

Renewal Exhibit

Online Public Inspection File

The Licensee wishes to note that the Third Quarter 2013 Issues/Programs Report and Certification of Compliance with Children's Commercial Limits, the Fourth Quarter 2018 Issues/Programs Report and Certification of Compliance with Children's Commercial Limits, and the Fourth Quarter 2018 Children's Television Programming Report were each timely uploaded to the online public inspection file (OPIF) and/or filed once the federal government reopened after shutdowns.

The License notes the following instances in which documents were uploaded to the OPIF late:

- The Issues/Programs Report for Fourth Quarter 2012 (the first such Report for the license term) was uploaded approximately one month late.
- The list of contracts required by 47 C.F.R. § 73.3526(e)(5) and § 73.3613 was updated and uploaded in May 2020 in connection with preparation of the instant license renewal application to include certain multicast station affiliation agreements that were inadvertently excluded from the 2019 Biennial Ownership Report due by (and timely filed by) January 31, 2020.
- The Annual DTV Ancillary/Supplementary Services Reports required by 47 C.F.R. § 73.624(g) for the years 2015, 2016, and 2017 were timely filed for WLFB. However, WLFB was not the "lead" station listed in the Reports (rather, commonly owned station WAGV(TV) was the "lead" station) and, as such, due to technical issues outside the Licensee's control, these Reports were not automatically imported into WLFB's OPIF. The Licensee manually uploaded the Reports to the OPIF in connection with preparation of the instant license renewal application. As of the revision of 47 C.F.R. § 73.624(g)'s reporting requirements in 2018, the station was not required to file Annual DTV Ancillary/Supplementary Services Reports since 2017 because it has offered no feeable services during the relevant time period.

The Licensee respectfully submits that the late uploads described above are not material to its overall compliance with 47 C.F.R. § 73.3526. The Commission has previously granted license renewal applications for analogous public file deficiencies without monetary sanctions. *See, e.g., KVOA Communications, Inc.*, Letter Decision, 23 FCC Rcd 18096 (MB 2008) (granting Class A station's renewal with non-monetary admonishment where two Issues/Programs Reports were

missing, one Issues/Programs Report was placed in the public file nine days late, two Children's Television Programming Reports were placed in the public file one month and nine (9) days late, respectively, and one Certification of Compliance with Children's Commercial Limits was nine days late); *Univision Atlanta LLC*, Letter Decision, 20 FCC Rcd 20102, DA 05-3231 (MB 2005) (granting renewal application with non-monetary admonishment where one Issues/Programs Report was missing). The Licensee respectfully requests similar treatment under the circumstances of this case.

Children's Television Programming Reports

The Licensee timely filed and hereby incorporates by reference the Children's Television Programming Reports filed during the license term for WLFB with the following amendments¹:

- WLFB launched six (6) new multicast program streams during First Quarter 2018. The Licensee inadvertently miscalculated and misreported the "average number of hours per week of Core Programming broadcast by the station on other than its main program stream" for the Second, Third, and Fourth Quarters of 2018. The weekly average for the multicast program streams during this period is amended as reflected in the table below.
- WLFB launched an additional new multicast program stream during First Quarter 2019, bringing the total number of multicast programs streams to seven (7). The Licensee inadvertently miscalculated and misreported the "average number of hours per week of Core Programming broadcast by the station on other than its main program stream" for the Second Quarter 2019. The weekly average for the multicast program streams during this period is amended as reflected in the table below.
- The Licensee inadvertently miscalculated and misreported the "average number of hours per week of free over-the-air digital video programming broadcast by the station on other than its main program stream" for several quarters. The number reported is amended for the quarters and as reflected in the table below.

¹ These errors were discovered in connection with preparation of the instant license renewal application in April and May 2020, after the release of the recently revised Children's Television Programming Report form. The previous version of the Children's Television Programming Report was no longer available in LMS to make these amendments after the errors were discovered.

Quarter and Year	Average Weekly Hours of Multicast Core Programming	Average Hours Per Week of Free OTA Programming (Other Than Main)
Second Quarter 2018	24.5	1,008
Third Quarter 2018	24.62	1,008
Fourth Quarter 2018	24.62	1,008
First Quarter 2019	No Amendment	1,176 ²
Second Quarter 2019	24.5	1,176
Third Quarter 2019	No Amendment	1,176 ³

To the extent of any conflict between the data reported herein and the Children’s Television Programming Reports identified above, the data reported herein shall control. The Licensee incorporates by reference the Children’s Television Programming Reports filed during the license term as amended hereby and certifies such Reports, as amended, contain all required information.

These errors described above and corrected herein were purely errors in reporting. WLFB aired sufficient Core Programming, as defined in 47 C.F.R. § 73.671, for the main program stream and multicast program streams to comply with the license renewal “safe harbor” processing guidelines then in effect, *see* 47 C.F.R. § 73.671(e), and otherwise complied with applicable children’s television programming rules at all times during the license term.

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² This number (1,176) was accurately reported in the Liaison Contact comment box of the Report but is repeated here for clarity.

³ The Third Quarter 2019 Report referred to above is the final Children’s Television Programming Report filed after the new children’s television rules went into effect, covering the period July 1, 2019-September 15, 2019. The amendment herein does not impact the Third Quarter 2019 data reported for WLFB in the first Annual Children’s Television Programming Report for 2019 (filed in 2020).