

### Form 397

The station's FCC Form 397 (EEO Mid-Term Report) for the license term was not filed and uploaded to the station's online public inspection file ("OPIF"). The Commission eliminated the requirement to file Form 397 in 2019 (MB Docket 18-23).

### Public File

The station did not upload certain issues and programs lists to its OPIF within ten days after the end of the relevant quarter as required by FCC rules.

The station did not upload certain EEO Public File Reports to its OPIF by the relevant anniversary dates of filing of its license renewal application as required by FCC rules.

The station did not upload political advertising materials to its OPIF in a timely manner as required by FCC rules.

With respect to the failure to upload documents to the OPIF as described above, the licensee maintained these materials in a traditional paper public file located at the station's main studio in the market where the station is located. The licensee realized while preparing this renewal application that those materials had not been uploaded to the OPIF as required by FCC rules, and promptly following such realization uploaded the documents prior to filing this application. The licensee is aware of no complaints that were made by any persons unable to access materials in the OPIF during the license term.

Because the station is not in a radio market ranked in the top 50 by Nielsen, it was not required to move its public file online until March 1, 2018. Because the station maintained a paper file until, and after, March 1, 2018, to the best of the licensee's knowledge it was in substantial compliance with its public file obligations prior to that date, and the public file materials were available to anyone seeking them at the station's main studio. The licensee regrets its failure to upload materials to the OPIF in a timely manner and has consulted with counsel to improve its compliance in this regard in the future.