

### **Public Inspection File**

Despite its substantial compliance with regard to the timely uploading of required documentation to the Station's Online Public Inspection File ("OPIF"), the Licensee has, out of an abundance of caution, responded in the negative with respect to the certification that states: "Licensee certifies that the documentation required by 47 C.F.R. § 73.3526 or 73.3527, as applicable, has been uploaded to the station's public inspection file as and when required." The Licensee in the instant exhibit provides relevant context regarding the Station's Online Public Inspection File during the pertinent time period.

- There are multiple documents that may appear to have been uploaded late based on their date/time stamp that were, in fact, timely uploaded to WIFS's OPIF. These include the following:
  - Two government shutdowns affected the accessibility of WIFS's OPIF (and all other OPIFs) for upload purposes. The issues/programs list for fourth quarter 2018, and the children's commercial time limits certification records for fourth quarter 2018 appear to have been uploaded late; however, they were timely uploaded once the respective government shutdown is taken into account.
- A handful of quarterly reporting documents were uploaded late. The Licensee understands that it is ultimately responsible for compliance with the Commission's Rules. It wishes to note, however, that most of the late uploads coincided with turnover with respect to the Station personnel who were assigned to handle quarterly reporting duties (primarily in the April-July 2016 period). The following quarterly reporting documents were not timely uploaded: children's television programming reports, issues/programs lists and children's commercial time limits certifications for fourth quarter 2015 and first quarter 2016; issues/programs list and children's commercial time limits certification for fourth quarter 2016; and issues/programs lists for second and third quarter 2017 and first quarter 2019. With respect to the three commercial time limits certifications that were not timely uploaded, the Licensee did not air during the applicable quarters any programming targeted to children ages 12 and under; as such, no one was prejudiced or materially affected as a result of the timing of such uploads. In addition, the Licensee notes that some of the reports mentioned here were uploaded within short periods after the upload deadline. Specifically, the first quarter 2016 children's television programming report was uploaded three days late; the second quarter 2017 issues/programs list was uploaded two days late; and the third quarter 2017 and first quarter 2019 issues/programs lists were uploaded just one day late.
- In the course of preparing the instant license renewal application, the Licensee realized that, despite conducting widespread recruitment for full-time positions and participating in EEO outreach activities, it failed to create and timely upload EEO annual reports for the 2013-14 and 2014-15 reporting periods. The Licensee did maintain in its internal records and systems the information that would have been used to timely produce those reports; the Licensee has now produced and uploaded them. The Station had fewer than

five employees during the other reporting periods (2018-19, 2019-20, 2020-21) for which it did not upload an EEO Annual Report.

- The Licensee wishes to note that it did not air any political advertisements during the last two years.

\* \* \* \* \*