

**KTBS-TV
LICENSE RENEWAL FCC VIOLATIONS EXHIBIT**

KTBS, LLC (“applicant” or “KTBS”) has responded in the negative to the FCC violations certification that states: “Licensee certifies that, with respect to the station(s) for which renewal is requested, there have been no violations by the licensee of the Communications Act of 1934, as amended, or the rules or regulations of the Commission during the preceding license term.” The applicant therefore submits this explanatory exhibit to provide a complete description of the relevant violation.

The station employment unit for KTBS-TV and KPXJ(DT) (the “Station”) was selected for a random EEO Audit in February 2018. In light of the Station’s response, the Media Bureau issued an admonishment to the Station for failing to provide notification of each full-time vacancy to one organization that had requested such notice, as required by Section 73.2080(c)(1)(ii) of the FCC’s EEO Rules. *See* Letter from Martha Heller, Chief, Policy Division, FCC Media Bureau, to Edwin Wray, Managing Member, KTBS, LLC, and Frank Jazzo, Esq., Letter Decision, DA 18-760 (rel. July 26, 2018). Specifically, the applicant self-discovered and self-reported that it had failed to notify the local NAACP unit of four vacancies in 2017 and 2018 pursuant to an NAACP request the applicant had received 13 years earlier—back in 2005. However, as noted in the Bureau’s Letter Decision, the applicant notified the NAACP of the majority of full-time vacancies during the audit reporting period and the NAACP had not referred any applicants in the 13 years since its initial request for notification.

Accordingly, given the foregoing circumstances—i.e., that the applicant “self-reported its violation, notified the NAACP of 80% of its full-time vacancies during the audit reporting period, used numerous other sources to provide notice of all of its full-time vacancies during the reporting period, received numerous referrals for its vacancies, . . . otherwise demonstrated compliance with the EEO Rules,” and “notified the NAACP of 100% of its full-time vacancies in 2014, 2015, and 2016,” *id.* at 2—the Media Bureau admonished the licensee.