



## **KLCS DONOR LIST AND POLITICAL ACTIVITIES POLICY**

Pursuant to the Communications Act of 1934, as amended (47 U.S.C. § 396(k)(12)), KLCS maintains the following policy regarding its donor list and political activities:

KLCS does not sell, rent, lease, trade, give, donate, transfer, or exchange its membership or donor names to, with, or from any candidate for Federal, State or Local office, political committees, or political parties, nor to, with, or from any other persons or entities, for any purpose whatsoever, except as otherwise required by law or judicial process.

KLCS maintains active control of its contributor and donor lists, and takes all appropriate measures to ensure against unauthorized use of such lists including requiring any third party to abide by a grantees' compliance requirements, except as otherwise required by law or judicial process.

KLCS will refrain from disclosing contributor or donor names or other personally identifiable information to any nonaffiliated third party unless, before the time that such information is initially disclosed, they clearly and conspicuously disclose to contributors and donors that such personal information may be disclosed to a nonaffiliated third party. If such disclosure is not required by law or judicial process, the grantee shall give the contributor or donor the opportunity to direct that such information not be disclosed to a nonaffiliated third party, and give the contributor or donor an explanation of how to exercise that nondisclosure option.

KLCS will periodically remind contributors or donors of any potential for sale, rental, lease, loan, trade, gift, donation, transfer, or exchange of their names and personally identifiable information, and offer a means by which the names and other personally identifiable information may be suppressed upon request; and suppress the names as requested, except as required by law or judicial process.

KLCS maintains complete, accurate, and secure records of all uses of membership and donor lists for fundraising purposes, and must furnish such records to CPB on request.

KLCS' membership and donor lists are maintained in an electronic database accessible only by the station's General Manager, Senior Financial Analyst, and Broadcast Compliance Specialist. The Broadcast Compliance Specialist maintains active control over the station's membership and donor lists, safeguarding its confidential integrity through the use of electronic countermeasures and the station's security system.

Certification of KLCS' continued compliance with the donor list and political activities requirement is completed each year as part of the Certification of Eligibility included in the Integrated Station Information System (ISIS). This certification is executed by the General Manager of KLCS and the President of the Board of Education of the LAUSD.