

FCC Form 303-S
Public Inspection File

KRCD(FM), Inglewood, CA (the "Station") believes that it has generally met the requirement in Section 73.1943(c) of the FCC rules to post political orders to the online public inspection file "immediately, absent unusual circumstances." The Station is not aware of any political spot for which it did not post information to the public inspection file. In an abundance of caution, the Station reports the following:

- In May and June of 2018, the Station received one candidate ad for Kevin de Leon for Senate, one non-candidate ad and one state candidate ad, however the Station did not upload the information until December 2019.
- In February 2020, the Station uploaded information for a candidate buy for Tom Steyer 7 days after the contract was finalized.
- In July 2020, the Station received NAB form for Associates LA Dept Sheriffs it was uploaded 40 days after it was received. In the case of CA for Responsible Housing the NAB was uploaded 26 days after it was received but before the flight dates.
- In August 2020, the Station received the NAB form for non-candidate buy No on Prop 15, it was uploaded 17 days after it was received, but before the flight dates.
- In September and October 2020, the Station timely uploaded NAB forms for 3 national issue ads and one local candidate ad. However, the Station did not upload the related contracts with additional information at that time. These contracts were uploaded during the 2021 review for license renewal.

Univision submits that the 2020 pandemic clearly is an "unusual circumstance" meriting regulatory relief from the Commission's normal interpretation of its posting requirement. The first known case of COVID-19 in California was reported before the end of January. That case, involving a traveler returning from Wuhan, China, was actually one of the earliest cases in the entire U.S. The second reported case in California was just a day later. In the first week of February, two planeloads of 350 Americans returning from China were quarantined in California.

A month later, following a number of emergency declarations in local jurisdictions, Governor Newsom declared a state of emergency, in California. On March 11, the Governor recommended that gatherings not exceed 250 people and extended paid family leave and disability benefits to those affected by COVID. The following week, more than 5.7 million California children in grades K-12 were sent home from school indefinitely. On March 13, the California Legislature passed \$1.1 billion in emergency coronavirus funding for ventilators, hospital beds and hotels. On March 19, with the number of reported cases continuing to grow, the Governor ordered California residents to stay home, subject to fines of up to \$1,000 and 6 months imprisonment for violations.

On March 6, President Trump signed a \$8.3 billion coronavirus relief bill, funding the development of a vaccine and treatment, providing loans for small businesses, and supporting state and local governments. The following week, President Trump declared a national emergency, freeing billions of dollars in federal funds for disaster relief and assistance. On March 22, the President declared a major COVID disaster in California.

On March 4, Los Angeles County declared a local emergency. A week later, Disneyland closed its Southern California parks. By the end of May, California reported over 3,200 new coronavirus cases, breaking the previous day's record, more than half of which were from Los Angeles County alone. On July 13, Governor Newsom ordered a number of types of businesses closed, including indoor dining and

bars.¹ That month, California reported 409,000 COVID-19 cases, surpassing New York for the most in the nation. And, by September, Hispanic and Latino Americans – Univision’s core audience -- comprised up to 60 percent of COVID-19 cases in the state.²

By the end of the year, California became the first state to record more than 2 million coronavirus cases and more than more than 23,000 Californians had died.³ To date, over 1,250,000 Covid cases have been reported in LA County, including over 24,000 deaths.⁴

Consistent with the Governor’s disaster proclamation, the Station directed all employees whose job function was not essential to the physical plant to work from home, including the Station employee charged with maintaining the Station’s public inspection file and the Station’s sales employees. Working from home during the pandemic made coordination between employees involved in political broadcast orders and employees charged with posting related paperwork more difficult. In addition, the Station was forced to take certain measures to blunt the severe economic impact of the pandemic, including employee furloughs.

Univision recognizes the importance of posting political information to the public file “immediately, absent unusual circumstances.” With the benefit of experience in dealing with the pandemic in Los Angeles, and despite ongoing resource challenges due to the pandemic, Univision has worked with its employees involved in the political sales process to emphasize the need for timely posting of relevant documentation even in adverse circumstances such as last year’s events.

¹ “Remember when? Timeline marks key events in California’s year-long pandemic grind,” Richard Procter, Cal Matters, March 4, 2021, Reviewed July 6, 2021, <https://calmatters.org/health/coronavirus/2021/03/timeline-california-pandemic-year-key-points/>

²“COVID-19 Pandemic in California,” Wikipedia, visited July 8, 2021, https://en.wikipedia.org/wiki/COVID-19_pandemic_in_California

³“Remember when? Timeline marks key events in California’s year-long pandemic grind,” Richard Procter, Cal Matters, March 4, 2021, Reviewed July 6, 2021, <https://calmatters.org/health/coronavirus/2021/03/timeline-california-pandemic-year-key-points/>

⁴ County of Los Angeles Public Health, Last Visited July 8, 2021, <http://publichealth.lacounty.gov/media/coronavirus/data/index.htm>