FCC Form 303-S

License Renewal for WIND(AM)

Facility ID No. 67068

EXHIBIT – Online Public Inspection File

In preparation for filing the instant renewal application, the licensee reviewed the public inspection file for WIND(AM) (FCC ID: 67068) (the “Station”) and found the issues addressed below:

*EEO Public File Reports* – The EEO public file reports for the following reporting periods 8/1/12 to 7/31/13, 8/1/13 to 7/31/14, 8/1/14 to 7/31/15, 8/1/15 to 7/31/16, 8/1/16 to 7/31/17, and 8/1/17 to 7/31/18 were uploaded to the public file late, on February 25, 2019 due to an inadvertent oversight on the part of Station personnel.

*Political File* – The licensee found certain inconsistencies in the timing and placement of political broadcasting materials in the online file. It is the Station’s practice to use the National Association of Broadcaster’s Political Advertising Agreement Forms (“NAB PB”) when requests for political advertising are made. The licensee noted that the NAB PB forms, orders, and invoices reflecting the schedule of actual time purchased and information regarding the rate charged and class of time purchased in some instances appear to have been uploaded late due to miscommunication among Station personnel about the political file requirements, as well as a lack of clear policy and procedure at the Station for ensuring proper maintenance of the online political file.

*Issues and Programs Lists –* The licensee’s Quarterly Issues and Programs List for the fourth quarter of 2017 was uploaded to the online public inspection file one day late on January 11, 2018 due to an inadvertent oversight on the part of Station personnel.

*Time Brokerage Agreements* – In reviewing its online public inspection file for purposes of filing the instant renewal application, the licensee discovered that some of its current time brokerage agreements were not timely uploaded to the online public file within thirty (30) days of the date of execution.

As a result of discovering these issues, the licensee has taken effective steps to ensure full compliance with all online public file requirements, including specific training of staff responsible on the rules pertaining to the maintenance of the political file and establishing clear Station policy and procedure regarding proper file maintenance, especially with respect to the importance of timely uploading material to the file. Furthermore, specific to the political file issues, the Station has implemented a new system whereby each day, the station’s accounts receivables and collections team runs a report containing all political orders received that day. The list then gets emailed to the local engineer as well as the Station’s HR Manager that same day. If either the engineer or HR Manager fails to receive the email with a political order report on any given day, that signals to them that they need to follow up with the accounts receivables and collections team in case there was a technical glitch with the email system.