

STATEMENT AS TO PUBLIC INSPECTION FILE RULE COMPLIANCE

The applicant wishes to advise the Commission that it has, in preparing its renewal application, determined it has not been as diligent as required in the process of uploading and maintaining its online public inspection file during the renewal period.

In connection therewith, the applicant has determined that errors had occurred in the timely uploading of its quarterly compliance with the Commission's issues/programs requirements and, in one instance, in regard to its political broadcasting agreements.

The applicant has determined that the following Issues/Programs reports were not timely uploaded: Q4 of 2018, Q3 and Q4 of 2019, and Q1, Q2, and Q3 of 2020. The applicant is a single station licensee in a small radio market. It has limited employee resources and there are times when its staff is overwhelmed with work and actions are delayed. The applicant is implementing new procedures in order to ensure better compliance with the uploading requirements.

As a small market station, KJCS rarely receives candidate purchases of time. In 2018, it received a total of three political broadcasting time requests. In reviewing its public inspection file, the applicant believes that one of the requests was not uploaded as soon as possible. The applicant understands that de minimis uploading delays are not actionable errors and the applicant intends to upload future political broadcasting time requests, should it receive them, on the required as soon as possible basis.

The applicant submits that the change from a paper file to an online one has altered routines at its Station, which, as noted, is a small market station with a limited staff. The applicant and its minimal staff are learning the necessary procedures, which pose difficulties for them because they do not have the benefit of a large staff. This problem has been compounded

by the pandemic, which has caused difficulties for most radio stations as they are forced to reduce staff, deal with work from home practices, and face complications owing to illness on the part of employees and their families.

The Commission has recognized that, in this round of license renewals, the Commission's interest is in having online public inspection files be accurate as of the license renewal date. To that end, the Commission has announced that it is only where public inspection file compliance is not effectuated by the "deadline for filing a station's renewal application" will that failure result in any impact or adverse action involving the renewal application. *Public Notice*, 34 FCC Rcd 1344 (MB 2019). The applicant submits that this is an appropriate policy that should be applicable to the applicant in this instance.