

### **Online Public Inspection File**

The Licensee has certified in the negative to the question asking whether the documentation required by 47 C.F.R. § 73.3526 has been uploaded to the station's public inspection file when required.

The Licensee discloses the following circumstances related to the KVIA-TV online public inspection file (OPIF):

- 2015 Biennial Ownership Report. Please refer to the Biennial Ownership Report exhibit related to the late-filed 2015 Biennial Ownership Report for “parent entity” trusts. The Licensee's and its direct corporate parent's Reports for 2015 were timely filed and all beneficial owners were timely disclosed.
- Limited Delayed Commercial Certification Records. The annual Children's Commercial Limits Certification for 2020 was uploaded two (2) days late.
- Political File. With respect to political file records required by 47 C.F.R. § 73.3526(e)(6) and §73.1943, the Licensee reports as follows:
  - Some Delayed Political File Uploads. On some occasions throughout the relevant period, the Licensee was delayed by several days or weeks in uploading political file orders. The Licensee is cognizant that these time periods for orders and NAB disclosure forms do not meet the Commission's immediacy expectations. The Licensee respectfully urges the Commission to view these matters against the context of the COVID-19 pandemic. This is not a case where political file obligations were forgotten or dismissed. Rather, the Licensee observes that the 2020 General Election was the highest volume of political activity the station has experienced in memory. In addition to the surge in political activity and resulting significant increase in political file records, station personnel responsible for the political file were working remotely due to the pandemic, and, as such, their workflow routines and processes were disrupted.
  - Class of Time. In a number of cases, the Licensee uploaded Wide Orbit *contracts* that disclosed pertinent details for political orders but did not include the class of time for the order; Wide Orbit *order* forms used by the station generally print with a P-code that corresponds to the class of time sold by KVIA-TV. The Licensee took corrective action in March 2022 by uploading missing order forms for the relevant period and, for 2021 and 2022, additional descriptive

information about the classes of time for the political advertising sold.

Otherwise, the Licensee wishes to explain the following circumstances, which may at first appear to, but do not in fact, impact the timeliness of uploads:

- The Fourth Quarter 2018 Issues/Programs Report was timely uploaded to the OPIF once the federal government reopened after shutdown.
- The 2019 Annual Children's Television Programming Report was timely filed and the First Quarter 2020 Issues/Programs Report was timely uploaded to the OPIF pursuant to a blanket extension granted by the Media Bureau related to the COVID-19 pandemic.

The Licensee acknowledges the few inadvertent departures from the public file timeliness requirements described herein and respectfully submits that the circumstances described in this exhibit should not negatively impact a determination of KVIA-TV's overall compliance during the license term.

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