

## WARO PUBLIC FILE EXHIBIT

### Missing Items:

The licensee has not identified any items that are presently missing from the public inspection file.

### Late Filed Items<sup>1</sup>:

#### A. Political File Items

Based solely on the information appearing on the face of the documents, the following political file items were not uploaded to the public inspection file immediately<sup>2</sup>:

Item	Date Created	Date Placed in File
Donald Trump for President	10/29/18	11/2/18
Donald Trump for President	10/31/18	11/13/18
Francis Rooney	10/4/18	10/11/18
Francis Rooney	10/8/18	10/19/18
Francis Rooney	10/4/18	10/19/18
Francis Rooney	10/8/18	11/2/18
Francis Rooney	10/8/18	11/2/18
Francis Rooney	11/6/18	12/14/18
Francis Rooney	10/31/18	12/14/18
Rick Scott	10/16/18	10/19/18
Rick Scott	10/16/18	10/26/18
Rick Scott	10/17/18	11/2/18

---

<sup>1</sup> The information regarding late filed items is already on file with the Commission in the online public inspection files. Requiring this information in a license renewal application contravenes the provisions of Section 307(c)(2) of the Communications Act. The applicant's actions complying with this improper inquiry should not be construed as a waiver of its objection to violation of its rights under 47 USC §307(c)(2).

<sup>2</sup> Many of the dates relied upon in this list were generated by the station's traffic system and do not necessarily correspond to the date a physical document was available to scan and upload into the public inspection file. This is especially so in the case of invoices. Invoices are usually printed at the beginning of the month after the date shown on the invoice. So an invoice dated in October 2018 would normally be printed in the first part of November 2018. The submission of this list should not be construed as the station's agreement that political file items were not placed in the public inspection file as soon as possible.

Rick Scott	10/31/18	11/13/18
Rick Scott	10/28/18	11/13/18
Rick Scott	10/28/18	11/13/18
Rick Scott	11/6/18	11/13/18
Taruas Pugh	8/22/18	8/24/18
Taruas Pugh	8/31/18	9/12/18
Matt Miller	8/22/18	8/24/18
Matt Miller	8/31/18	9/12/18
Giffords PAC	10/31/18	11/2/18
Giffords PAC	11/6/18	12/14/18
Vote No on 3	8/17/18	10/5/15
Voters in Charge	11/2/18	11/5/18
Voters in Charge	11/4/18	11/13/18
Voters in Charge	10/28/18	11/13/18
Voters in Charge	10/21/18	11/13/18
Voters in Charge	10/14/18	11/13/18
Voters in Charge	10/7/18	11/13/18
Voters in Charge	9/30/18	11/13/18
Voters in Charge	8/10/18	11/13/18
Voters in Charge	11/6/18	12/14/18
Voters in Charge	11/6/18	12/14/18
No Blank Check PAC	8/20/18	8/24/18
No Blank Check PAC	8/26/18	9/12/18
SFCFJ <sup>3</sup>	7/26/18	7/30/18
SFCFJ	8/6/18	8/10/18
SFCFJ	7/29/18	8/14/18
SFCFJ	8/14/18	8/17/18
SFCFJ	8/20/18	8/24/18
SFCFJ	8/31/18	11/13/18

---

<sup>3</sup> Southwest Florida Conservatives for Justice (SFCFJ)

SFCFJ	8/26/18	11/13/18
SFCFJ	8/26/18	11/13/18
SFCFJ	8/19/18	11/13/18
SFCFJ	8/12/18	11/13/18

B. Issues Programs Lists

The following issues programs lists were belatedly uploaded to the online public inspection file on the dates indicated:

Year	Quarter	Date Uploaded
2012	1	8/5/19
2012	2	8/5/19
2012	3	8/5/19
2012	4	8/5/19
2013	1	8/5/19
2013	2	8/5/19
2013	3	8/5/19
2013	4	8/5/19
2014	1	8/5/19
2014	2	8/5/19
2014	3	8/5/19
2014	4	8/5/19
2015	1	8/5/19
2015	2	8/5/19
2015	3	8/5/19
2015	4	8/5/19
2016	1	8/5/19
2016	2	8/5/19
2016	3	8/5/19
2016	4	8/5/19
2017	4	8/5/19
2018	2	8/5/19
2018	3	8/5/19
2019	2	8/5/19

### C. Steps Taken to Reconstruct Missing Information

The following issues programs lists were missing and subsequently recreated:

Year	Quarter
2012	1 <sup>ST</sup> QTR
2012	2 <sup>ND</sup> QTR
2012	3 <sup>RD</sup> QTR
2012	4 <sup>TH</sup> QTR
2013	1 <sup>ST</sup> QTR
2013	2 <sup>ND</sup> QTR
2013	3 <sup>RD</sup> QTR
2013	4 <sup>TH</sup> QTR
2014	1 <sup>ST</sup> QTR
2014	2 <sup>ND</sup> QTR
2014	3 <sup>RD</sup> QTR
2014	4 <sup>TH</sup> QTR
2019	2 <sup>ND</sup> QTR
2015	1 <sup>ST</sup> QTR
2015	2 <sup>ND</sup> QTR
2015	3 <sup>RD</sup> QTR
2015	4 <sup>TH</sup> QTR
2016	1 <sup>ST</sup> QTR
2016	2 <sup>ND</sup> QTR
2016	3 <sup>RD</sup> QTR
2016	4 <sup>TH</sup> QTR
2017	1 <sup>ST</sup> QTR
2017	2 <sup>ND</sup> QTR
2017	3 <sup>RD</sup> QTR
2017	4 <sup>TH</sup> QTR
2018	2 <sup>ND</sup> QTR
2018	3 <sup>RD</sup> QTR

Station personnel reviewed the following materials in recreating the missing issues programs lists:

Promotional Schedules, Station Logs, Personnel notes and computer files and public comments.

#### D. Procedures Adopted to Prevent Recurrence of Problems

Licensee believes that decentralization of public inspection filing responsibilities contributed to the problems experienced with the station's public inspection file. Specifically, responsibility for creating the station issues programs lists was dispersed among the applicant's various program directors, some of whom did not perform this function correctly.

To remedy its public inspection file problems, the station has designated a single individual as the person responsible to the general manager for insuring all public inspection file materials are prepared and posted to the online file in a timely manner. Station personnel have been instructed on the importance of uploading political materials to the public file immediately and will take care to note any unusual circumstances that prevent them from accomplishing this mandate.

The station's procedures have also been changed to provide for periodic outside review of station operations, including its public inspection filings, for compliance with FCC requirements. Specifically the licensee has enrolled the station in the Florida Association of Broadcasters' Alternative Inspection Program. Details on this program are attached hereto. The licensee will have the station re-inspected every three years, as contemplated in the program.

# FCC Alternative Inspection

You are here:

1. [Home](#)
2. [FCC](#)
3. FCC Alternative Inspection

FAB, in cooperation with the FCC, has contracted with an independent inspector who can do a complete FCC inspection of Florida's stations. If no problems are found, FAB will report compliance to the FCC and issue the station a Certificate of Compliance.

If problems exist, the inspector will provide the station with a confidential report outlining any problems or FCC violations. The station is then able to correct the problems identified within a specified length of time, submit a re-inspection or provide an alternative proof of compliance. Once the station has a clean bill of health, FAB will notify the FCC of the compliance and provide the station with a Certificate of Compliance. In return, the FCC will then agree NOT to perform random inspections on your station for a period of three years

## Procedure

- Fill out the Inspection Application, read all the provisions of the program carefully filling in all designated blanks, and sign the form. Please note: if you are signing up for multiple stations, copy the form and fill out a separate copy for each station.
- Write a check made payable to FAB.
- Mail the Inspection Application and **check** to the following address:

Florida Association of Broadcasters, Inc.  
201 South Monroe Street, Suite 201  
Tallahassee, FL 32301

- FAB will then turn it over to its inspectors for scheduling.
- Once the station is scheduled for inspection, the station will be protected against an FCC surprise inspection. The FCC checks with FAB to verify which stations are participating in the Alternative Inspection Program before conducting a random surprise inspection. The FCC agrees NOT to inspect for reasons other than good cause, such as a complaint not being filed, and has the right to inspect the station without notice to FAB or participating stations.
- FAB will then notify the FCC of the station's participation in the Alternative Inspection Program once the contract inspector has signed off on the station. (Please note: FAB will NOT notify the FCC of the station's participation in the Alternative Inspection Program until the contract inspector has signed off on the station.) The contract inspector assures 100 percent confidentiality with all stations participating in the program

## Cost

The cost of the Alternative Inspection Program is designed to be affordable to all stations; however, no application will be accepted without payment.

	<b>AM Stations</b>	<b>FM Stations</b>	<b>TV Stations</b>
<b>Member Cost</b>	\$400	\$450	\$500
<b>Non-Member Cost</b>	\$800	\$900	\$1000

Please note: If a re-inspection is necessary due to problems found, the station will be responsible for all inspector travel costs and charged half of the original FAB-ABIP inspection fee. In many cases, re-inspection may not be merited

### **Time Restrictions**

Stations **MUST** be scheduled and inspected within 60 days of receipt of the Inspection Application. For those stations that cannot be inspected in the allotted time frame, the application and fee will be returned, less a \$40 processing fee.

If a station files their Inspection Application, it is assumed the station is ready to participate in the Alternative Inspection Program.

While stations are allotted a 30-day time frame in which to respond to any notices, a period of up to 60 days from the date of inspection is allotted to either issue a Certificate of Compliance or close a file. Adequate justification and documentation is required for the additional 30-day extension.

