ARNOLD & PORTER LLP

James P. Joseph
James_Joseph@aporter.com

202.942.5355
202.942.5999 Fax
202.251.7319 Cell

555 Twelfth Street, NW
Washington, DC 20004-1206

July 25, 2007

Elder Dave Weigley
President
Columbia Union Conference of Seventh-day Adventists
5427 Twin Knolls Road
Columbia MD 21045-3247

Re: Forced Sale of WGTS/CUC Broadcasting, Inc. Assets

Dear Elder Weigley:

On behalf of Dr. Gerald Fuller and Noel Gould, a donor to WGTS 91.9, we write to urge both you, in your position as Chairman of the Board of Trustees of Columbia Union College, as well as the entire Board of Trustees, to reconsider selling WGTS to a buyer that would no longer operate it as a Christian radio station.

The sale of WGTS to a non-Christian buyer is contrary to the religious mission of WGTS – and, indeed, contrary to the mission of Columbia Union College – and would result in immediate harm to both the Seventh-day Adventist and the larger Christian community in the Washington, D.C. area and beyond. As you know, the ministry of WGTS touches the lives of many people: currently WGTS is the second most listened-to non-commercial religious station in the country. The loss of WGTS would be the loss of one of the few family-friendly alternatives to standard radio stations, which typically play music which is at odds with Christian values.

If WGTS were to be forcibly sold to a buyer that would operate it in a non-Christian format, the station could no longer fulfill its religious mission to strengthen and expand the Christian community both inside and outside the Beltway. The station's mission is set forth as follows:

> WGTS 91.9's mission is to introduce and nurture a relationship with Jesus Christ, through music consistent with God's Word and today's adult music tastes. In doing this we will:
>
> Provide an entertaining family friendly safe haven;
>
> Provide hope and encouragement for the Washington D.C. area;

Provide resources to grow in Christ.

The importance of the WGTS 91.9 religious mission is echoed in the Bylaws of WGTS/CUC Broadcasting, Inc., which provide, among other things, that the station's activities should "reflect the ideals of Columbia Union College" (which are inherently spiritual in nature, as it is a Christian College affiliated with the Seventh-day Adventist Church) and "present to the community cultural, informational and religious programs produced by the Columbia Union College music, religion, and other departments and organization." Further, religion is clearly set forth in the station's Articles of Incorporation as one of the purposes for which it was formed – and this purpose would clearly not be realized if the radio station were to be secular in nature. Further, WGTS is also one of the most valuable assets of Columbia Union College, likely its most vital hands-on learning tool and vehicle for publicizing the College and its religious values; this is reflected in the WGTS Bylaws which state that the stations will "provide practical experience for the student of Columbia Union College" and "establish and foster goodwill between Columbia Union College and its alumni, its constituency, and its community."

There is much current debate as to whether or not the sale of the WGTS license is enough to "save" the Columbia Union College from its current fiscal and management crisis – and whether it makes sense for the College to part with the $1.6 million in "donations" that the College receives from the radio station on an annual basis. However, it is downright puzzling that the College's Board of Trustees state that the "goal of any potential sale is to protect and grow the future of Columbia Union College as an Adventist Christian college in the nation's capital" – yet they appear unwilling to consider seriously options that would enable the College to realize significant financial benefit, while at the same time preserving the Christian spirit of the radio station.

Our clients, along with many supportive members of the WGTS listening community, are left with no other choice than to do whatever it takes to prevent the station's conversion to a non-Christian format. As you are surely aware, there are a variety of ways that we can pursue this course of action, including the following.

Before the sale of the station could be consummated, WGTS/CUC Broadcasting, Inc. would be required to file an application with the FCC seeking advance approval for the transaction. We would file an objection to such a sale based upon our public interest concerns arising from the loss of an important Christian radio station and Seventh-day Adventist ministry in the metropolitan Washington, D.C. area.

The sale of the WGTS license would require the approval of the Board of Directors of WGTS/CUC Broadcasting, Inc. Should the Board of Trustees of Columbia Union College attempt to force the sale of WGTS by replacing a majority of the Board of Directors of the radio station, WGTS/CUC Broadcasting, Inc. would be required to file an application with the Federal Communications Commission ("FCC") seeking advance approval for the change of a majority of board members. Again, we would file an objection to such change in composition of the Board of Directors, based on the Columbia Union College's Board of Trustees apparent intent to replace the radio station Board members with ones who will "rubber stamp" a sale to a non-Christian buyer.

It is our understanding that WGTS currently leases its tower space from WETA 90.9 and that, pursuant to the terms of this lease, WETA has the authority to approve any transfer of the lease. Therefore, we would actively petition WETA to block the transfer of the lease to any non-Christian buyer, in particular to a competitor of WETA such as Minnesota Public Radio.

WGTS is continuing to conduct charitable solicitations to support the station and its ministry. Dr. Fuller and Mr. Gould, along with other donors, must determine if Columbia Union College misled donors regarding how their contributions would be used by seeking funds to operate a Christian radio station, while simultaneously arranging a sale that would transform the station into a non-Christian format. Donors may also seek a determination of whether the Board has violated its fiduciary duties with respect to the funds donated.

We sincerely hope that you will reconsider the sale of WGTS to a non-Christian buyer, and instead look within the Christian community. So that we may further discuss these issues, we request that you contact us to arrange a meeting with our clients.

Sincerely,

James P. Joseph

cc: Board of Trustees, Columbia Union College
Board of Directors, WGTS/CUC Broadcasting, Inc.