

COMPREHENSIVE EXHIBIT
LICENSE RENEWAL APPLICATION OF WVPB-TV ("STATION")

Certifications. The Station is a non-commercial educational television station ("NCE"). Accordingly, WVEBA has responded "N/A" to questions regarding compliance with the FCC's rules governing multiple ownership, non-discriminatory advertising sales agreements, children's television programming commercial limitations and programming reports, notification to publishers of program guides, and publicizing children's television programming reports. WVEBA also has responded "N/A" to the certification regarding posting the EEO public file report to the Station's website because the Station does not employ five or more full-time employees.¹

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. During the course of preparing the instant license renewal application, WVEBA determined that 6 issues and program reports for the Station were filed one day to approximately four months later than specified in the applicable FCC rule. WVEBA also determined as it was preparing this license renewal application that it had inadvertently failed to upload 6 issues and programs reports for the Station and has corrected this unintentional omission by uploading these reports to the OPIF. The foregoing late-filings and omissions primarily resulted from changes in Station personnel responsible for public inspection file compliance.² WVEBA acknowledges the importance of maintaining a complete and organized OPIF and, to this end, has instituted procedures designed to ensure that Station employees tasked with OPIF compliance understand the FCC's OPIF requirements (e.g., WVEBA has initiated an OPIF training program that Station employees tasked with maintaining the OPIF will participate in at the time of hire and on a periodic basis thereafter).

W51EG-D. WVEBA is the licensee of W51EG-D, which rebroadcasts the signal of WVPB-TV, which also is licensed to WVEBA. Thus, WVEBA has responded "N/A" to the question regarding rebroadcast consent. WVEBA has responded "No" to the questions regarding silent status and adherence to minimum operating schedule because W51EG-D is currently off-air. Specifically, on February 18, 2020, W51EG-D ceased broadcasts in order to accommodate T-Mobile's operations in the 600 MHz band, pursuant to special temporary authority. *See* FCC File No. 0000106340. WVEBA has obtained a displacement construction permit to relocate W51EG-D to channel 34, but has not yet constructed this facility. *See* LMS File No. 0000073090.

¹ WVEBA operates its television and radio stations as a state public broadcast network with central headquarters in Charleston, West Virginia. Where appropriate, employees in the regional television and radio stations are involved in recruitment/employment activities for their individual stations, as well as general recruitment efforts for the agency as a whole. Other than WSWP-TV (which is the location of WVEBA's television network operations) and WVPB-FM (which is the location of WVEBA's radio television network operations), there presently are fewer than five full-time employees at each individual station licensed to WVEBA.

² At the staff's request, WVEBA would be glad to provide more details regarding the OPIF filings described in the text.