

## **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 an expired network affiliation agreement, 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 reports for certain periods. Specifically, it uploaded three reports between two and nine months late. Station uploaded its report for the 2015-2016 period two months late, on September 29, 2016. Station uploaded its report for the 2014-2015 period five months late, on January 5, 2016. Station uploaded its report for the 2013-2014 period nine months late, on March 16, 2015. During those periods, Station had a manual process for uploading the reports, but it has since implemented an automated system to ensure timely uploads.

Station was delayed in uploading one quarterly Programs Issues Reports, for the first quarter of 2019. Station uploaded this report nine months late, on January 9, 2020, as the result of an administrative error. Station has complied with this requirement for all other periods for the term of the license.

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 at times during the license term demonstrated a delay in uploading invoices. 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.