

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 this renewal period.

In connection therewith, the applicant has determined that errors have occurred in the timely uploading of its compliance with Issues/Programs and political broadcasting agreements reporting in 2020.

Calendar year 2020 was a difficult time for the applicant as it was for radio stations in general. The Covid-19 pandemic constrained the applicant, which was faced with financial difficulties had to make due with a pared down staff that had to operate from him. Owing to the difficulties posed, the applicant was unable to comply with all of the public inspection file obligations in as timely a manner as required.

The applicant has re-educated itself as to its public file responsibilities during the preparation of its renewal application and is implementing new procedures in order to ensure better compliance with the uploading requirements.

The applicant submits that the change from a paper file to an online one has altered routines at its Stations, which, as noted, is a small market station with a limited staff. The applicant and its minimal staff are seeking to comply with 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.