

## Station WXYZ-TV Public Inspection File Documents

Station WXYZ-TV's online public inspection file is complete and it timely complied with the online file posting requirements except as follows:

### *Political File:*

Scripps makes extraordinary efforts to ensure that its stations comply with the FCC's directive that political purchase orders be uploaded to its stations' online political files in an easily accessible fashion "as soon as possible." Senior corporate staff are tasked with training local station sales personnel in Scripps' practices, and during times of significant political buying, Scripps hires additional corporate employees who are dedicated to monitoring its local stations' practices in real time and assisting them with compliance.

While a review of Station WXYZ-TV's online file suggests that sometimes an order's posting was not timely, review of the history of the station's political file activity shows that the station was often in fact adding material related to that order and deleting its previous filings documenting that order--as required to update or otherwise supplement the original order. During preparation of this license renewal application, WXYZ-TV also determined that a number of files from calendar year 2019 had been removed from the public file. While the station believes these files were originally uploaded in a substantially timely manner, it has now restored the removed files.

Nevertheless, Scripps is unable to certify that all of the many postings to the station's political file were originally made within a day of the order's receipt. Review of the past two years, including the history file, shows that in a relatively small percentage of the cases, reports were posted between one and five days late, and in a smaller number of cases, there were longer delays--almost all of ten days or less. These late uploads could have been due to issues such as delayed purchaser approval of a final order, Internet connection problems-- including difficulties accessing the FCC's online public file, or staff processing errors, and the station did not believe it necessary to make a contemporaneous note of such occurrences that were promptly remedied.

When Scripps discovers through its compliance and review processes that political file uploads at a station did not occur promptly under the circumstances, it has taken corrective action to ensure timely uploads going forward. Scripps certifies that it will continue to work with and monitor Station WXYZ-TV's political file practices to ensure that the station meets the FCC's political public file requirements.

### *Other Documents:*

WXYZ-TV believes that the station's EEO Public File Reports for 2015-2018, as well as the Issues and Programs List for the third quarter of 2015 were originally posted in a timely manner, but subsequently were removed and replaced with amended reports.