

FCC Form 303-S  
Online Public File Certification

On August 15, 2017, Univision Local Media, Inc. (“Univision”) consummated its acquisition of WRCF-CD, Orlando, FL (the “Station”), pursuant to FCC File No. BALDTA-20170512BCO. The responses and certifications in this Form 303-S cover only period in the Station’s license term during which Univision was the Station licensee, and not the period when the Station was controlled by its prior owner. The Station currently rebroadcasts the programming of sister station WVEN-TV, Melbourne, FL, which is party to a joint sales agreement with another broadcaster in the Orlando market.

Univision submits that the Station generally has met the requirement in Section 73.1943(c) of the FCC rules to post political orders to the online public file "immediately, absent unusual circumstances." In the interest of transparency, however, it is providing additional information in this exhibit:

- An issue ad featuring Rick Scott was contracted for on March 10, 2020 and posted to the public inspection file April 9<sup>th</sup>, 2020.
- A federal candidate spot for Michael Bloomberg was contracted for February 7, 2020 and posted to the public file on February 20<sup>th</sup>, 2020.
- A federal candidate spot for Donald J. Trump was contracted for August 3, 2020 and posted to the public file on August 13<sup>th</sup>, 2020.
- Federal candidate spots for Joe Biden were contracted for on August 3, 2020 and posted to the public file on August 13<sup>th</sup>, 2020, and contracted for July 6, 2020 and posted to the public file July 16<sup>th</sup>, 2020.

*Background on Pandemic in Orlando.* Univision submits that the COVID-19 pandemic is an “unusual circumstance” meriting regulatory relief from the Commission’s normal interpretation of its posting requirement. The state of Florida was particularly hard hit by the pandemic, resulting in both government and employers adopted restriction measures to address the health emergency.

On March 1<sup>st</sup>, 2020, Governor Ron DeSantis announced the first positive results for COVID-19 tests in Florida. Just over a week later, he declared a state of emergency and ordered a cruise ship, the Regal Princess, to remain offshore in South Florida after 21 passengers tested positive for the virus. Later that month, Governor DeSantis ordered all restaurants to end inside dining and all public schools to take an additional week off following spring break. On March 23<sup>rd</sup>, with over 1,200 confirmed cases of the Coronavirus in Florida, the Governor asked President Trump for a “major disaster” declaration to active FEMA assistance.<sup>1</sup> On April 1<sup>st</sup>, Governor

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<sup>1</sup>“Timeline: The spread of coronavirus in Florida,” Adrienne Cutway, Web Editor, Click Orlando.com, September 11, 2020, <https://www.clickorlando.com/news/local/2020/03/20/timeline-the-spread-of-coronavirus-in-florida/>

DeSantis issued a statewide stay-at-home order and on April 18<sup>th</sup> announced that public schools would remain closed for the remainder of the academic year.<sup>2</sup>

Unfortunately, the attempted reopening of the state in May and June resulted in a “disastrous” spike in COVID cases in late June and July. The state set records for new COVID cases on a daily basis on June 26<sup>th</sup> (8,942), June 27<sup>th</sup> (9,585) and the Fourth of July (11,458). On July 27<sup>th</sup> Florida reported over 430,000 cumulative COVID cases, surpassing the total of New York. The state set records for COVID deaths on a daily basis on July 28<sup>th</sup> (191), July 29<sup>th</sup> (217), July 30<sup>th</sup> (252), and July 31<sup>st</sup> (257).<sup>3</sup>

On September 26, 2020, just before the filing of this renewal application, Florida reported over 2,700 new cases of COVID-19 and 107 additional resident deaths, bringing the total number of residents who have died from the virus to over 14,000 people. Florida has had over 698,000 confirmed cases and over 43,000 hospitalizations attributed to COVID-19, according to the state health department’s dashboard. As of September 21<sup>st</sup>, there were over 39,000 confirmed cases of COVID-19 in Orange County and 8,500 in Brevard County.<sup>4</sup>

In March of 2020, in the face of the first wave of the pandemic, UO’s parent company, which is headquartered in Florida, directed all employees whose job function was not essential to the physical job site to work from home, including the employee responsible for maintaining the public inspection file. Working from home during the pandemic made coordination between sales and the employee charged with posting related paperwork more difficult. Univision’s work-from-home policies continued in effect as COVID-19 made its dramatic resurgence over the summer.

To be clear, Univision recognizes the importance of posting political information to the public file “immediately” absent unusual circumstances. With the benefit of experience in dealing with the pandemic in Florida, and despite ongoing resource challenges, Univision has worked with its employees involved in the political sales process to emphasize the need for timely posting of relevant documentation even in adverse circumstances such as this year’s events.

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<sup>2</sup> Id.

<sup>3</sup> Id.; “How hard will COVID-19 hit Miami-Dade this fall? We explored the potential scenarios,” Ben Conarck and Douglas Hanks, Miami Herald, September 16, 2020

<sup>4</sup><https://weather.com/coronavirus/l/097e1bca00ad0046dd7b9ca0c3e7f4bca7d2d0a77471902e49d744b4c814464>  
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