

COMPREHENSIVE EXHIBIT: LICENSE RENEWAL APPLICATION OF WVKM(FM) (“STATION”)

Regarding Certifications Made in Renewal Application. On June 30, 2015, the Federal Communications Commission (“FCC” or “Commission”) consented to the assignment of the license of FM radio station WVKM(FM), Matewan, West Virginia, Facility Id. 67039 (“Station”) from Three States Broadcasting Company, Inc. to West Virginia Educational Broadcasting Authority (“WVEBA”).¹ Thereafter, WVEBA notified the Commission that the consummation of the assignment of the license of the Station occurred on July 13, 2015. Accordingly, the certifications made in the instant application cover only the period from July 13, 2015 to the date of the instant application to renew the station license for WVKM(FM).²

Online Public Inspection File. WVEBA maintains an online public inspection file (“OPIF”) for the Station pursuant to Section 73.3527 of the FCC’s rules. On March 1, 2018, in compliance with the deadline for radio stations to transition to the online public inspection file, the Station transferred its existing issues and programs lists (“Existing I/P Lists”) to the OPIF. At this time, however, the Station inadvertently uploaded the Existing I/P Lists to the “Additional Documents” subfolder of the “Station Information” folder, rather than to the “Issues and Programs” subfolder. The Station subsequently uploaded the Existing I/P Lists to the “Issues and Programs” subfolder of the OPIF on March 16, 2018. At this time, the Station inadvertently uploaded the issues and programs lists for 2017 to the “2016” “Issues and Programs” subfolder. Upon discovery of this matter in connection with preparation of the instant license renewal application, the Station uploaded the issues and programs lists for 2016 to the “2016” “Issues and Programs” subfolder, except with respect to the “Issues and Programs” list covering the period from September 28, 2016 through December 31, 2016, as the Station was not operating during this period pursuant to silent special temporary authority from the FCC.³

The Station also inadvertently failed to transfer its existing issues and programs lists covering the period from September 1, 2011 through December 31, 2011 (“Q4 2011”) to the OPIF by the March 1, 2018 deadline. Upon discovery of this omission in connection with the preparation of the instant license renewal application, the Station uploaded the issues and programs lists covering Q4 2011 to the “Issues and Programs” subfolder of the OPIF. Note that, because the OPIF does not contain a “2011” “Issues and Programs” subfolder, the Station uploaded the Q4 2011 materials to the “2012” “Issues and Programs” subfolder. The Station timely placed all of the aforementioned Existing I/P Lists (including the Q4 2011 issues and programs lists) in the paper public inspection file maintained for the Station.

The foregoing omissions primarily resulted from changes in Station personnel responsible for public inspection file compliance. WVEBA acknowledges the importance of maintaining a complete and organized OPIF and, to this end, intends to institute procedures designed to ensure that Station employees tasked with OPIF compliance understand the FCC’s

¹ See FCC File No. BALH-20150330AAA.

² See Instructions – Form 2100, Schedule 303-S, p. 2 (“if the station license was assigned or transferred during the subject license term pursuant to a “long-form” application on FCC Form 314 or 315 (or any successor application forms that the Commission releases), the renewal applicant’s certifications should cover only the period during which the renewal applicant held the station’s license.”).

³ See FCC File No. BLSTA-20161024ACT.

OPIF requirements. For example, WVEBA plans to initiate an OPIF training program that Station employees tasked with maintaining the OPIF will participate at the time of hire and on a periodic basis thereafter.

Minimum Operating Schedule. The Station was silent for the periods from January 13, 2015 through January 1, 2016, and from September 28, 2016 through March 29, 2017, pursuant to special temporary authority.⁴

⁴ See FCC File Nos. BLSTA - 20150121AAT; BLSTA - 20161024ACT.