

WUPL

License Renewal Application Public Inspection File

Between 2015 and 2017 documents required to be uploaded into the station's Online Public Inspection File (OPIF) were removed and reloaded. For example, after the grant of 2013 license renewal application became a final order, the station removed documents from 2008 through 2016, but later audits of the OPIF, in 2017 and 2018, found that some of these documents were still required and the station reloaded them. Other documents were uploaded to the incorrect folders and were deleted and reloaded into the correct folders prior to the 'move' tool became available. A few documents were deleted and replaced with amended versions. It is believed that each of these documents was originally timely uploaded. In addition, the upheaval caused by the sudden implementation of teleworking and new procedures in response to the COVID-19 Pandemic resulted in several late uploads in 2020.

With respect to the station's political file, it is the station's policy and practice to upload new and revised orders to its political file as soon as possible once an order or change has been accepted and processed. During periods of especially high activity, some political file updates may be delayed, particularly with respect to information revising ongoing orders or reconciling completed orders. Station personnel are available to answer questions from the public regarding any revision or reconciliation information not yet reflected in the station's political file. An internal audit of the station's political file, which was conducted in connection with the preparation of this renewal application and completed as of January 22, 2021, identified various orders that appeared to be missing or that had not been timely uploaded. All missing orders have now been uploaded to

the station's political file. The station also has provided additional guidance to sales staff and has revised its internal processes and staffing for maintaining the political file.