

Renewal Exhibit

Limited Licensee Ownership Period

The Applicant became the Licensee of the Station subject to the instant application after the commencement of the current license term. Accordingly, for the Station, the scope of the Applicant's certifications and exhibits in the instant application is limited to the period after which the Applicant became the Licensee.

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Non-Discrimination in Advertising Sales Agreements

At no time on or before August 1, 2019, has the Licensee, to its knowledge, accepted advertising that was placed with an intent to discriminate on the basis of race or ethnicity. Further, at no time on or before August 1, 2019, have the Licensee's sales practices or its verbal advertising sales agreements discriminated on the basis of race or ethnicity.

However, out of an abundance of caution, the Licensee has answered this certification "No" because it does not generate and generally does not enter into formal written advertising sales contracts.¹ As of the date of this application, the Licensee has incorporated non-discrimination clauses into its written communications with advertisers, including: in its email correspondence; in its correspondence regarding confirmation of placed advertising orders; and on its invoices to advertising sales clients.

* * *

In addition, the Licensee wishes to note the following:

¹ To the extent that the Commission determines that the Licensee did not comply with the requirement that non-discrimination clauses be included in advertising agreements (which non-compliance the Licensee does not concede, as it believes it has indeed complied with the rule), the Licensee respectfully requests that the Commission treat it in the same manner that it has treated licensees who have come into compliance with the rule in an untimely manner: that is, by excusing the delay as a *de minimis* violation, while cautioning the licensee "of the importance of continued full compliance with this requirement." See, e.g., *Killeen Christian Broadcasting Corp., Licensee of Station KPLE-CD, Killeen, Texas*, Notice of Apparent Liability for Forfeiture, 29 FCC Rcd 8357, 8360 n.7 (2014) (excusing delay as *de minimis* where licensee had recently come into compliance); *Campbellsville Univ., Licensee of Station WLCU-CA, Campbellsville, Kentucky*, Notice of Apparent Liability for Forfeiture, 28 FCC Rcd 12649, 12651 n.4 (excusing delay as *de minimis* where licensee had recently begun a process to revise its forms and procedures for selling advertising time to incorporate the appropriate nondiscrimination language).

Byrne Acquisition Group, LLC
2019 License Renewal Application, Schedule 303-S
WEZV(FM), Fac. ID No. 49986
WYEZ(FM), Fac. ID No. 23898
WTKN(FM), Fac. ID No. 34901

Online Public Inspection File

The Licensee wishes to note that the Fourth Quarter 2018 issues/programs list was timely filed once the federal government reopened after the shutdown.

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