

FCC Form 303-S Online Public Inspection File

Station has confirmed that its online public inspection file currently contains an up-to-date list of contracts, in accordance with 47 C.F.R. § 73.3526(e)(5). Station's most recent Biennial Ownership Report (dated January 24, 2020) contained a list of contracts. In the course of preparing this Form 303-S, however, it was discovered that this list reflected two expired network affiliation agreements, and the list had not been separately uploaded as a standalone document to Station's online public inspection file. Upon discovering this issue, Station promptly posted an up-to-date list of contracts to reflect its agreements.

Station was delayed in uploading its annual EEO Public File Reports for certain periods, as required by Section 73.3526(e)(7) (EEO public file reports). Specifically, Station uploaded three reports between two and five months after the deadline. Station uploaded its report for the 2015-2016 period two months late, its report for the 2014-2015 period five months late, and its report for the 2013-2014 period three months late. During those periods, Station had a manual process for uploading the reports, but it has since implemented an automated system to ensure timely uploads.

On one occasion, Station did not timely upload its quarterly report as required under Section 73.3526(e)(11)(iii) (children's television programming reports). The report, which covered the third quarter of 2015, was uploaded two days late. Additionally, for the fourth quarter of 2016, Station indicated that the E/I Symbol did not air for certain episodes of core programming on Bounce TV stream due to a technical error. Bounce TV informed Station that it established new processes to ensure the technical issue does not recur and that the affected programs would be re-broadcast with the E/I symbol on Sundays for seven consecutive weeks.

Station's online public inspection file now contains up-to-date record of invoices disclosing information concerning candidates for public office, as required by 47 C.F.R. § 73.3526(e)(6) and 47 C.F.R. § 73.1943. However, Station discovered in the course of preparing this Form 303-S that Station had demonstrated a brief delay, typically less than one week, in uploading such invoices to its online public inspection file on various occasions during the license term. Station's online public inspection file now contains a full record of invoices concerning political candidates for the term of the current license.

Station takes seriously its obligations under the FCC's rules, including the online public inspection file rule, and it is taking steps to remedy and avoid any recurrence of the issues that caused the late filings disclosed above. Station is undertaking measures to ensure that all required documentation is uploaded to the online public inspection file by deadlines under the FCC rules and that all available documents remain up-to-date. Station has reviewed the filing requirements of Section 73.3526(e) with outside counsel, has reinforced those requirements with station staff, and has developed procedures with counsel to ensure updated materials are consistently uploaded by the relevant deadline. In particular, Station recently appointed a Director of Filing Compliance, and is creating a more robust calendar with filing deadlines and enhancing assistance from outside counsel to comply with and confirm the timely upload of all required documents and certifications.