

KTTW Online Public Inspection File Certification/ Rule Violation Exhibit

During its most recent license term, Station KTTW(TV) did not fully comply with certain online public inspection file (OPIF) requirements as provided in Section 73.3526 of the Commission's rules.¹ In particular, there were late filings of Children's TV Commercial Limit Certifications, Children's TV Programming Reports, Issues/Program Lists, Political File advertisement purchases, and one Annual EEO Report.

The licensee, Independent Communications, Inc., appreciates its obligation to fully comply with the Commission's rules, including all deadlines for uploading required material to KTTW's OPIF. These errors were discovered as part of a review in preparation for the filing of this renewal.

In regards to Political Files, while Independent understood that it was to upload political materials in a timely manner, it did not understand that the FCC intended that such materials be uploaded within 24 hours. Some political files were not uploaded within the time frame recently articulated by the FCC. The Licensee now understands the FCC's position and is committed to complying with the upload of required political materials within 24 hours/one business day of a request to purchase broadcast time.

In regards to EEO filings, Station KTTW currently has fewer than five full-time employees and thus is currently not required to maintain an EEO program or prepare annual EEO Public File Reports. During much of the past license term, however, Station KTTW did have five or more full-time employees, and it prepared and posted Public File Reports. During that time, the sections of each Public File Report concerning recruitment and hiring were prepared as separate documents from the sections concerning general outreach activities not linked to specific job openings. Taken together, the two documents for each year constituted the public file report, but these documents were not necessarily posted in the online public file at the same time. In years in which a report concerning hiring and recruitment was not prepared, that is because there were no hires during that year, and there was therefore nothing to post. During the most recent license term, all of the reports concerning general EEO outreach initiatives were posted prior to the deadline, with the exception of the report for 2015, which was posted on February 29, 2016. There were no hires to report that year. Additionally, the hiring and recruitment portions of the reports for 2016, 2017, and 2019 were posted late, with the 2016 and 2017 reports posted on March 23, 2018, and the 2019 report posted on January 20, 2020. The remaining portions of each of these online public file reports was posted prior to the posting deadline.

In regards to Children's TV Programming Reports, while four were filed late – 2014 4Q, 2015 2Q, 2015 4Q and 2016 1Q, due to the dates of weekends, 2014 4Q was filed only one day late, and 2015 2Q was filed only one business day late.

In regards to Children's TV Commercial Limit Certifications, while many were filed late, it should be noted that all of them were in fact filed. Most recently, it was discovered that the certifications for 2019 and 2020 were timely prepared, but inadvertently not filed. Accordingly, they were filed on November 17, 2021.

¹ 47 C.F.R. § 73.3526 *et seq.*

FCC Form 2100 – Schedule 303-S
Online Public Inspection File Exhibit

In regards to Issues/Program Lists, only one was filed late – 2016 3Q was timely prepared but inadvertently not filed in 2016, so it was filed on November 17, 2021.²

More broadly, the station employees who have the responsibility for preparing and maintaining the documentation required to be uploaded to the station's online public file, have been instructed regarding the FCC's requirements with respect to these matters, and have implemented calendaring procedures to ensure that the required documentation will be placed in the Station's OPIF in a timely manner going forward.

² The Issues/Programs Lists for 2019 2Q and 3Q were timely filed, but on November 17, 2021, were re-uploaded as PDFs since the original upload as a WORD document failed to properly convert.