

FCC Form 303-S  
Online Public File Certification

WVEA-TV, Tampa, FL (the "Station") is licensed to and operated by Unimas Tampa LLC ("UT") and subject to a joint sales agreement with another broadcaster in the market.

While UT can confirm that, during the current license term, the Station diligently prepared the required quarterly Commercial Limit Certifications on a timely basis, it appears that the first quarter 2013 Certification was inadvertently posted to the public inspection file late on July 10, 2013. UT regrets this error in oversight and has since instituted a closer review of its compliance practices in order to better adhere to the required quarterly public file upload deadlines.

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

- Three Nelson for Senate spots were contracted for on August 17th, 2018, and the related paperwork was posted to the Station's public inspection file on October 15<sup>th</sup>, October 24<sup>th</sup> and November 5<sup>th</sup>, 2018. The first of these flights did not begin until October 31, 2018.
- Another Nelson for Senate spot was contracted for on October 25, 2018 and the related paperwork was posted to the public file on November 5, 2018, as the employee responsible for uploading this paperwork was out sick.
- An issue ad sponsored by Rick Scott for Florida was contracted for March 10, 2020 and the related paperwork was posted to the public file April 9<sup>th</sup>.

In particular, the 2020 Rick Scott for Florida spot coincided with the explosion of COVID-19 and imposition of lock down protocols in Florida, a highly unusual circumstance. 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. 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> 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. On April 1<sup>st</sup>, Governor DeSantis issued a statewide stay-at-home order.<sup>2</sup>

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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/>

<sup>2</sup> Id.

Florida's Department of Health reports that the state of Florida has 684,000 confirmed cases and 13,295 resident deaths.<sup>3</sup> As of September 28th, there were over 41,900 confirmed cases of COVID-19 in Hillsborough County.<sup>4</sup>

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>3</sup> "Miami-Dade coronavirus death toll hits 3,000 as Florida adds 3,204 new cases," Michelle Marchante, Miami Herald, September 18, 2020, <https://www.miamiherald.com/news/coronavirus/article245832120.html>

<sup>4</sup> <https://www.hillsboroughcounty.org/residents/public-safety/emergency-management/stay-safe/covid-19-dashboard>