

Alpha Media Licensee LLC Debtor in Possession – KTSA Online Public File

In preparation for filing its license renewal applications, Alpha Media Licensee LLC Debtor in Possession (“Alpha”) has conducted audits of the online public inspection files at its radio stations. Having become aware of deficiencies with respect to the timely upload of political advertising information in certain markets, and as the Commission is aware, Alpha, with commitment at the highest corporate levels, redoubled the company’s efforts to train staff consistently and to implement company-wide operating procedures so as to ensure that requisite information is timely uploaded to the online public file in compliance with the Commission’s rules. Alpha submitted documentation of these efforts to the Commission in April 2020 and entered into a consent decree with the Commission on July 22, 2020. Alpha submitted a Compliance Report pursuant to the Consent Decree in December 2020. We note that while a careful review of the political file might suggest that certain issue ads for Americans for Tax Reform were not timely uploaded to the KTSA public file, these ads were included in network programming provided by Westwood One over which Alpha had no advance notice or control. We understand that Westwood One keeps its own network political file, and KTSA immediately uploaded material pertaining to these issue ads upon receipt.

A review of KTSA’s online public file revealed that it uploaded its Q3 2017 and Q1 2018 issues/programs lists one day late, its Q1 2019 list one month late, and its Q3 2018 list four months late. In all instances, the issues/programs reports were timely prepared. Having identified inconsistency with timely uploads to the online public inspection file, market management implemented training, a reminder system, and spot checks, which has resulted in improved compliance.

Alpha’s corporate executives continue to emphasize to each market the importance of appropriately maintaining the online public inspection file, and will carefully monitor compliance going forward.