

VilleCom LLC
Application for License Renewal
KCOM(AM), Comanche, TX (Facility No. 2866)

**EXPLANATION REGARDING DISCREPANCIES
IN PUBLIC INSPECTION FILE**

VilleCom LLC (“VilleCom”) acquired the above-referenced station (“Station”) on November 6, 2015. Since that time, the Station has provided listeners in Comanche, Texas and the surrounding areas with excellent public affairs programming aimed at diverse audiences, including news, weather, sports, emergency information and other important current events, as set forth on the Station’s quarterly issues/programs lists.

The Station’s online public inspection file (“OPIF”) is substantially up-to-date and complete. However, a cursory review of the Station’s OPIF might reveal the following minor issues with respect to the uploading of certain of the Station’s quarterly issues/programs lists:

- a. The report covering 4Q 2017 was not uploaded until February 19, 2021.
- b. The report covering 2Q 2019 (due on July 10, 2019) was not uploaded until September 24, 2019.

In response, VilleCom provides the following explanations:

- a. The report for 4Q 2017 was uploaded to KCOM’s “sister” station, KYOX(FM), Comanche, Texas, on time. However, the Station’s staff member in charge of preparing and uploading issues/programs lists received an “error” message from the Commission’s OPIF website when she tried to upload it at the proper time. Due to administrative oversight, the error was not corrected until recently.
- b. The report for 2Q 2019 was uploaded late, due to simple administrative oversight.

Importantly, VilleCom has not received any queries or complaints from any member of the public concerning its issues/programs lists or the extent of its public affairs programming. Indeed, as set forth herein, all of the reported errors were simply ministerial. VilleCom also has taken steps to ensure that, going forward, all issues/programs lists are uploaded to the Station’s OPIF at the prescribed dates/times.

In addition, on more than five occasions over the past two years, requests for political time were not uploaded within 24 hours of the Station’s receipt of those requests. Unfortunately, the staff member charged with ensuring that the uploads took place on time was advised, on doctor’s orders, to quarantine at home during the duration of the COVID-19 pandemic. Accordingly, he has not been able to visit the Station’s offices since March of 2020. VilleCom expects that staff member to be able to resume his normal work duties soon. Nevertheless, VilleCom has instituted new policies to ensure that all Station staff are aware of the requirement to upload requests for

political time within 24 hours of receipt, and will endeavor to ensure that there are no future violations (no matter how minor) of the Commission's rules governing maintenance of the Station's OPIF.