paragraph for the FYs 2023 and 2024 grant reporting as examined in Exhibits B, C, and D. We reviewed WGPU management's assertions of compliance with CPB grant requirements: a) CSG Certification of Eligibility; b) CSG Legal Agreement; and c) AFR Signature Page. The CSG Certification of Eligibility includes WGPU's certification of compliance with AFR/NFFS reporting in accordance with CPB's Guidelines; Act requirements for open meetings, open financial records, equal employment opportunity (EEO) reporting and donor lists; use of CPB funds; and discrete accounting requirements. Our responsibility is to express an opinion on management's assertions about its compliance based on our examination.

We found that WGPU did not fully comply with all CPB requirements because WGPU:

- overstated NFFS totaling \$123,700 resulting in potential CSG overpayments of \$11,544;
- did not comply with the Communications Act and General Provisions requirements to ensure required information is made available to the public for open meetings and open financial records.

WGPU management has implemented new procedures to address our audit findings and ensure the stations' future compliance with CPB CSG requirements.

Our audit was conducted in accordance with the *Government Auditing Standards* for attestation examination engagements and, accordingly, included examining, on a test basis, evidence about

WGPU’s compliance with CPB’s requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. However, it does not provide a legal determination on WGPU’s compliance with specified requirements.

FINDINGS AND RECOMMENDATIONS

I. OVERSTATED NFFS

Based on our audit work, we found \$123,700 (\$67,540 FM and \$56,160 TV) in overstated NFFS that was reported on WGPU’s FY 2023 and FY 2024 AFRs. As a result, WGPU could receive potential CSG overpayments of \$11,544 (\$4,012 FM and \$7,532 TV) in FYs 2025 and 2026 as shown in the table below. We classified this amount as funds put to better use for reporting purposes because the funds overpaid to WGPU could have been distributed to other public broadcasting stations.

WGPU’s AFRs overstated underwriting contributions which resulted in overstated NFFS are summarized in the following table:

Overstated Underwriting NFFS and CSG Overpayments

Condition	FY 2023	FY 2024	Total
FM			
Agency Fees	\$ 32,064	\$ 28,455	\$ 60,519
Finders Fees	\$ 3,524	\$ 3,497	\$ 7,021
Total Overstated NFFS FM	\$ 35,588	\$ 31,952	\$ 67,540
CPB internal rate of return (IRR) FY 2025*	0.0593884275	0.0593884275	
Potential CSG overpayment FM	\$ 2,114	\$ 1,898	\$ 4,012
TV			
Agency Fees	\$ 25,128	\$ 31,032	\$ 56,160
Finders Fees			
Total Overstated NFFS TV	\$ 25,128	\$ 31,032	\$ 56,160
CPB internal rate of return (IRR) FY 2025*	0.1341081708	0.1341081708	
Potential CSG overpayment TV	\$ 3,370	\$ 4,162	\$ 7,532
Combined Overstated NFFS	\$ 60,716	\$ 62,984	\$ 123,700
Potential CSG overpayment	\$ 5,484	\$ 6,060	\$ 11,544

* To calculate potential FY 2026 CSG overpayments we utilized the existing FY 2025 IRR because the FY 2026 IRR has not been calculated.

Ineligible Underwriting – Agency Fees

WGCU reported ineligible NFFS claimed as underwriting contributions totaling \$116,679, (\$60,519 FM and \$56,160 TV) for third party advertising agency fees that were not constructively received. The third-party agencies represented the donor/underwriter and provided services to the donor to place the underwriting with WGCU. The station received the net underwriting donation after the fees were netted out. Station officials said it records underwriting support at full value (i.e., gross) and reports this amount as NFFS. They report underwriting commissions and agency fees (internal and external) separately as fundraising expenses. Therefore, it does not reduce the station’s NFFS by the amount of the cost of sales. Other stations in our previous audits who dealt with advertising agencies reported their NFFS net of advertising agency fees.

Some of the third-party agencies placed underwriting through state and national public media sponsorship organizations that represented WGCU as outside sales organizations. The portion of the fees that were for the benefit of the underwriter’s agency were not constructively received by WGCU; the additional fees were for the services that the public media sponsorship organization provided to WGCU and were considered cost of sales and met CPB’s constructive receipt criteria.

Specifically, as shown in the table below, WGCU overstated NFFS because it claimed agency fees as underwriting totaling \$116,679 (\$60,519 FM and \$56,160 TV) for FYs 2023 and 2024. These overstatements could result in potential CSG overpayments of \$11,126 (\$3,594 FM and \$7,532 TV) in FYs 2025 and 2026.

Overstated NFFS and CSG Overpayments - Ineligible Agency Fees

Condition	FY 2023	FY 2024	Total
FM:			
Local Agency	\$ 6,427	\$ 8,424	\$ 14,851
State sponsorship organization with secondary agency	\$ 19,080	\$ 16,169	\$ 35,249
National sponsorship organization with secondary agency	\$ 6,557	\$ 3,862	\$ 10,419
Total Overstated NFFS FM	\$ 32,064	\$ 28,455	\$ 60,519
CPB internal rate of return (IRR) FY 2025	0.0593884275	0.0593884275	
Potential CSG overpayment FM	\$ 1,904	\$ 1,690	\$ 3,594
TV:			
Local Agency	\$ 16,771	\$ 25,426	\$ 42,197
State sponsorship with secondary agency	\$ 8,237	\$ 5,606	\$ 13,843
National sponsorship organization with secondary agency	\$ 120	\$ -	\$ 120
Total Overstated NFFS TV	\$ 25,128	\$ 31,032	\$ 56,160
CPB internal rate of return (IRR) FY 2025	0.1341081708	0.1341081708	
Potential CSG overpayment TV	\$ 3,370	\$ 4,162	\$ 7,532
Combined Overstated NFFS	\$ 57,192	\$ 59,487	\$ 116,679
Potential CSG overpayment	\$ 5,274	\$ 5,852	\$ 11,126

CPB allows stations to claim underwriting contributions as NFFS. Regarding third party recipients CPB requires “constructive receipt” of contributions by a station to claim NFFS.

- A. Contribution. A contribution is a gift, grant bequest, donation or appropriation (i.e., the form criterion). For a contribution to be reported as NFFS, it must meet the following criteria.
 - 1. Recipient. The Contribution must be unconditionally provided to the CSG recipient. This includes contributions made indirectly, if Constructively Received.⁴

CPB Guidelines FYs 2023 and 2024, Part II, Section II – Recipient.

CPB guidelines clarify underwriting allowable as NFFS with respect to third party recipients, typically underwriting/advertising agencies.

Underwriting revenues may be provided directly or indirectly to the CSG recipient. For those provided indirectly, the CSG recipient must “constructively receive” the revenues. Constructive Receipt exists when there is a written agreement between the recipient and the third party that authorizes the third party to receive the underwriting revenues on the CSG recipient’s behalf (Constructive Receipt or Constructively Received). Below are examples.

Example #1: Donation. Oil Company donates \$200,000 to Station X to underwrite a television program it broadcasts about British royalty. Station X may report \$200,000 as NFFS.

Example #2: Constructive Receipt. Station X enters into written contract with a Sponsorship Placement Organization. Under the Contract, the Organization agrees to secure and receive the underwriting on Station X’s behalf. If the Organization secures \$200,000 in underwriting revenues from the Oil Company on Station X’s behalf, Station X may report \$200,000 as NFFS. Station X does not have to reduce the donation by the amount of the Organization’s fees.

Example #3: Lack of Constructive Receipt. Oil company enters into a written contract with an Advertising Agency to place underwriting donations on its behalf. Under the contract, Oil Company will donate \$200,000 to underwrite a television program in a major market from which the Advertising Agency will receive a fee of \$25,000. Advertising Agency secures underwriting on public television Station X. There is no written agreement between the Advertising Agency and Station X. Therefore, Station may report \$175,000 as NFFS, even if the documentation provided by Advertising Agency or Oil Company identifies the donation as \$200,000.

CPB Guidelines FYs 2023 and 2024. Part II: NFFS, Section VI NFFS: Underwriting Revenues.

As background on public media underwriting rates, we have found that stations have Gross rates and Net rates; Gross rates include markup for advertising agency fees. The Gross rate can

⁴ Defined in Section VI.

include the cost of creative work that goes into an underwriting (advertising) campaign, as well as an agency's costs for planning, placing, and handling the purchasing of time or space, and managing and tracking underwriting spots. Stations either gross up a net rate or discount a gross rate to bill the advertising agency so the agency can gross up to its client and collect its fees. The net rates are generally grossed up to include a customary 15% margin to cover the agency fees.

WGPU recognized the gross revenues as underwriting contribution income and the related fees as expenses. The station did not apply the CPB criteria for constructive receipt to the gross underwriting revenues for the third-party advertising agency fees and therefore did not deduct these fees from the NFFS claimed.

Consistent reporting of net underwriting revenues by all CSG stations helps ensure the equitable distribution of CSG funds.

As a result, WGPU overstated its underwriting NFFS totaling \$116,679 (\$60,519 FM and \$56,160 TV) for FYs 2023 and 2024. These overstatements could result in potential CSG overpayments of \$11,126 (\$3,594 FM and \$7,532 TV) in FYs 2025 and 2026.

Ineligible Underwriting - Payments/Exchange Transactions

In FYs 2023 and 2024, WGPU FM overstated its NFFS by claiming \$7,021 in finder's fees as underwriting contributions. The fees (payment for services) were received from an ineligible source for payments to be claimed as NFFS. The fees were received in exchange for referring an underwriter to the state public media sponsorship organization for the benefit of other Florida public media stations. The referring station receives a finder's fee of five percent of a buy's net revenue outside of its station as an incentive for participation. The overstated NFFS could result in potential CSG overpayment of \$417 in FYs 2025 and 2026.

The Act and CPB Guidelines define NFFS revenues as either contributions or payments and establish the criteria for each.

Revenues are either a contribution or a payment, and must meet the recipient, form, source, and purpose criteria below to be reported as NFFS.

A. Contribution. A contribution is a gift, grant, bequest, donation or appropriation (i.e. the form criterion). For a contribution to be reported as NFFS, it must meet the following criteria.

1. **Recipient.** The contribution must be unconditionally provided to the CSG recipient...
2. **Source.** The contribution may be from any source except the United States, any agency or instrumentality of the United States (i.e. the federal government), or a public broadcasting entity...
3. **Purpose.** The contribution must be provided to the CSG recipient to construct or operate a noncommercial educational broadcast station, or for the production, acquisition, distribution or dissemination of educational television or radio programs and related activities.

B. Payment. A payment is a reciprocal transfer of cash goods, and/or services (e.g. exchange transaction) and may be reported as NFFS, if it meets the criteria below.

1. **Recipient:** Public broadcasting entity or an organization that receives the revenue on its behalf.
2. **Form:** The payment must be in a form of an appropriation or contract payment.
3. **Source:** The payment must be made by a state⁵ or any educational institution.⁶
4. **Purpose:** The payment must be in exchange for services and materials with respect to the provision of educational or instructional television or radio programs.

CPB Guidelines FYs 2023 and 2024, Part II, Section II – Contributions vs. Payments.

The station received a finder's fee for finding underwriters for a state public media sponsorship organization for the benefit of other Florida public broadcasting stations. WGCU FM reported these fees as underwriting contributions, not as payments for services. It therefore did not evaluate the eligibility of the source of the payments or that the purpose was for the benefit of other public broadcasting stations. The sponsorship organization is an association of public broadcasters providing underwriting and other public broadcasting services to its Florida public broadcasting members, therefore not an eligible source for payments.

WGCU FM overstated NFFS by \$7,021 on its FYs 2023 and 2024 FM AFRs which resulted in potential CSG overpayments of \$417 (\$209 FY 2025 and \$208 FY 2026).

To summarize our findings on overstated NFFS for ineligible agency and finder's fees, WGCU overstated FYs 2023 and 2024 NFFS by \$123,700. As a result, the station received CSG overpayments of \$5,484 in FY 2025 and could receive potential CSG overpayments of \$6,060 in FY 2026 and could be subject to penalties pursuant to CPB's CSG noncompliance policy.

Recommendations:

We recommend that CPB management require WGCU to:

- 1) repay estimated CSG payments \$11,544 (\$5,484 FY 2025 and \$6,060 FY 2026); and
- 2) identify the corrective actions and controls it has and will implement to ensure future compliance with CPB requirements for NFFS reporting requirements,

WGCU Management Response:

In response to our draft report, WGCU management partially agreed with our findings and recommendations on overstated NFFS. Station management agreed that \$7,021 in finder's fees should have been classified as payment for services and excluded from NFFS. They provided further context regarding the \$116,679 that was included in gross underwriting revenue

⁵ State includes local governments, state agencies, the District of Columbia, U.S. territories, public schools, and Native American Tribes as described in the applicable year's General Provisions.

⁶ Payments provided by educational institutions that are public broadcasting entities (i.e., the licensee of another public broadcasting station) may not be reported as NFFS because public broadcasting entities are ineligible sources.

contributions for the third-party agency fees that we found were ineligible for NFFS. WGCU management stated they were following the advice of their IPAs to record the gross underwriting as revenues and as NFFS and the third-party fees as fundraising expenses. They also discussed that it is further complicated as WGCU works with both a national and state public media agency (underwriting agents) to place underwriting on WGCU's behalf, and the fees paid to these agencies are treated like staff commissions and are expensed. Station management said that these underwriting agents, working on behalf of WGCU, combine their staff commission and the unaffiliated agency fee as one number and the total fees are presented on the underwriting contract. The third-party unaffiliated agencies charge an additional 15 percent that is incorporated into the total fees included in the underwriting contracts and the underwriting is reported at gross and all the fees as fundraising expenses.

WGCU management as a result of the audit said they have undertaken additional staff training as it pertains to underwriting to ensure its compliance with CPB NFFS reporting. The station's complete written response is presented as Exhibit F.

OIG Review and Comment:

Based on WGCU management's response to our draft audit report, we consider recommendations one and two unresolved pending CPB's final management decision resolving our audit findings and recommendations, repayment/recovery of potential CSG overpayments, and acceptance of WGCU's corrective actions.

Further we evaluated the rationale for reporting gross underwriting revenues and related expenses for financial reporting, however CPB has additional criteria to apply to underwriting revenues for constructive receipt. Based on our interpretation of CPB's requirements, the unaffiliated third-party agency fees did not meet the constructive receipt criteria and therefore were not eligible for NFFS. Further, the unaffiliated third-party agencies were providing services for a fee to the donor/underwriters and could also be considered a form of payment for services, again not eligible for NFFS.

II. ACT AND CPB GENERAL PROVISION GRANT NONCOMPLIANCE

We found that WGCU was not fully compliant with the Act and CPB General Provisions transparency requirements to ensure required information is made available to the public to provide:

- seven (7) days advance notice of its Community Advisory Council⁷ meetings;
- its most recent audited financial statement and Annual Financial Report (AFR).

⁷ WGCU's CAB is referred to as the WGCU Advisory Council.

Advance Notice of Open Meetings

WGPU did not provide the public with the required 7-day advance notice for meetings of its Community Advisory Council and did not consider the meetings subject to Act open meeting requirements because it does not believe the meetings met the Act definition of a meeting and because the station was not required to have a Community Advisory Board (CAB).⁸

The station held nine Advisory Council meetings during our audit period prior to our fieldwork and did not provide advance notice for the nine meetings.⁹ After our audit began and we discussed the open meeting requirement for WGPU's Advisory Council meetings, the station took corrective action to provide the 7-day advance notice for the next public meeting and future meetings of its Advisory Council. Station management confirmed that until February 2025, it had not provided advance notice to the public for the Community Advisory Council meetings.

Based on our review of the Advisory Council minutes, website, by-laws and procedures, we concluded that station business was conducted with the Advisory Council members and WGPU staff, and the meetings should be subject to open meetings and advance notice requirements.

The Act requires permittees of public broadcasting stations to hold open meetings of its governing board, any committee of such governing body, or any advisory body of the governing board preceded by reasonable notice to the public.

The Act, 47 U.S.C. § 396 (k) (4).

The Act further defines the term meeting:

The term 'meeting' means the deliberations of at least the number of members of the governing or advisory body, or committee thereof, required to take action on behalf of such body or committee where such deliberations determine or result in joint conduct or disposition of the governing or advisory body's business, or the committee's business, as the case may be, but only to the extent that such deliberations relate to public broadcasting.

The Act, 47 U.S.C. § 397 (5).

CPB provides additional guidance:

C. Prerequisites for a "Meeting": In order for a gathering of board, committee, or CAB members to constitute a meeting under the Act, the following is necessary:

1. The presence of a quorum; and
2. Deliberations that determine or result in joint conduct or disposition of business relating to public broadcasting.

⁸ The Act and CPB grant requirements do not require state institutions to establish a CAB.

⁹ There were also three WGPU Advisory Council committee meetings held, but we could not determine if a quorum was present to determine if it met requirements for open meeting notices.

Note that deliberations do not require any formal action or vote. Any discussion of public broadcasting issues that may influence the opinion of members makes it a meeting.

CPB's Communications Act Compliance guidance, 1. Open Meetings, C. Prerequisites for a Meeting. (June 2021).

The Act, 47 U.S.C. §396 (k)(4), requires that stations provide the public with reasonable advance notice of open meetings. Specifically:

Funds may not be distributed pursuant to this subsection to the Public Broadcasting Service or National Public Radio (or any successor organization), or to the licensee or permittee of any public broadcast station, unless the governing body of any such organization, any committee of such governing body, or any advisory body of any such organization, holds open meetings preceded by reasonable notice to the public.

Further, CPB requires that stations provide the public with reasonable advance notice and defines reasonable notice as seven days advance notice, as follows.

- A. Open Meetings: Meetings of Grantee's governing body, its committees and CAB must be open to the public (47 U.S.C. § 396(k)(4)). In addition, CPB requires Grantee to give at least seven days advance notice of meetings, including the time and place, by:
 - 1. posting notice on its station website;
 - 2. broadcasting notice on-air between 6 a.m. and 11 p.m., as shown by the station's log;
 - 3. placing notice in the "Legal Notices" section of a local newspaper in general circulation in the station's primary coverage area; or
 - 4. giving notice through a recorded announcement accessible on the station's phone system.

CPB's Communications Act Compliance guidance, 1. Open Meetings, E. Notice of Open Meetings (June 2021). CPB Television and Radio CSG General Provisions 2024, Section 2.A. Open Meetings contains the same four options for advance notice of meetings.

We attribute this condition to the station being licensed to a state educational institution; institutional stations are not required to establish a Community Advisory Board pursuant to the Act. However, the Act and CPB require that any advisory body of the organization hold open meetings with adequate advance notice to the public. Station management did not believe that these advisory council meetings met the requirements for a meeting, nor were they required to provide advance notice, because it was not required to have a CAB. In addition, the station provided us with by-laws for the advisory council showing the nature of the council and its advisory role to WGPU. The station felt that most of the business conducted was advisory with no action taken and mostly related to fundraising and programming.

The station's website, which also lists the Advisory Council members, states its mission as: "The WGCU Advisory Council assists WGCU TV/FM in realizing its mission and its long-range goals. The council communicates to and on behalf of listeners, viewers and subscribers; provides input concerning public broadcasting to governmental agencies and elected officials; and assists in WGCU TV/FM engagement and fundraising activities."

Station management said that the meetings have never been noticed as they were treated as a council not a board, and further that the University does not allow for the establishment of other boards. Management also said the station was re-working the by-laws to ensure it was not being portrayed as a fiduciary board. WGCU management also described the Advisory Council as not always productively functioning, no regular attendance, sometime no quorums, and said that the Council's role was to serve as a fundraising and community input to WGCU and receive station updates on public media activities to the community.

Although the station does not believe that the Advisory Council meetings met the requirements for a meeting, it did take immediate action to notice all future meetings of WGCU's Advisory Council after we identified the noncompliance during our fieldwork.

WGCU was not in full compliance with Act and CPB grant requirements for advance notice of open meetings of its advisory body during our audit period and may be subject to penalties under CPB's CSG Non-Compliance Policy.

Public Access to Audited Financial Statements and Annual Financial Reports

The station was not fully compliant with Act and CPB grant requirements for open financial records because it did not post its most recent audited financial statement and AFR on its website at the time of our review.

We reviewed the station's website several times in January 2025 and found the station had not posted its most recent FY 2024 audited financial statements¹⁰ or FY 2023 TV and FM AFRs.¹¹ We found the FY 2023 audited financial statements and the FY 2022 TV and AFRs were posted on the station's website. We did not find any evidence that WGCU's AFRs for FY 2023 for both TV and FM had been previously posted.¹²

We performed our reviews prior to contacting the station with our audit engagement, January 6, 2025, as well as thereafter. CPB approved the FY 2023 AFRs on January 22, 2024 (submitted January 12, 2024).

After our entrance conference on January 28, 2025, the station identified that it needed to update its website for the FY 2024 audited financial statement and AFRs and this information was posted immediately. However, we noted on March 17, 2025, that the FY 2024 FM AFR was

¹⁰ The most recent audited financial statements were dated December 6, 2024, and were submitted to CPB on December 10, 2024.

¹¹ The FY 2024 AFRs were submitted to CPB December 10, 2024, and were approved on January 15, 2025. Therefore, at the time of our earlier reviews the FY 2023 AFRs were the most recent and approved AFRs that should have been posted to the station's website.

¹² We also checked web.archives.org and could not find any evidence of AFRs posted for FY 2023.

posted twice, and the FY 2024 TV AFR was not posted. OIG notified station management who took corrective action to ensure the most recent TV and FM AFRs were on the website, which we verified. The station is now compliant with open financial records requirements.

At the time of our reviews and during FY 2024, the station was not compliant with open financial records.

CPB requires grantees to make the audited financial statements and AFRs available for public inspection on the station website.

C. Open Financial Records: The Act requires stations to make available to the public their annual financial and audit reports and related financial information they are required to provide to CPB (47 U.S.C. § 396(k)(5) and § 396(1)(3)(b)). CPB also requires that Grantee post the following documents on its station website:

1. its most recent audited financial statement, or unaudited financial statement if permitted; and
2. its most recent AFR or FSR (whichever is applicable).

CPB 2024 Television and Radio CSG General Provisions and Eligibility Criteria, Section 2. Communications Act Requirements.

The Act also provides:

Funds may not be distributed pursuant to this subsection to any public telecommunications entity that does not maintain for public examination copies of the annual financial and audit reports, or other information regarding finances, submitted to the Corporation pursuant to subsection (l)(3)(B) of this section.

The Act, 47 U.S.C. § 396 (k)(5).

WGPU financial officials have procedures for ensuring its required financial records are posted to the WGPU station website in a timely manner. Generally, they have an annual website checklist they use to ensure compliance and request the website team to upload the most recent audited financial statements and AFRs when they are submitted to CPB.

WGPU management said that the omission may have been due to migrating their website to a new platform that was not yet live, and the former platform did not have updated information although it was the current live website.¹³ Station management did not

¹³ Station officials informed us that leading up to the station's go live date on January 14, 2025, any updates needed on the WGPU main page had to be done twice, once on the new platform and also on its old main page platform. This happened to include updates to WGPU's site for FY 2024 audited financials and the 2024 AFR's, among other items. After the station's go live trial crashed due to not having the compatible domain host, an old version of the WGPU main page on the old platform was reinstated. This version of the website must have been from before the updates for the FY 2024 audited financials and FY 24 AFRs were made. However, it still did not include the FY 2023 AFRs.

understand how the FY 2023 AFRs were missing from its website as they send the website team the reports each year.

The station took immediate action to correct the website to ensure the most recent financial records were posted and made available for the public and is now compliant with Act and grant requirements for open financial records.

WGPU was not compliant with Act open financial records requirements on the date of our review and may be subject to penalties under CPB's Non-Compliance Policy.

Recommendations:

We recommend that CPB management require WGPU to:

- 3) fully comply with Act requirements for open meetings and open financial records; and
- 4) identify the corrective actions and controls it has and will implement to ensure future compliance with CPB requirements for Act and General Provisions compliance.

WGPU Management Response:

WGPU management's response to our draft report agreed with our finding that it did not have its most recent AFR and audited financial statement on its website at the time of our review and reiterated the corrective actions it has taken to ensure future compliance. However, although WGPU agreed that it had not provided notice for its advisory council meetings prior to our audit, it provided additional context to explain why it felt that these meetings did not meet all the requirements to be an open meeting subject to notices. WGPU's response further stated that during the audit period, the Advisory Council was in its organizational and planning stages, discussing its roles and responsibilities, and no substantive business was being discussed.

Management did however take corrective action and is now providing notice for the advisory council meetings. Compliance procedures feature multi-level checklists to promote thorough and consistent adherence to regulations. The station's complete written response is presented as Exhibit F.

OIG Review and Comment:

Based on WGPU management's response to our draft audit report, we consider recommendation three resolved but open pending CPB's final management decisions resolving our audit findings and recommendations, and recommendation four unresolved pending CPB's evaluation and acceptance of WGPU's corrective actions. As stated above in the body of the report, we concluded that station business was conducted with the Advisory Council members and WGPU staff, and the meetings should be subject to open meetings requirements and advance notice.

Exhibit A

CPB Payments to WGCU TV/FM

Grants	FY 2023	FY 2024	Totals
Television Community Service Grants (CSG) & Supplemental Grants			
CSG	\$1,164,246	\$ 1,184,119	\$ 2,348,365
Interconnection	\$ 20,948	\$ 19,471	\$ 40,419
Universal Service Support	\$ 17,747	\$ 19,435	\$ 37,182
Total Community Service Grants Television	\$1,202,941	\$ 1,223,025	\$ 2,425,966
Radio Community Service Grants (CSG) & Supplemental Grants			
Restricted CSG	\$ 52,069	\$ 59,133	\$ 111,202
Unrestricted CSG	\$ 146,742	\$ 165,536	\$ 312,278
Total Community Service Grants Radio	\$ 198,811	\$ 224,669	\$ 423,480
Combined CSGs	\$1,401,752	\$ 1,447,694	\$ 2,849,446
Emergency Hurricane Ian Grant #35394-ISS	\$ 25,290	\$ 0	\$ 25,290
CSGs and Emergency Grant	\$1,427,042	\$ 1,447,694	\$ 2,874,736

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Schedule A
WGCU-TV (1743)
Fort Myers, FL

NFFS Excluded?

If you have an NFFS Exclusion, please click the "NFFS X" button, and enter your NFFS data.



Source of Income

	2023 data	2024 data
1. Amounts provided directly and indirectly by federal government agencies	\$2,000	\$48,087
A. Grants for facilities and other capital purposes	\$0	\$0
B. Department of Education	\$0	\$0
C. Department of Health and Human Services	\$0	\$0
D. National Endowment for the Arts and Humanities	\$2,000	\$45,500
Variance greater than 25%.		
E. National Science Foundation	\$0	\$0
F. Other Federal Funds (specify)	\$0	\$2,587
Description HEERF III	Amount \$2,587	
2. Amounts provided by Public Broadcasting Entities	\$1,237,029	\$1,228,025
A. CPB - Community Service Grants	\$1,164,246	\$1,184,119
B. CPB - all other funds from CPB	\$63,985	\$38,906
Variance greater than 25%.		
C. PBS - all payments except copyright royalties and other pass-through payments. See Guidelines for details.	\$0	\$5,000
D. NPR - all payments except pass-through payments. See Guidelines for details.	\$0	\$0
E. Public broadcasting stations - all payments	\$8,798	\$0
Variance greater than 25%.		
F. Other PBE funds (specify)	\$0	\$0
3. Local boards and departments of education or other local government or agency sources	\$15,500	\$20,445
3.1 NFFS Eligible	\$15,500	\$20,445
Variance greater than 25%.		
A. Program and production underwriting	\$15,500	\$20,445
Variance greater than 25%.		
B. Grants and contributions other than underwriting	\$0	\$0

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C. Appropriations from the licensee	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
F. Other income eligible as NFFS (specify)	\$0	\$0
3.2 NFFS Ineligible	\$0	\$0
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$0
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$0
4. State boards and departments of education or other state government or agency sources	\$389,125	\$371,480
4.1 NFFS Eligible	\$389,125	\$371,480
A. Program and production underwriting	\$18,725	\$1,080
Variance greater than 25%.		
B. Grants and contributions other than underwriting	\$370,400	\$370,400
C. Appropriations from the licensee	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
F. Other income eligible as NFFS (specify)	\$0	\$0
4.2 NFFS Ineligible	\$0	\$0
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$0
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$0
5. State colleges and universities	\$488,310	\$462,317
5.1 NFFS Eligible	\$488,310	\$450,251
A. Program and production underwriting	\$2,670	\$0
Variance greater than 25%.		

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B. Grants and contributions other than underwriting	\$0	\$0
C. Appropriations from the licensee	\$485,640	\$450,251
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
F. Other income eligible as NFFS (specify)	\$0	\$0
5.2 NFFS Ineligible	\$0	\$12,066
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$7,800
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$4,266
Description	Amount	
Underwriting from State Universities with Public Media Stations	\$4,266	
6. Other state-supported colleges and universities	\$0	\$0
6.1 NFFS Eligible	\$0	\$0
A. Program and production underwriting	\$0	\$0
B. Grants and contributions other than underwriting	\$0	\$0
C. Appropriations from the licensee	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
F. Other income eligible as NFFS (specify)	\$0	\$0
6.2 NFFS Ineligible	\$0	\$0
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$0
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$0
7. Private colleges and universities	\$0	\$0
7.1 NFFS Eligible	\$0	\$0
A. Program and production underwriting	\$0	\$0
B. Grants and contributions other than underwriting	\$0	\$0

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C. Appropriations from the licensee	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
F. Other income eligible as NFFS (specify)	\$0	\$0
7.2 NFFS Ineligible	\$0	\$0
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$0
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$0
8. Foundations and nonprofit associations	\$133,353	\$149,088
8.1 NFFS Eligible	\$133,353	\$148,908
A. Program and production underwriting	\$133,353	\$148,908
B. Grants and contributions other than underwriting	\$0	\$0
C. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
D. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
E. Other income eligible as NFFS (specify)	\$0	\$0
8.2 NFFS Ineligible	\$0	\$180
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$0
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$180
Description DVD Sales	Amount \$180	
9. Business and Industry	\$200,885	\$223,126
9.1 NFFS Eligible	\$175,885	\$204,127
A. Program and production underwriting	\$175,885	\$204,127
B. Grants and contributions other than underwriting	\$0	\$0
C. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
D. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0

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E. Other income eligible as NFFS (specify)	\$0	\$0
9.2 NFFS Ineligible	\$25,000	\$18,999
A. Rental income	\$4,712	\$8,331
Variance greater than 25%.		
B. Fees for services	\$10,700	\$1,200
Variance greater than 25%.		
C. Licensing fees (not royalties – see instructions for Line 15)	\$9,588	\$9,468
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$0
10. Memberships and subscriptions (net of membership bad debt expense)	\$1,346,019	\$1,535,930
10.1 NFFS Exclusion – Fair market value of premiums that are not of insubstantial value	\$131,710	\$145,257
10.2 NFFS Exclusion – All bad debt expenses from NFFS eligible revenues including but not limited to pledges, underwriting, and membership (unless netted elsewhere in Schedule A)	\$0	\$0
	2023 data	2024 data
10.3 Total number of contributors.	12,002	13,471
11. Revenue from Friends groups less any revenue included on line 10	\$0	\$0
	2023 data	2024 data
11.1 Total number of Friends contributors.	0	0
12. Subsidiaries and other activities unrelated to public broadcasting (See instructions)	\$0	\$0
A. Nonprofit subsidiaries involved in telecommunications activities	\$0	\$0
B. NFFS Ineligible – Nonprofit subsidiaries not involved in telecommunications activities	\$0	\$0
C. NFFS Ineligible – For-profit subsidiaries regardless of the nature of its activities	\$0	\$0
D. NFFS Ineligible – Other activities unrelated to public broadcasting	\$0	\$0
Form of Revenue	2023 data	2024 data
13. Auction revenue (see instructions for Line 13)	\$0	\$0
A. Gross auction revenue	\$0	\$0
B. Direct auction expenses	\$0	\$0
14. Special fundraising activities (see instructions for Line 14)	\$80,137	\$65,614
A. Gross special fundraising revenues	\$94,627	\$68,764
Variance greater than 25%.		
B. Direct special fundraising expenses	\$14,490	\$3,150

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Variance greater than 25%.

15. Passive income	\$57,227	\$132,429
A. Interest and dividends (other than on endowment funds)	\$57,227	\$132,429

Variance greater than 25%.

B. Royalties	\$0	\$0
C. PBS or NPR pass-through copyright royalties	\$0	\$0
16. Gains and losses on investments, charitable trusts and gift annuities and sale of other assets (other than endowment funds)	\$78,132	\$245,774
A. Gains from sales of property and equipment (do not report losses)	\$0	\$0
B. Realized gains/losses on investments (other than endowment funds)	\$90	\$68
C. Unrealized gains/losses on investments and actuarial gains/losses on charitable trusts and gift annuities (other than endowment funds)	\$78,042	\$245,706

Variance greater than 25%.

17. Endowment revenue	\$210,502	\$3,736,534
A. Contributions to endowment principal	\$512	\$3,000,000

Variance greater than 25%.

B. Interest and dividends on endowment funds	\$0	\$0
C. Realized net investment gains and losses on endowment funds (if this is a negative amount, add a hyphen, e.g., "-1,765")	\$0	\$0
D. Unrealized net investment gains and losses on endowment funds (if this is a negative amount, add a hyphen, e.g., "-1,765")	\$209,990	\$736,534

Variance greater than 25%.

18. Capital fund contributions from individuals (see instructions)	\$0	\$0
A. Facilities and equipment (except funds received from federal or public broadcasting sources)	\$0	\$0
B. Other	\$0	\$0

19. Gifts and bequests from major individual donors	\$1,509,890	\$1,219,362
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	2023 data	2024 data
19.1 Total number of major individual donors	230	231

20. Other Direct Revenue	\$75,520	\$65,178
Description	Amount	
Digital Advertising	\$59,301	
Exclusion Description	Amount	
Revenue from non-broadcast activities that fail to meet exception criteria	\$59,301	
Shipping of Premiums	\$5,305	

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Description		Amount	
Exclusion Description	Amount		
Sale of premiums	\$5,305		
Sale of Premiums		\$513	
Exclusion Description	Amount		
Sale of premiums	\$513		
Prior Year Refund		\$157	
Exclusion Description	Amount		
Refunds, rebates, reimbursements and insurance proceeds	\$157		
Immaterial Accounting error found after audit completion		\$-98	
Exclusion Description	Amount		
Immaterial Accounting error found after audit completion	\$-98		
Line 21. Proceeds from the FCC Spectrum Incentive Auction, interest and dividends earned on these funds, channel sharing revenues, and spectrum leases			
		\$217,587	\$217,971
A. Proceeds from sale in spectrum auction		\$0	\$0
B. Interest and dividends earned on spectrum auction related revenue		\$0	\$0
C. Payments from spectrum auction speculators		\$0	\$0
D. Channel sharing and spectrum leases revenues		\$217,587	\$217,971
E. Spectrum repacking funds		\$0	\$0
22. Total Revenue (Sum of lines 1 through 12, 13.A, 14.A, and 15 through 21)		\$6,055,706	\$9,724,510
Variance greater than 25%.			
Adjustments to Revenue			
23. Federal revenue from line 1.		2023 data	2024 data
		\$2,000	\$48,087
Variance greater than 25%.			
24. Public broadcasting revenue from line 2.		\$1,237,029	\$1,228,025
25. Capital funds exclusion—TV (3.2D, 4.2D, 5.2D, 6.2D, 7.2D, 8.2D, 9.2D, 18A)		\$0	\$0
26. Revenue on line 20 not meeting the source, form, purpose, or recipient criteria		\$75,520	\$65,178
27. Other automatic subtractions from total revenue		\$676,909	\$1,379,931
A. Auction expenses – limited to the lesser of lines 13a or 13b		\$0	\$0
B. Special fundraising event expenses – limited to the lesser of lines 14a or 14b		\$14,490	\$3,150
Variance greater than 25%.			

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C. Gains from sales of property and equipment – line 16a	\$0	\$0
D. Realized gains/losses on investments (other than endowment funds) – line 16b	\$90	\$68
E. Unrealized investment and actuarial gains/losses (other than endowment funds) – line 16c	\$78,042	\$245,706
Variance greater than 25%.		
F. Realized and unrealized net investment gains/losses on endowment funds – line 17c, line 17d	\$209,990	\$736,534
Variance greater than 25%.		
G. Rental income (3.2A, 4.2A, 5.2A, 6.2A, 7.2A, 8.2A, 9.2A)	\$4,712	\$8,331
Variance greater than 25%.		
H. Fees for services (3.2B, 4.2B, 5.2B, 6.2B, 7.2B, 8.2B, 9.2B)	\$10,700	\$9,000
I. Licensing Fees (3.2C, 4.2C, 5.2C, 6.2C, 7.2C, 8.2C, 9.2C)	\$9,588	\$9,468
J. Other revenue ineligible as NFFS (3.2E, 4.2E, 5.2E, 6.2E, 7.2E, 8.2E, 9.2E)	\$0	\$4,446
K. FMV of high-end premiums (Line 10.1)	\$131,710	\$145,257
L. All bad debt expenses from NFFS eligible revenues including but not limited to pledges, underwriting, and membership (Line 10.2)	\$0	\$0
M. Revenue from subsidiaries and other activities ineligible as NFFS (12.B, 12.C, 12.D)	\$0	\$0
N. Proceeds from spectrum auction and related revenues from line 21.	\$217,587	\$217,971
28. Total Direct Nonfederal Financial Support (Line 22 less Lines 23 through 27). (Forwards to line 1 of the Summary of Nonfederal Financial Support)	\$4,064,248	\$7,003,289
Variance greater than 25%.		

Comments

Comment	Name	Date	Status
Pass through HEERF III funding provided to Licensee FGCU and deposited to WGCU accounts	Cassondra Harrison	11/25/2024	Comment for CPB
PBS Native America Grant \$5,000	Cassondra Harrison	11/25/2024	Comment for CPB
\$19,435 USSG \$19,471 Interconnect	Cassondra Harrison	11/25/2024	Comment for CPB
\$1,184,119 FY24 CPB CSG grant	Cassondra Harrison	11/25/2024	Comment for CPB
Increase due to WGCU 5 year strategic plan to increase underwriting revenues.	Cassondra Harrison	11/25/2024	Comment for CPB
\$370,400 Florida DOE grant	Cassondra Harrison	11/25/2024	Comment for CPB
Significant decrease due to the ending of the Florida Department of Health	Cassondra Harrison	11/25/2024	Comment for CPB

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Comment	Name	Date	Status
contract ending and was not renewed.			
\$450,251 Salaries Appropriations from university	Cassandra Harrison	11/25/2024	Comment for CPB
Studio Services provided to FGCU	Cassandra Harrison	11/25/2024	Comment for CPB
Underwriting revenue from university that holds the license to a public media station USF/WUSF	Cassandra Harrison	11/25/2024	Comment for CPB
Increase due to WGPU 5 year strategic plan to increase underwriting revenues.	Cassandra Harrison	11/25/2024	Comment for CPB
Increase due to WGPU 5 year strategic plan to increase underwriting revenues.	Cassandra Harrison	11/25/2024	Comment for CPB
Increase due to 3 days of rental of studio to local news station.	Cassandra Harrison	11/25/2024	Comment for CPB
Prior fiscal year revenue was high due to production services provided to other stations during Hurricane Ian	Cassandra Harrison	11/25/2024	Comment for CPB
Google Royalties for Youtube	Cassandra Harrison	11/25/2024	Comment for CPB
Increase due to WGPU 5 year strategic plan to raise revenues. Raising Membership and contributions is one of the key pillars of the plan.	Cassandra Harrison	11/25/2024	Comment for CPB
Increase due to WGPU 5 year strategic plan to raise revenues and member count. Raising Membership and contributions is one of the key pillars of the plan.	Cassandra Harrison	11/25/2024	Comment for CPB
\$53,764 car donation \$10,000 Arthrex 2024 \$5,000 Allegritti Foundation 2024	Cassandra Harrison	11/25/2024	Comment for CPB
Expenses for Allegritti 2024	Cassandra Harrison	11/25/2024	Comment for CPB
Increase in interest and dividends earned due to holding higher cash reserves in our account to accrue interest.	Cassandra Harrison	11/25/2024	Comment for CPB
Increased due to the market/economy and from higher balances in our operating investment accounts	Cassandra Harrison	11/25/2024	Comment for CPB
We received a 1 time estate gift for \$3,000,000 from Myra Daniels to establish a new endowment for the Arts at WGPU	Cassandra Harrison	11/25/2024	Comment for CPB
Significant increase in gains due to the market doing well and due to a \$3,000,000	Cassandra Harrison	11/25/2024	Comment for CPB

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Comment	Name	Date	Status
contribution to start a new endowment at WGPU.			
Decrease due to several one time donations provided in the previous fiscal year.	Cassandra Harrison	11/25/2024	Comment for CPB
Reflections of a colored girl grant from the National Endowment for the Humanities \$45,500	Cassandra Harrison	11/25/2024	Comment for CPB
No bad debt expense in FY24	Cassandra Harrison	12/2/2024	Comment for CPB

Schedule B WorkSheet
WGPU-TV (1743)
Fort Myers, FL

	2023	2024
Step 1 - Compute the Rate - Licensee Indirect Costs/Licensee Direct Costs		
Institutional Support (Enter this amount here only if station benefits from Institutional Support.)	\$59,172,482	\$48,063,963
AFS page or "n/a"	55	52
Physical Plant Support (Enter this amount here only if station benefits from Physical Plant Support.)	\$13,273,276	\$14,977,725
AFS page or "n/a"	55	52
Licensee Indirect Costs	\$72,445,758	\$63,041,688
Licensee Direct Costs		
Total Operating expenses	\$318,028,284	\$324,570,103
AFS page or "n/a"	55	52
Less: Institutional Support (Enter this amount whether or not the station benefits from Institutional Support.)	\$59,172,482	\$48,063,963
AFS page or "n/a"	55	52
Less: Physical Plant Support (Enter this amount whether or not the station benefits from Physical Plant Support.)	\$13,273,276	\$14,977,725
AFS page or "n/a"	55	52
Licensee's Direct Costs (= Total operating expenses minus both Institutional Support and Physical Plant Support)	\$245,582,526	\$261,528,415
Indirect Cost Rate = (Licensee's Indirect Costs/Licensee's Direct Costs)	%29.499557	%24.105101
Step 2 - Identify the Base (Station's Net Direct Expenses)		
Station's Total Operating Expenses (from Schedule E, Line 8)	\$6,484,135	\$6,349,594
Less: Depreciation and Amortization - from station's AFS (if applicable)	\$376,719	\$382,311

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	2023	2024
AFS page or "n/a"	18	19
In-kind contributions and donated property and equipment reported as expenses per AFS (if applicable)	\$121,669	\$52,483
Variance greater than 25%.		
AFS page or "n/a"	21	22
Indirect Administrative Support (if included in station's total expenses) - per AFS	\$1,340,138	\$1,111,465
AFS page or "n/a"	21	22
Expenses for non-broadcast activities and UBIT-per AFS (if applicable)	\$26,977	\$105,772
Variance greater than 25%.		
AFS page or "n/a"	na	14
Expenses not supported by licensee - per AFS (Example: expenses of consolidated entities like Friends Groups, foundations, and component units (if applicable))	\$0	\$0
AFS page or "n/a"	na	na
Station's Net Direct Expenses	\$4,618,632	\$4,697,563
Step 3: Apply the Rate to the Base (= total support activity benefiting the station)	\$1,362,476	\$1,132,352
Upload the licensee's audited financial statement only. [NOTE: Only PDF files are allowed for upload.]	View Document	1743_WGCU_BWA_fy24.pdf

Comments

Comment	Name	Date	Status
Occupancy List WGCU-TV (1743) Fort Myers, FL			
	Type of Occupancy	Location	Value
	Land	S.R. 31	7,000

Annual Value Appraisal for Land Associated with Tower Facilities

Questions	Value
1. Land Area (in acres) Restricted to FCC requirements for the facility, unless local zoning requires additional land, in which case, the larger area may be used	Acres 14.14
2. Unit Value per acre Appraisals should include facts concerning, and analysis of, land-sale comparables. To arrive at a unit value per acre use community zoning laws or local codes for the property in question and base it on vacant lot value.	\$ 7072.14

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Type of Occupancy Questions	Location	Value
3. Land value (product of lines 1 and 2)		\$ 100000.0596
4. Rate of return on the land		% 7
5. Annual value before deductions (product of lines 3 and 4)		\$ 7000.004172
6. Payments made to landowner as part of a lease or rental agreement		\$ 0
7. Payments received from others as part of a sublease or rental agreement		\$ 0
8. Annual value for NFFS purposes (line 5 less lines 6 and 7)		\$ 7000.004172
<p>I certify that the annual value is correct to the best of my knowledge and belief; that I have no interest, present or contemplated, in subject property or in any of the principals involved; that my compensation is in no way contingent upon the values stated; that I personally inspected the property; that no important facts have intentionally been withheld or overlooked; and that this appraisal conforms to the standards of practice and code of ethics recognized by the appraisal profession.</p>		
Name of Appraiser Gerald A. Hendry	Appraiser Designation MAI, CCIM RZ2245	Date 04/30/2020

Schedule B Totals
WGPU-TV (1743)
Fort Myers, FL

	2023 data	2024 data
1. Total support activity benefiting station	\$1,362,476	\$1,132,352
2. Occupancy value	7,000	\$7,000
3. Deductions: Fees paid to the licensee for overhead recovery, assessment, etc.	\$29,337	\$27,887
4. Deductions: Support shown on lines 1 and 2 in excess of revenue reported in financial statements.	\$0	\$0
5. Total Indirect Administrative Support (Forwards to Line 2 of the Summary of Nonfederal Financial Support)	\$1,340,139	\$1,111,465
6. Please enter an institutional type code for your licensee.	SU	SU

Comments

Comment	Name	Date	Status
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Schedule C
WGPU-TV (1743)
Fort Myers, FL

	2023 data	Donor Code	2024 data
1. PROFESSIONAL SERVICES (must be eligible as NFFS)	\$9,300		\$2,600
A. Legal	\$0		\$0
B. Accounting and/or auditing	BS \$9,300	BS	\$2,600
C. Engineering	\$0		\$0
D. Other professionals (see specific line item instructions in Guidelines before completing)	\$0		\$0
2. GENERAL OPERATIONAL SERVICES (must be eligible as NFFS)	\$0		\$0

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	2023 data	Donor Code	2024 data
A. Annual rental value of space (studios, offices, or tower facilities)	\$0		\$0
B. Annual value of land used for locating a station-owned transmission tower	\$0		\$0
C. Station operating expenses	\$0		\$0
D. Other (see specific line item instructions in Guidelines before completing)	\$0		\$0
3. OTHER SERVICES (must be eligible as NFFS)	\$112,369		\$49,883
A. ITV or educational radio	\$0		\$0
B. State public broadcasting agencies	SG \$43,116	SG	\$19,891
C. Local advertising	BS \$69,253	BS	\$29,992
D. National advertising	\$0		\$0
4. Total in-kind contributions - services and other assets eligible as NFFS (sum of lines 1 through 3), forwards to Line 3a. of the Summary of Nonfederal Financial Support	\$121,669		\$52,483
Variance greater than 25%.			
5. IN-KIND CONTRIBUTIONS INELIGIBLE AS NFFS	\$0		\$0
A. Compact discs, records, tapes and cassettes	\$0		\$0
B. Exchange transactions	\$0		\$0
C. Federal or public broadcasting sources	\$0		\$0
D. Fundraising related activities	\$0		\$0
E. ITV or educational radio outside the allowable scope of approved activities	\$0		\$0
F. Local productions	\$0		\$0
G. Program supplements	\$0		\$0
H. Programs that are nationally distributed	\$0		\$0
I. Promotional items	\$0		\$0
J. Regional organization allocations of program services	\$0		\$0
K. State PB agency allocations other than those allowed on line 3(b)	\$0		\$0
L. Services that would not need to be purchased if not donated	\$0		\$0
M. Other	\$0		\$0
6. Total in-kind contributions - services and other assets (line 4 plus line 5), forwards to Schedule F, line 1c. Must agree with in-kind contributions recognized as revenue in the AFS.	\$121,669		\$52,483

Variance greater than 25%.

Comments

Comment	Name	Date	Status
In Kind from JM&CO auditors	Cassandra Harrison	11/25/2024	Comment for CPB

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Comment	Name	Date	Status
In Kind from Florida Department of Education	Cassandra Harrison	11/25/2024	Comment for CPB

Schedule D
WGCU-TV (1743)
Fort Myers, FL

	2023 data	Donor Code	2024 data
1. Land (must be eligible as NFFS)	\$		\$0
2. Building (must be eligible as NFFS)	\$		\$0
3. Equipment (must be eligible as NFFS)	\$		\$0
4. Vehicle(s) (must be eligible as NFFS)	\$		\$0
5. Other (specify) (must be eligible as NFFS)	\$		\$0
6. Total in-kind contributions - property and equipment eligible as NFFS (sum of lines 1 through 5), forwards to Line 3b. of the Summary of Nonfederal Financial Support	\$		\$0
7. IN-KIND CONTRIBUTIONS INELIGIBLE AS NFFS	\$		\$0
a) Exchange transactions	\$		\$0
b) Federal or public broadcasting sources	\$		\$0
c) TV only—property and equipment that includes new facilities (land and structures), expansion of existing facilities and acquisition of new equipment	\$		\$0
d) Other (specify)	\$		\$0
8. Total in-kind contributions - property and equipment (line 6 plus line 7), forwards to Schedule F, line 1d. Must agree with in-kind contributions recognized as revenue in the AFS.	\$		\$0

Comments

Comment	Name	Date	Status
Schedule E WGCU-TV (1743) Fort Myers, FL			

EXPENSES
(Operating and non-operating)

PROGRAM SERVICES

	2023 data	2024 data
1. Programming and production	\$2,723,087	\$2,744,253
A. TV CSG	\$1,019,319	\$677,802
B. TV Interconnection	\$20,948	\$19,471
C. Other CPB Funds	\$21,803	\$19,435
D. All non-CPB Funds	\$1,661,017	\$2,027,545
2. Broadcasting and engineering	\$848,606	\$911,511
A. TV CSG	\$54,722	\$165,389
B. TV Interconnection	\$0	\$0
C. Other CPB Funds	\$20,089	\$0

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	2023 data	2024 data
D. All non-CPB Funds	\$773,795	\$746,122
3. Program information and promotion	\$383,560	\$377,066
A. TV CSG	\$145,836	\$73,329
B. TV Interconnection	\$0	\$0
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$237,724	\$303,737
SUPPORT SERVICES		
	2023 data	2024 data
4. Management and general	\$982,767	\$934,965
A. TV CSG	\$41,078	\$37,879
B. TV Interconnection	\$0	\$0
C. Other CPB Funds	\$1,145	\$0
D. All non-CPB Funds	\$940,544	\$897,086
5. Fund raising and membership development	\$901,558	\$999,772
A. TV CSG	\$185,092	\$155,248
B. TV Interconnection	\$0	\$0
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$716,466	\$844,524
6. Underwriting and grant solicitation	\$644,557	\$382,027
A. TV CSG	\$110,217	\$74,472
B. TV Interconnection	\$0	\$0
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$534,340	\$307,555
7. Depreciation and amortization (if not allocated to functional categories in lines 1 through 6)	\$0	\$0
A. TV CSG	\$0	\$0
B. TV Interconnection	\$0	\$0
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$0	\$0
8. Total Expenses (sum of lines 1 to 7) must agree with audited financial statements	\$6,484,135	\$6,349,594
A. Total TV CSG (sum of Lines 1.A, 2.A, 3.A, 4.A, 5.A, 6.A, 7.A)	\$1,556,264	\$1,184,119
B. Total TV Interconnection (sum of Lines 1.B, 2.B, 3.B, 4.B, 5.B, 6.B, 7.B)	\$20,948	\$19,471
C. Total Other CPB Funds (sum of Lines 1.C, 2.C, 3.C, 4.C, 5.C, 6.C, 7.C)	\$43,037	\$19,435

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	2023 data	2024 data
D. Total All non-CPB Funds (sum of Lines 1.D, 2.D, 3.D, 4.D, 5.D, 6.D, 7.D)	\$4,863,886	\$5,126,569

INVESTMENT IN CAPITAL ASSETS

Cost of capital assets purchased or donated

	2023 data	2024 data
9. Total capital assets purchased or donated	\$0	\$38,437
9a. Land and buildings	\$0	\$0
9b. Equipment	\$0	\$38,437
9c. All other	\$0	\$0
10. Total expenses and investment in capital assets (Sum of lines 8 and 9)	\$6,484,135	\$6,388,031

Additional Information

(Lines 11 + 12 must equal line 8 and Lines 13 + 14 must equal line 9)

	2023 data	2024 data
11. Total expenses (direct only)	\$5,022,328	\$5,185,646
12. Total expenses (indirect and in-kind)	\$1,461,807	\$1,163,948
13. Investment in capital assets (direct only)	\$0	\$38,437
14. Investment in capital assets (indirect and in-kind)	\$0	\$0

Comments

Comment	Name	Date	Status
\$564,508 FY24 CSG Programming \$113,293.74 FY24 CSG Salaries	Cassandra Harrison	11/25/2024	Comment for CPB
\$19471 Programming FY24 Interconnect	Cassandra Harrison	11/25/2024	Comment for CPB
\$19435 Programming FY24 USSG	Cassandra Harrison	11/25/2024	Comment for CPB
\$165,389.21 FY24 CSG Salaries	Cassandra Harrison	11/25/2024	Comment for CPB
\$73,329.25 FY24 CSG Salaries	Cassandra Harrison	11/25/2024	Comment for CPB
\$37,878.55 FY24 CSG Salaries	Cassandra Harrison	11/25/2024	Comment for CPB
\$155,247.93 FY24 CSG Salaries	Cassandra Harrison	11/25/2024	Comment for CPB
\$74,472.32 FY24 CSG Salaries	Cassandra Harrison	11/25/2024	Comment for CPB
Purchase of an additional new WGPU TV Production Vehicle	Cassandra Harrison	11/25/2024	Comment for CPB

Schedule F
WGPU-TV (1743)
Fort Myers, FL

Note:This grantee is joined with [WGPU-FM](#)

WVCU-TV Annual Financial Report
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2024 data

1. Data from AFR

a. Schedule A, Line 22	\$14,271,743
b. Schedule B, Line 5	\$1,892,451
c. Schedule C, Line 6	\$132,625
d. Schedule D, Line 8	\$0
e. Total from AFR	\$16,296,819

Choose Reporting Model

You **must** choose one of the three reporting models in order to complete Schedule F. After making your selection, click the "Choose" button below, which will display your reporting model. When changing to a different reporting model all data entered in the current reporting model will be lost.

☐ FASB ☒ GASB Model A proprietary enterprise-fund financial statements with business-type activities only ☐ GASB Model B public broadcasting entity-wide statements with mixed governmental and business-type activities

2024 data

2. GASB Model A proprietary enterprise-fund financial statements with business-type activities only

a. Operating revenues	\$12,112,423
b. Non-operating revenues	\$4,184,396
c. Other revenue	\$0
d. Capital grants, gifts and appropriations (if not included above)	\$0
e. Total From AFS, lines 2a-2d	\$16,296,819

Reconciliation

2024 data

3. Difference (line 1 minus line 2)	\$0
4. If the amount on line 3 is not equal to \$0, click the "Add" button and list the reconciling items.	\$0

Comments

Comment	Name	Date	Status
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**WGPU-FM Annual Financial Report
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Schedule A
WGPU-FM (1344)
Fort Myers, FL

NFFS Excluded?

If you have an NFFS Exclusion, please click the "NFFS X" button, and enter your NFFS data.



Source of Income

	2023 data	2024 data
1. Amounts provided directly and indirectly by federal government agencies	\$0	\$412
A. Grants for facilities and other capital purposes	\$0	\$0
B. Department of Education	\$0	\$0
C. Department of Health and Human Services	\$0	\$0
D. National Endowment for the Arts and Humanities	\$0	\$0
E. National Science Foundation	\$0	\$0
F. Other Federal Funds (specify)	\$0	\$412
Description HEERF III	Amount \$412	
2. Amounts provided by Public Broadcasting Entities	\$198,811	\$235,256
A. CPB - Community Service Grants	\$198,811	\$224,669
B. CPB - all other funds from CPB	\$0	\$0
C. PBS - all payments except copyright royalties and other pass-through payments. See Guidelines for details.	\$0	\$0
D. NPR - all payments except pass-through payments. See Guidelines for details.	\$0	\$10,587
E. Public broadcasting stations - all payments	\$0	\$0
F. Other PBE funds (specify)	\$0	\$0
3. Local boards and departments of education or other local government or agency sources	\$36,275	\$45,955
3.1 NFFS Eligible	\$36,275	\$45,955
Variance greater than 25%.		
A. Program and production underwriting	\$36,275	\$45,955
Variance greater than 25%.		
B. Grants and contributions other than underwriting	\$0	\$0
C. Appropriations from the licensee	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
F. Other income eligible as NFFS (specify)	\$0	\$0

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3.2 NFFS Ineligible	\$0	\$0
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$0
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$0
4. State boards and departments of education or other state government or agency sources	\$146,220	\$147,117
4.1 NFFS Eligible	\$146,220	\$147,117
A. Program and production underwriting	\$46,220	\$47,117
B. Grants and contributions other than underwriting	\$100,000	\$100,000
C. Appropriations from the licensee	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
F. Other income eligible as NFFS (specify)	\$0	\$0
4.2 NFFS Ineligible	\$0	\$0
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$0
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$0
5. State colleges and universities	\$299,793	\$359,530
5.1 NFFS Eligible	\$287,354	\$318,155
A. Program and production underwriting	\$51,988	\$21,856
Variance greater than 25%.		
B. Grants and contributions other than underwriting	\$0	\$0
C. Appropriations from the licensee	\$235,366	\$296,299
Variance greater than 25%.		
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0

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F. Other income eligible as NFFS (specify)	\$0	\$0
5.2 NFFS Ineligible	\$12,439	\$41,375
Variance greater than 25%.		
A. Rental income	\$0	\$3,225
B. Fees for services	\$100	\$0
Variance greater than 25%.		
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$12,339	\$38,150
Description	Amount	
Underwriting from State Universities with Public Media Stations	\$38,150	
Variance greater than 25%.		
6. Other state-supported colleges and universities	\$0	\$0
6.1 NFFS Eligible	\$0	\$0
A. Program and production underwriting	\$0	\$0
B. Grants and contributions other than underwriting	\$0	\$0
C. Appropriations from the licensee	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
F. Other income eligible as NFFS (specify)	\$0	\$0
6.2 NFFS Ineligible	\$0	\$0
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$0
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$0
7. Private colleges and universities	\$9,860	\$16,974
7.1 NFFS Eligible	\$9,860	\$16,974
Variance greater than 25%.		

WGCU-FM Annual Financial Report For the Fiscal Years Ending June 30, 2023 and 2024		
A. Program and production underwriting	\$9,860	\$16,974
Variance greater than 25%.		
B. Grants and contributions other than underwriting	\$0	\$0
C. Appropriations from the licensee	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
E. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
F. Other income eligible as NFFS (specify)	\$0	\$0
7.2 NFFS Ineligible	\$0	\$0
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$0
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$0
8. Foundations and nonprofit associations	\$261,398	\$290,115
8.1 NFFS Eligible	\$261,398	\$289,880
A. Program and production underwriting	\$181,398	\$255,880
Variance greater than 25%.		
B. Grants and contributions other than underwriting	\$80,000	\$34,000
Variance greater than 25%.		
C. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
D. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
E. Other income eligible as NFFS (specify)	\$0	\$0
8.2 NFFS Ineligible	\$0	\$235
A. Rental income	\$0	\$0
B. Fees for services	\$0	\$235
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$0
9. Business and Industry	\$343,853	\$294,113

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9.1 NFFS Eligible	\$343,853	\$293,896
A. Program and production underwriting	\$343,853	\$293,896
B. Grants and contributions other than underwriting	\$0	\$0
C. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (Radio only)	\$0	\$0
D. Gifts and grants received through a capital campaign but not for facilities and equipment	\$0	\$0
E. Other income eligible as NFFS (specify)	\$0	\$0
9.2 NFFS Ineligible	\$0	\$217
A. Rental income	\$0	\$150
B. Fees for services	\$0	\$0
C. Licensing fees (not royalties – see instructions for Line 15)	\$0	\$0
D. Gifts and grants for facilities and equipment as restricted by the donor or received through a capital campaign (TV only)	\$0	\$0
E. Other income ineligible for NFFS inclusion	\$0	\$67
Description Prior Year Refund	Amount \$67	
10. Memberships and subscriptions (net of membership bad debt expense)	\$719,356	\$801,020
10.1 NFFS Exclusion – Fair market value of premiums that are not of insubstantial value	\$10,133	\$21,028
Variance greater than 25%.		
10.2 NFFS Exclusion – All bad debt expenses from NFFS eligible revenues including but not limited to pledges, underwriting, and membership (unless netted elsewhere in Schedule A)	\$0	\$0
	<u>2023 data</u>	<u>2024 data</u>
10.3 Total number of contributors.	5,130	5,722
11. Revenue from Friends groups less any revenue included on line 10	\$0	\$0
	<u>2023 data</u>	<u>2024 data</u>
11.1 Total number of Friends contributors.	0	0
12. Subsidiaries and other activities unrelated to public broadcasting (See instructions)	\$0	\$0
A. Nonprofit subsidiaries involved in telecommunications activities	\$0	\$0
B. NFFS Ineligible – Nonprofit subsidiaries not involved in telecommunications activities	\$0	\$0
C. NFFS Ineligible – For-profit subsidiaries regardless of the nature of its activities	\$0	\$0
D. NFFS Ineligible – Other activities unrelated to public broadcasting	\$0	\$0
Form of Revenue	<u>2023 data</u>	<u>2024 data</u>
13. Auction revenue (see instructions for Line 13)	\$0	\$0
A. Gross auction revenue	\$0	\$0
B. Direct auction expenses	\$0	\$0

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14. Special fundraising activities (see instructions for Line 14)		\$28,254	\$34,559
A. Gross special fundraising revenues		\$28,254	\$34,559
B. Direct special fundraising expenses		\$0	\$0
15. Passive income		\$23,382	\$50,727
A. Interest and dividends (other than on endowment funds)		\$23,382	\$50,727
Variance greater than 25%.			
B. Royalties		\$0	\$0
C. PBS or NPR pass-through copyright royalties		\$0	\$0
16. Gains and losses on investments, charitable trusts and gift annuities and sale of other assets (other than endowment funds)		\$8,560	\$17,210
A. Gains from sales of property and equipment (do not report losses)		\$0	\$0
B. Realized gains/losses on investments (other than endowment funds)		\$-3,133	\$1,305
Variance greater than 25%.			
C. Unrealized gains/losses on investments and actuarial gains/losses on charitable trusts and gift annuities (other than endowment funds)		\$11,693	\$15,905
Variance greater than 25%.			
17. Endowment revenue		\$1,350	\$1,722
A. Contributions to endowment principal		\$0	\$0
B. Interest and dividends on endowment funds		\$0	\$0
C. Realized net investment gains and losses on endowment funds (if this is a negative amount, add a hyphen, e.g., "-1,765")		\$0	\$0
D. Unrealized net investment gains and losses on endowment funds (if this is a negative amount, add a hyphen, e.g., "-1,765")		\$1,350	\$1,722
Variance greater than 25%.			
18. Capital fund contributions from individuals (see instructions)		\$0	\$0
A. Facilities and equipment (except funds received from federal or public broadcasting sources)		\$0	\$0
B. Other		\$0	\$0
19. Gifts and bequests from major individual donors		\$696,554	\$2,248,148
	2023 data	2024 data	
19.1 Total number of major individual donors	223	241	
Variance greater than 25%.			
20. Other Direct Revenue		\$31,438	\$4,375
Description	Amount		
Shipping of Premiums	\$4,373		

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Description	Amount
-------------	--------

Exclusion Description	Amount
Sale of premiums	\$4,373

Rounding difference	\$2
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Exclusion Description	Amount
Rounding difference	\$2

Line 21. Proceeds from the FCC Spectrum Incentive Auction, interest and dividends earned on these funds, channel sharing revenues, and spectrum leases	\$0	\$0
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A. Proceeds from sale in spectrum auction	\$0	\$0
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B. Interest and dividends earned on spectrum auction related revenue	\$0	\$0
--	-----	-----

C. Payments from spectrum auction speculators	\$0	\$0
---	-----	-----

D. Channel sharing and spectrum leases revenues	\$0	\$0
---	-----	-----

E. Spectrum repacking funds	\$0	\$0
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22. Total Revenue (Sum of lines 1 through 12, 13.A, 14.A, and 15 through 21)	\$2,805,104	\$4,547,233
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Variance greater than 25%.

Adjustments to Revenue

	2023 data	2024 data
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23. Federal revenue from line 1.	\$0	\$412
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24. Public broadcasting revenue from line 2.	\$198,811	\$235,256
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25. Capital funds exclusion—TV (3.2D, 4.2D, 5.2D, 6.2D, 7.2D, 8.2D, 9.2D, 18A)	\$0	\$0
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26. Revenue on line 20 not meeting the source, form, purpose, or recipient criteria	\$31,438	\$4,375
---	----------	---------

Variance greater than 25%.

27. Other automatic subtractions from total revenue	\$32,482	\$81,787
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A. Auction expenses – limited to the lesser of lines 13a or 13b	\$0	\$0
---	-----	-----

B. Special fundraising event expenses – limited to the lesser of lines 14a or 14b	\$0	\$0
---	-----	-----

C. Gains from sales of property and equipment – line 16a	\$0	\$0
--	-----	-----

D. Realized gains/losses on investments (other than endowment funds) – line 16b	\$-3,133	\$1,305
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Variance greater than 25%.

E. Unrealized investment and actuarial gains/losses (other than endowment funds) – line 16c	\$11,693	\$15,905
---	----------	----------

Variance greater than 25%.

F. Realized and unrealized net investment gains/losses on endowment funds – line 17c, line 17d	\$1,350	\$1,722
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Variance greater than 25%.

G. Rental income (3.2A, 4.2A, 5.2A, 6.2A, 7.2A, 8.2A, 9.2A)	\$0	\$3,375
H. Fees for services (3.2B, 4.2B, 5.2B, 6.2B, 7.2B, 8.2B, 9.2B)	\$100	\$235

Variance greater than 25%.

I. Licensing Fees (3.2C, 4.2C, 5.2C, 6.2C, 7.2C, 8.2C, 9.2C)	\$0	\$0
J. Other revenue ineligible as NFFS (3.2E, 4.2E, 5.2E, 6.2E, 7.2E, 8.2E, 9.2E)	\$12,339	\$38,217

Variance greater than 25%.

K. FMV of high-end premiums (Line 10.1)	\$10,133	\$21,028
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Variance greater than 25%.

L. All bad debt expenses from NFFS eligible revenues including but not limited to pledges, underwriting, and membership (Line 10.2)	\$0	\$0
M. Revenue from subsidiaries and other activities ineligible as NFFS (12.B, 12.C, 12.D)	\$0	\$0
N. Proceeds from spectrum auction and related revenues from line 21.	\$0	\$0
28. Total Direct Nonfederal Financial Support (Line 22 less Lines 23 through 27). (Forwards to line 1 of the Summary of Nonfederal Financial Support)	\$2,542,373	\$4,225,403

Variance greater than 25%.

Comments

Comment	Name	Date	Status
Car Donation \$34,559	Cassandra Harrison	11/19/2024	Comment for CPB
2023 NPR Distribution Network Donation	Cassandra Harrison	11/22/2024	Comment for CPB
\$165,536 2024 CPB Radio Unrestricted CSG \$59,133 2024 CPB Radio Restricted CSG	Cassandra Harrison	11/22/2024	Comment for CPB
Florida DOE grant	Cassandra Harrison	11/22/2024	Comment for CPB
Pass through HEERF III funding provided to Licensee FGCU and deposited to WGPU accounts	Cassandra Harrison	11/25/2024	Comment for CPB
Increase due to WGPU 5 year strategic plan to increase underwriting revenues.	Cassandra Harrison	11/25/2024	Comment for CPB
Increase due to WGPU 5 year strategic plan to increase underwriting revenues.	Cassandra Harrison	11/25/2024	Comment for CPB
Decreased due to a reduction in contracts with universities without public media stations. Most of our college contracts are	Cassandra Harrison	11/25/2024	Comment for CPB

WGCU-FM Annual Financial Report For the Fiscal Years Ending June 30, 2023 and 2024			
Comment	Name	Date	Status
managed by an agency (Florida Public Media) and we have limited control on how many or which contracts renew.			
This is determined by our university. They increased to help offset the campus wide salary increases they implemented in the summer.	Cassondra Harrison	11/25/2024	Comment for CPB
Increased due to added contracts with universities with Public media Stations. Most of our college contracts are managed by an agency (Florida Public Media) and we have limited control on how many or which contracts renew.	Cassondra Harrison	11/25/2024	Comment for CPB
Rental revenue from FGCU for the studio to assist a class	Cassondra Harrison	11/25/2024	Comment for CPB
Increase due to WGCU 5 year strategic plan to increase underwriting revenues.	Cassondra Harrison	11/25/2024	Comment for CPB
Increase due to WGCU 5 year strategic plan to increase underwriting revenues.	Cassondra Harrison	11/25/2024	Comment for CPB
\$30,000 Contribution from Brico Foundation \$4,000 Contribution Black Foundation	Cassondra Harrison	11/25/2024	Comment for CPB
FM Production Services for recording	Cassondra Harrison	11/25/2024	Comment for CPB
Decreased revenue from agency Florida Public Media clients. WGCU has limited control over FPM new and renewed contracts	Cassondra Harrison	11/25/2024	Comment for CPB
FM Studio rental \$150	Cassondra Harrison	11/25/2024	Comment for CPB
Increased due to the WGCU 5 year strategic campaign to increase revenue. Increased membership is a key pillar in the plan.	Cassondra Harrison	11/25/2024	Comment for CPB
Premiums FMV \$20+	Cassondra Harrison	11/25/2024	Comment for CPB
Increased due to the WGCU 5 year strategic campaign to increase revenue. Increased membership is a key pillar in the plan.	Cassondra Harrison	11/25/2024	Comment for CPB
Increased due to the WGCU 5 year strategic campaign to increase revenue. Increased membership and contributions are a key pillar in the plan. WGCU	Cassondra Harrison	11/25/2024	Comment for CPB

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Comment	Name	Date	Status
also received a one time estate gift during FY24 for \$900,000			
No bad debt expense in FY24	Cassandra Harrison	12/2/2024	Comment for CPB
Schedule B WorkSheet WGCU-FM (1344) Fort Myers, FL			
		2023	2024
Step 1 - Compute the Rate - Licensee Indirect Costs/Licensee Direct Costs			
Institutional Support (Enter this amount here only if station benefits from Institutional Support.)		\$59,172,482	\$48,063,963
AFS page or "n/a"		55	52
Physical Plant Support (Enter this amount here only if station benefits from Physical Plant Support.)		\$13,273,276	\$14,977,725
AFS page or "n/a"		55	52
Licensee Indirect Costs		\$72,445,758	\$63,041,688
Licensee Direct Costs			
Total Operating expenses		\$318,028,284	\$324,570,103
AFS page or "n/a"		55	52
Less: Institutional Support (Enter this amount whether or not the station benefits from Institutional Support.)		\$59,172,482	\$48,063,963
AFS page or "n/a"		55	52
Less: Physical Plant Support (Enter this amount whether or not the station benefits from Physical Plant Support.)		\$13,273,276	\$14,977,725
AFS page or "n/a"		55	52
Licensee's Direct Costs (= Total operating expenses minus both Institutional Support and Physical Plant Support)		\$245,582,526	\$261,528,415
Indirect Cost Rate = (Licensee's Indirect Costs/Licensee's Direct Costs)		%29.499557	%24.105101
Step 2 - Identify the Base (Station's Net Direct Expenses)			
Station's Total Operating Expenses (from Schedule E, Line 8)		\$3,514,024	\$4,198,604
Less: Depreciation and Amortization - from station's AFS (if applicable)		\$33,836	\$33,662
AFS page or "n/a"		18	19
In-kind contributions and donated property and equipment reported as expenses per AFS (if applicable)		\$88,401	\$80,142

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	2023	2024
AFS page or "n/a"	22	23
Indirect Administrative Support (if included in station's total expenses) - per AFS	\$765,199	\$780,986
AFS page or "n/a"	22	23
Expenses for non-broadcast activities and UBIT-per AFS (if applicable)	\$206	\$323
Variance greater than 25%.		
AFS page or "n/a"	14	14
Expenses not supported by licensee - per AFS (Example: expenses of consolidated entities like Friends Groups, foundations, and component units (if applicable))	\$0	\$0
AFS page or "n/a"	na	na
Station's Net Direct Expenses	\$2,626,382	\$3,303,491
Variance greater than 25%.		
Step 3: Apply the Rate to the Base (= total support activity benefiting the station)	\$774,771	\$796,310
Upload the licensee's audited financial statement only. [NOTE: Only PDF files are allowed for upload.]	View Document	1344_WGCU_BWA_fy24.pdf

Comments

Comment	Name	Date	Status
Occupancy List WGCU-FM (1344) Fort Myers, FL			
	Type of Occupancy	Location	Value
	Land	S.R. 31	3,000

Annual Value Appraisal for Land Associated with Tower Facilities

Questions	Value
1. Land Area (in acres) Restricted to FCC requirements for the facility, unless local zoning requires additional land, in which case, the larger area may be used	Acres 14.14
2. Unit Value per acre Appraisals should include facts concerning, and analysis of, land-sale comparables. To arrive at a unit value per acre use community zoning laws or local codes for the property in question and base it on vacant lot value.	\$ 7072.14
3. Land value (product of lines 1 and 2)	\$ 100000.0596
4. Rate of return on the land	% 3

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Type of Occupancy	Location	Value
Questions		Value
5. Annual value before deductions (product of lines 3 and 4)		\$ 3000.001788
6. Payments made to landowner as part of a lease or rental agreement		\$ 0
7. Payments received from others as part of a sublease or rental agreement		\$ 0
8. Annual value for NFFS purposes (line 5 less lines 6 and 7)		\$ 3000.001788
I certify that the annual value is correct to the best of my knowledge and belief; that I have no interest, present or contemplated, in subject property or in any of the principals involved; that my compensation is in no way contingent upon the values stated; that I personally inspected the property; that no important facts have intentionally been withheld or overlooked; and that this appraisal conforms to the standards of practice and code of ethics recognized by the appraisal profession.		
Name of Appraiser	Appraiser Designation	Date
Gerald A. Hendry	MAI, CCIM RZ2245	04/30/2020

Schedule B Totals
WGPU-FM (1344)
Fort Myers, FL

	2023 data	2024 data
1. Total support activity benefiting station	\$774,771	\$796,310
2. Occupancy value	3,000	\$3,000
3. Deductions: Fees paid to the licensee for overhead recovery, assessment, etc.	\$12,573	\$18,324
Variance greater than 25%.		
4. Deductions: Support shown on lines 1 and 2 in excess of revenue reported in financial statements.	\$0	\$0
5. Total Indirect Administrative Support (Forwards to Line 2 of the Summary of Nonfederal Financial Support)	\$765,198	\$780,986
6. Please enter an institutional type code for your licensee.	SU	SU

Comments

Comment	Name	Date	Status
Schedule C WGPU-FM (1344) Fort Myers, FL			

	2023 data	Donor Code	2024 data
1. PROFESSIONAL SERVICES (must be eligible as NFFS)	\$11,300		\$4,100
A. Legal	\$0		\$0
B. Accounting and/or auditing	BS \$11,300	BS	\$4,100
C. Engineering	\$0		\$0
D. Other professionals (see specific line item instructions in Guidelines before completing)	\$0		\$0
2. GENERAL OPERATIONAL SERVICES (must be eligible as NFFS)	\$0		\$0

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	2023 data	Donor Code	2024 data
A. Annual rental value of space (studios, offices, or tower facilities)	\$0		\$0
B. Annual value of land used for locating a station-owned transmission tower	\$0		\$0
C. Station operating expenses	\$0		\$0
D. Other (see specific line item instructions in Guidelines before completing)	\$0		\$0
3. OTHER SERVICES (must be eligible as NFFS)	\$69,301		\$28,585
A. ITV or educational radio	\$0		\$0
B. State public broadcasting agencies	SG \$1,019	SG	\$1,082
C. Local advertising	BS \$68,282	BS	\$27,503
D. National advertising	\$0		\$0
4. Total in-kind contributions - services and other assets eligible as NFFS (sum of lines 1 through 3), forwards to Line 3a. of the Summary of Nonfederal Financial Support	\$80,601		\$32,685
Variance greater than 25%.			
5. IN-KIND CONTRIBUTIONS INELIGIBLE AS NFFS	\$7,800		\$47,457
A. Compact discs, records, tapes and cassettes	\$0		\$0
B. Exchange transactions	\$0		\$0
C. Federal or public broadcasting sources	\$0		\$0
D. Fundraising related activities	BS \$7,800	BS	\$47,457
E. ITV or educational radio outside the allowable scope of approved activities	\$0		\$0
F. Local productions	\$0		\$0
G. Program supplements	\$0		\$0
H. Programs that are nationally distributed	\$0		\$0
I. Promotional items	\$0		\$0
J. Regional organization allocations of program services	\$0		\$0
K. State PB agency allocations other than those allowed on line 3(b)	\$0		\$0
L. Services that would not need to be purchased if not donated	\$0		\$0
M. Other	\$0		\$0
6. Total in-kind contributions - services and other assets (line 4 plus line 5), forwards to Schedule F, line 1c. Must agree with in-kind contributions recognized as revenue in the AFS.	\$88,401		\$80,142

Comments

Comment	Name	Date	Status
Schedule D WGCU-FM (1344) Fort Myers, FL			

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	2023 data	Donor Code	2024 data
1. Land (must be eligible as NFFS)	\$		\$0
2. Building (must be eligible as NFFS)	\$		\$0
3. Equipment (must be eligible as NFFS)	\$		\$0
4. Vehicle(s) (must be eligible as NFFS)	\$		\$0
5. Other (specify) (must be eligible as NFFS)	\$		\$0
6. Total in-kind contributions - property and equipment eligible as NFFS (sum of lines 1 through 5), forwards to Line 3b. of the Summary of Nonfederal Financial Support	\$		\$0
7. IN-KIND CONTRIBUTIONS INELIGIBLE AS NFFS	\$		\$0
a) Exchange transactions	\$		\$0
b) Federal or public broadcasting sources	\$		\$0
c) TV only—property and equipment that includes new facilities (land and structures), expansion of existing facilities and acquisition of new equipment	\$		\$0
d) Other (specify)	\$		\$0
8. Total in-kind contributions - property and equipment (line 6 plus line 7), forwards to Schedule F, line 1d. Must agree with in-kind contributions recognized as revenue in the AFS.	\$		\$0

Comments

Comment	Name	Date	Status
Schedule E WGCU-FM (1344) Fort Myers, FL			

EXPENSES

(Operating and non-operating)

PROGRAM SERVICES

	2023 data	2024 data
1. Programming and production	\$1,816,372	\$2,083,874
A. Restricted Radio CSG	\$52,069	\$59,133
B. Unrestricted Radio CSG	\$135,203	\$126,430
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$1,629,100	\$1,898,311
2. Broadcasting and engineering	\$389,454	\$394,705
A. Restricted Radio CSG	\$0	\$0
B. Unrestricted Radio CSG	\$1,910	\$5,375
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$387,544	\$389,330
3. Program information and promotion	\$182,902	\$252,762
A. Restricted Radio CSG	\$0	\$0

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	2023 data	2024 data
B. Unrestricted Radio CSG	\$4,632	\$4,801
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$178,270	\$247,961
SUPPORT SERVICES	2023 data	2024 data
4. Management and general	\$401,633	\$431,168
A. Restricted Radio CSG	\$0	\$0
B. Unrestricted Radio CSG	\$1,398	\$0
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$400,235	\$431,168
5. Fund raising and membership development	\$363,071	\$540,361
A. Restricted Radio CSG	\$0	\$0
B. Unrestricted Radio CSG	\$2,411	\$13,931
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$360,660	\$526,430
6. Underwriting and grant solicitation	\$360,592	\$495,734
A. Restricted Radio CSG	\$0	\$0
B. Unrestricted Radio CSG	\$1,171	\$15,016
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$359,421	\$480,718
7. Depreciation and amortization (if not allocated to functional categories in lines 1 through 6)	\$0	\$0
A. Restricted Radio CSG	\$0	\$0
B. Unrestricted Radio CSG	\$0	\$0
C. Other CPB Funds	\$0	\$0
D. All non-CPB Funds	\$0	\$0
8. Total Expenses (sum of lines 1 to 7) must agree with audited financial statements	\$3,514,024	\$4,198,604
A. Total Restricted Radio CSG (sum of Lines 1.A, 2.A, 3.A, 4.A, 5.A, 6.A, 7.A)	\$52,069	\$59,133
B. Total Unrestricted Radio CSG (sum of Lines 1.B, 2.B, 3.B, 4.B, 5.B, 6.B, 7.B)	\$146,725	\$165,553
C. Total Other CPB Funds (sum of Lines 1.C, 2.C, 3.C, 4.C, 5.C, 6.C, 7.C)	\$0	\$0
D. Total All non-CPB Funds (sum of Lines 1.D, 2.D, 3.D, 4.D, 5.D, 6.D, 7.D)	\$3,315,230	\$3,973,918

INVESTMENT IN CAPITAL ASSETS

Cost of capital assets purchased or donated

2023 data 2024 data

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	2023 data	2024 data
9. Total capital assets purchased or donated	\$0	\$0
9a. Land and buildings	\$0	\$0
9b. Equipment	\$0	\$0
9c. All other	\$0	\$0
10. Total expenses and investment in capital assets (Sum of lines 8 and 9)	\$3,514,024	\$4,198,604

Additional Information

(Lines 11 + 12 must equal line 8 and Lines 13 + 14 must equal line 9)

	2023 data	2024 data
11. Total expenses (direct only)	\$2,660,424	\$3,337,476
12. Total expenses (indirect and in-kind)	\$853,600	\$861,128
13. Investment in capital assets (direct only)	\$0	\$0
14. Investment in capital assets (indirect and in-kind)	\$0	\$0

Comments

Comment	Name	Date	Status
Schedule F WGPU-FM (1344) Fort Myers, FL			

Note:This grantee is joined with [WGPU-TV](#)**2024 data****1. Data from AFR**

a. Schedule A, Line 22	\$14,271,743
b. Schedule B, Line 5	\$1,892,451
c. Schedule C, Line 6	\$132,625
d. Schedule D, Line 8	\$0
e. Total from AFR	\$16,296,819

Choose Reporting Model

You **must** choose one of the three reporting models in order to complete Schedule F. After making your selection, click the "Choose" button below, which will display your reporting model. When changing to a different reporting model all data entered in the current reporting model will be lost.

- ☐ FASB
 ☒ GASB Model A proprietary enterprise-fund financial statements with business-type activities only
 ☐ GASB Model B public broadcasting entity-wide statements with mixed governmental and business-type activities

2024 data**2. GASB Model A proprietary enterprise-fund financial statements with business-type activities only**

a. Operating revenues	\$12,112,423
b. Non-operating revenues	\$4,184,396
c. Other revenue	\$0
d. Capital grants, gifts and appropriations (if not included above)	\$0

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e. Total From AFS, lines 2a-2d	\$16,296,819
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Reconciliation

2024 data

3. Difference (line 1 minus line 2)	\$0
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4. If the amount on line 3 is not equal to \$0, click the "Add" button and list the reconciling items.	\$0
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Comments

Comment	Name	Date	Status
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Exhibit D**Summary of WGCU TV/FM Non-federal Financial Support**

Line	Summary of Non-Federal Financial Support	FY 2023	FY 2024	Total
	WGCU TV:			
1	Direct Revenue (Schedule A)	\$4,064,248	\$7,003,289	\$11,067,537
2	Indirect Administrative Support (Schedule B)	\$1,340,139	\$1,111,465	\$2,451,604
3	In-kind Contributions			
	Services and Other Assets (Schedule C)	\$121,669	\$52,483	\$174,152
	Property and Equipment (Schedule D)	\$0	\$0	\$0
4	Total Non-Federal Financial Support.	\$5,526,056	\$8,167,237	\$13,693,293

Line	Summary of Non-Federal Financial Support	FY 2023	FY 2024	Total
	WGCU FM:			
1	Direct Revenue (Schedule A)	\$2,542,373	\$4,225,403	\$6,767,776
2	Indirect Administrative Support (Schedule B)	\$765,198	\$780,986	\$1,546,184
3	In-kind Contributions			
	Services and Other Assets (Schedule C)	\$80,601	\$32,685	\$113,286
	Property and Equipment (Schedule D)	\$0	\$0	\$0
4	Total Non-Federal Financial Support.	\$3,388,172	\$5,039,074	\$8,427,246

Line	Summary of Non-Federal Financial Support	FY 2023	FY 2024	Total
	WGCU TV/FM:			
1	Direct Revenue (Schedule A)	\$6,606,621	\$11,228,692	\$17,835,313
2	Indirect Administrative Support (Schedule B)	\$2,105,337	\$1,892,451	\$3,997,788
3	In-kind Contributions			
	Services and Other Assets (Schedule C)	\$202,270	\$85,168	\$287,438
	Property and Equipment (Schedule D)	\$0	\$0	\$0
4	Total Non-Federal Financial Support.	\$8,914,228	\$13,206,311	\$22,120,539

Scope and Methodology

We performed an attestation examination to determine WGPU's compliance with CPB Financial Reporting Guidelines, provisions of the Communications Act, grant certification requirements, and other grant provisions. The scope of the audit included reviews and tests of the information reported by the grantee on its AFRs that we reconciled to audited financial statements for the fiscal years ending June 30, 2023 and 2024, and grant certifications of compliance with Act requirements, and certifications on its financial reports submitted to CPB.

We tested the allowability of the NFFS claimed on the stations' AFRs by performing financial reconciliations and comparisons to underlying accounting records (general ledger) and the audited financial statements. We reviewed underwriting contracts, grant agreements, membership donations, major donor contributions, and special fundraising revenues and related expenses, in-kind support, and indirect administrative calculations and other documentation supporting revenues reported. Specifically, we reviewed NFFS revenue transactions reported totaling \$12,020,505 of the \$22,120,539 (54 percent) WGPU claimed on its FYs 2023 and 2024 AFRs.

We reviewed the allowability of expenses the stations charged to the CSGs received from CPB during FYs 2022, 2023, and 2024 that were spent in our audit period. To determine whether the stations incurred CSG and other grant expenditures in accordance with grant terms, we reviewed \$1,622,682 of the \$3,934,348 (41 percent) in CPB CSG grant expenses incurred by the stations during our audit period. For all the grant expenses reviewed, we examined supporting documentation, including invoices, proof of payments, payroll and other documentation for judgmentally selected transactions. We also reviewed the emergency grant, reconciled final financial reports to financial records, and tested transactions for allowability.

We reviewed policies, records, and documents supporting the stations' compliance with the Act's requirements to provide advance notice of public meetings, make financial and EEO information available to the public, and safeguard donor lists. We also reviewed WGPU's website to determine their compliance with CPB's transparency requirements. Our procedures included interviewing station management and staff, university internal audit management, and foundation financial management. We also reviewed the station's independent public accountant's audit workpapers for the audit period.

We gained an understanding of internal controls over the preparation of AFRs, cash receipts, and cash disbursements. We also gained an understanding of the stations' policies and procedures for compliance with certification of eligibility requirements, Communications Act, and CPB grant agreement terms for allowable costs. We used this information to assess risks and plan the nature and extent of our testing to conclude on our objectives.

We conducted fieldwork from January through April 2025. We performed our audit in accordance with the *Government Auditing Standards* for attestation examinations.

June 18, 2025

William J. Richardson III
Deputy Inspector General
Office of Inspector General
Corporation for Public Broadcasting
401 Ninth Street, NW
Washington, DC 20004-2129



**RE: Audit of Community Service and Other Grants Awarded to WGCU TV/FM
Licensed to Florida Gulf Coast University, Fort Myers, Florida for the Period July
1, 2022 Through June 30, 2024, Draft Report No. ASJ2504-XXXX**

Dear Mr. Richardson:

Thank you for the opportunity to respond to the Draft Audit Report reference above. Throughout the audit process, we have appreciated the hard work and professionalism of your staff. We have always viewed the audit process as a growth opportunity for the station and believe the organization has improved as a result of your work.

We would like to take this opportunity to address the recommendations and findings contained in the Draft Audit Report. For your convenience, we will respond to the Draft Audit Report's conclusions and the resulting recommendations in the Draft Audit Report in the order the recommendations appear.

OIG Recommendations 1 and 2:

The Draft Audit Report recommended Corporation for Public Broadcasting ("CPB") management require WGCU to: (1) repay to CPB estimated CSG payments of \$11,544; and (2) identify the corrective actions and controls WGCU has and will implement to ensure future compliance with CPB requirements for non-Federal financial support ("NFFS") reporting.

WGCU's Response:

The Draft Audit Report questioned \$123,700 in NFFS that WGCU reported to CPB during the audit period. The questioned NFFS resulted in potential Community Service Grant ("CSG") overpayments of \$11,544. The total questioned NFFS comes from two sources: \$116,679 from underwriting contributions for third-party advertising agency fees that the Draft Audit Report concluded were not constructively received by WGCU; and \$7,021 in underwriting contribution that the Draft Audit Report concluded were finder's fees and therefore payments for services, which are not eligible to be claimed as NFFS.

We agree the \$7,021 should have been categorized as payment for services and excluded from NFFS. However, when WGCU reported the \$116,679 in gross underwriting contributions that included third-party fees as NFFS, we were following the advice of our independent public accountants ("IPAs"). As we understood the advice from our IPAs,

the station may properly recognize the gross contribution an underwriter makes to WGCU through a third-party advertising agency as NFFS and then report the agency's fees as fundraising expenses to CPB instead of netting out fees from the gross contributions.

As such, because the IPAs concluded WGCU's practice of reporting the gross underwriting contributions and then reporting advertising agency fees as fundraising expenses was a proper accounting of WGCU's underwriting contributions, we believe the questioned gross underwriting contributions should be counted as NFFS. Doing otherwise places the station in the precarious position of not being able to rely on its IPAs for advice regarding NFFS reporting to CPB.

Additionally, it appears to be both inconsistent and inefficient to require a station to claim only the net underwriting contribution as NFFS when a third-party advertising agency is paid a percentage from the contribution, but a station would be able to claim the gross contribution as NFFS if the station receives the contribution and then pays the third-party agency's fee through a second transaction.

The way in which WGCU receives financial contribution from our underwriting agents at [REDACTED] and [REDACTED], which are the third-party agencies that work with WGCU, adds further ambiguity. These underwriting agents, working on behalf of WGCU, combine their staff commission and the unaffiliated agency fee as one number illustrated on their contracts at approximately forty-five percent (45%), which in reality is a combination of a thirty percent (30%) staff commission and a fifteen percent (15%) agency commission. This combined number lead the station to record the fee in the same way as the contract was delivered to WGCU.

In any event, as a result of the audit, WGCU has now undertaken further training for its staff regarding CPB's requirements for NFFS reporting as they pertain to underwriting so that WGCU properly reports NFFS to CPB.

OIG Recommendations 3 and 4:

The Draft Audit Report recommended CPB management require WGCU to: (3) fully comply with the requirements in the public broadcasting provisions of the Communications Act of 1934, as amended (the "Act") for open meetings and open financial records; and (4) identify the corrective actions and controls it has and will implement to ensure future compliance with CPB requirements for Act and General Provisions compliance.

WGCU's Response:

The Draft Audit Report found that WGCU had not fully complied with the Act's and CPB's requirements in two (2) instances.

The Draft Audit Report found WGCU did not fully comply with the Act's open meetings provisions because it had not provided advance public notice of its Advisory Council meetings in accordance with CPB's requirements. WGCU agrees that, prior to the audit

process, it did not provide such notice regarding the Advisory Council, as provided in CPB's Communications Act Compliance guidance.

During the audit period, the Advisory Council was in its organizational and planning stages. As such, meeting discussion topics were about what Advisory Council members' roles and responsibilities would be. While these roles being defined, no substantive business was being conducted by the Advisory Council. CPB's Communications Act Compliance guidance states that one (1) of the requirements for a meeting to be subject to the Act's open meetings requirements is that the body is conducting "deliberations that determine or result in the joint conduct or disposition of business relating to public broadcasting." Under these circumstances, in which the Advisory Council was still organizing itself and not conducting or disposing of the business of the body, WGPU staff did not consider meetings to be subject to the open meetings requirements.

As noted in the Draft Audit Report, WGPU is now providing such advance public notice through a posting on its website in accordance with CPB's Communications Act Compliance guidance. In fact, WGPU has posted the dates and times for the remainder of any scheduled Advisory Council meetings during 2025.²

The Draft Audit Report also found WGPU had not posted its most recent audited financial statement and annual financial reports ("AFRs") on its website as required by CPB's Communications Act Compliance guidance. As also noted in the Draft Audit Report, WGPU agreed that these documents were not on the WGPU website during the audit process and the documents were immediately posted to the website.³

WGPU station management has also implemented a process to ensure compliance with the Act and CPB's General Provisions and is actively working with staff to ensure they are trained on WGPU's compliance protocols. Compliance procedures feature multi-level checklists to promote thorough and consistent adherence to regulations.

Thank you once again for the opportunity to comment on the Draft Audit Report. Please feel free to contact me at your convenience if you have any questions or would like further information.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Corey Lewis', with a stylized, looping flourish extending to the right.

Corey Lewis
General Manager

Contact CPB OIG

If you have information about fraud, waste, or abuse involving CPB funds, initiatives, or operations, please call, write, or e-mail the Office of the Inspector General or file a complaint through our website. Your report may be made anonymously.

Call: Inspector General Hotline
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800-599-2170

Email: oigemail@cpb.org

Write: Inspector General Hotline
Office of the Inspector General
Corporation for Public Broadcasting
401 Ninth Street, NW
Washington, DC 20004-2129

Website: <https://cpboig.oversight.gov/hotline>



On October 1, 2017, the Council of the Inspectors General on Integrity and Efficiency (CIGIE) announced the official launch of [Oversight.gov](https://oversight.gov). This new website provides a “one stop shop” to follow the ongoing oversight work of all Inspectors General that publicly post reports.

The Corporation for Public Broadcasting, like the other OIGs, will continue to post reports to its own website. But with the launch of Oversight.gov, users can now sort, search, and filter the site’s database of public reports from all of CIGIE’s member OIGs to find reports of interest. In addition, the site features a user-friendly map to find reports based on geographic location, and contact information for each OIG’s whistleblower hotline. Users can receive notifications when new reports are added to the site by following CIGIE’s new Twitter account, [@OversightGov](https://twitter.com/OversightGov).