## <u>Certification Regarding Compliance with</u> Section 73.3526 of the FCC's Rules During the Preceding License Term

The Applicant acquired the station on September 3, 2014 pursuant to a long-form application on FCC Form 314, and its certifications only cover the period during which it has held the station's license. Upon review of its Public Inspection File to determine whether documentation required by Section 73.3526 of the FCC's Rules has been uploaded when required, Applicant found that:

- While Applicant retains a list of all documents required to be disclosed under Section 73.3613 in its Public Inspection File, some documents were not added to the station's Section 73.3613 list (or, alternatively, uploaded) within 30 days after execution. An updated Section 73.3613 list was included in the station's most recent biennial ownership report and Applicant has uploaded a supplemental list to its Public Inspection File to account for relevant documents executed since then and not already listed in the ownership report.
- The annual Equal Employment Opportunity Report for 2014, due on December 1, 2014, was uploaded on March 19, 2015.
- The Commercial Limits Certification for Third Quarter 2014 was uploaded on July 6, 2015, and the Commercial Limits Certification for Third Quarter 2016 was uploaded on January 9, 2017.
- The Quarterly Issues & Programs List for Fourth Quarter 2015 was uploaded on April 6, 2016, and the Quarterly Issues & Programs List for First Quarter 2017 was uploaded on November 17, 2020 after discovering that the list originally uploaded on April 10, 2017 was for the wrong quarter.
- Some political file materials were not uploaded to the Public Inspection File within one business day of receiving the request for time.

Applicant will continue to remind station staff of Public Inspection File requirements and upcoming deadlines, will provide additional training to station staff, and will work to implement more robust accountability procedures to enhance the station's compliance with Public Inspection File deadlines going forward.

<sup>&</sup>lt;sup>1</sup> Applicant notes that the deadlines to file or upload certain documents, including the 2017 Biennial Ownership Report and the various Fourth Quarter 2018 certifications and reports, were extended due to government closures. See 47 C.F.R. § 1.4; see also Revisions to Filing and Other Deadlines Following Resumption of Normal Operations, Public Notice, DA 19-26 (rel. January 29, 2019). In addition, the deadlines to file the 2019 Children's Television Programming Report and to upload the Quarterly Issues & Programs List for First Quarter 2020 were extended due to the COVID-19 pandemic. See Media Bureau Announces Extension of Time for Broadcasters to File Children's Programming Reports and Quarterly Issues/Programs Lists, Public Notice, DA 20-353 (rel. March 27, 2020).