

**Certification Regarding Compliance with  
Section 73.3526 of the FCC's Rules During the Preceding License Term**

Upon review of its Public Inspection File to determine whether documentation required by Section 73.3526 of the FCC's Rules has been uploaded when required,<sup>1</sup> Applicant found that:

- While Applicant retains a list of all documents required to be disclosed under Section 73.3613 in its Public Inspection File, some documents were not added to the station's Section 73.3613 list (or, alternatively, uploaded) within 30 days after execution. An updated Section 73.3613 list was included in the station's most recent biennial ownership report and Applicant has uploaded a supplemental list to its Public Inspection File to account for relevant documents executed since then and not already listed in the ownership report.
- The Commercial Limits Certification for Fourth Quarter of 2017 did not include a list of programs aired during the quarter that were designed for children 12 years of age and younger. The station has uploaded an amended certification to its Public Inspection File.
- The Quarterly Issues and Programs Lists ("QIP") for the Fourth Quarter of 2016, due on January 10, 2017, was uploaded on January 11, 2017. The QIP for the Second Quarter of 2019, due on July 10, 2019, was timely uploaded but the station later discovered that the upload did not complete and remained in pending status. Immediately upon discovering this issue, the station uploaded its Second Quarter 2019 QIP on January 23, 2020.
- The 2015-2016 Equal Employment Opportunity Report, due on June 1, 2016, was timely prepared but uploaded on September 21, 2016.
- Some political file materials were not uploaded to the Public Inspection File within one business day of receiving the request for time.

Applicant will continue to remind station staff of Public Inspection File requirements and has provided, and will continue to provide, additional training to station staff and has worked to implement additional accountability procedures to enhance the station's compliance with Public Inspection File deadlines going forward.

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<sup>1</sup> Applicant notes that the deadlines to file or upload certain documents, including the 2017 Biennial Ownership Report and the various Fourth Quarter 2018 certifications and reports, were extended due to government closures. *See* 47 C.F.R. § 1.4; *see also Revisions to Filing and Other Deadlines Following Resumption of Normal Operations*, Public Notice, DA 19-26 (rel. January 29, 2019).