

Online Public Inspection File

The Licensee became subject to the requirement to upload public inspection file documents in the FCC online public inspection file (“OPIF”) as of March 1, 2018. *See* 47 C.F.R. § 73.3526(b)(2)(i).

The Licensee has certified in the negative to the question asking whether the documentation required by 47 C.F.R. § 73.3526 has been uploaded to the station’s public inspection file when required. The Licensee submits this explanatory exhibit to address the following circumstances:

- The Fourth Quarter 2018 Issues/Programs Report was timely uploaded to the OPIF and/or filed once the federal government reopened after shutdowns.
- The Licensee has not had a high volume of political activity over the past two years. Review of the political file during renewal preparation showed that the Licensee inadvertently failed to upload required records for 2019 and 2020. The station did have a regular practice of uploading political file material during 2018; however, in some instances, the uploads were not timely or complete. In each instance the station did not fully disclose the specifics about the class of time sold, although this information was disclosed in a “priority code” on contract forms. The Licensee has taken corrective action to materially remedy these deficiencies.
- The Licensee and its direct corporate parent timely filed 2015 Biennial Ownership Reports. The “parent” reports for the trusts through which the holders of the direct corporate parent’s voting interests are held were not filed until January 2016, approximately one and one-half months late.

Otherwise, the Licensee has materially complied with 47 C.F.R. § 73.3526.

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