

FCC Form 303-S
Online Public Inspection File Certification Exhibit

Station can confirm that it timely completed and uploaded each required EEO Public File Report during the period covered by this FCC Form 303-S for license renewal. However, the 2014-15 EEO Report and 2015-16 EEO Report were inadvertently taken down on January 4, 2018 due to a miscommunication among Station staff about which older EEO Reports to remove from the online public inspection file. The 2015-16 EEO Report was immediately re-uploaded the next day, on January 5, 2018. Station did not discover that the 2014-15 EEO Report had not been re-uploaded until September 14, 2018, at which point it promptly re-uploaded this report.

Station's online public inspection file contains an up-to-date record of invoices disclosing information concerning candidates for public office, as required by 47 C.F.R. § 73.3526(e)(6) and 47 C.F.R. § 73.1943. Station's close review of the online public inspection file in preparation for this renewal application confirmed the timely posting of invoices in compliance with the FCC's rules and policies. For clarity, Station flags two points with respect to its invoices. First, Station notes that the "Invoice Date" on the first page of its invoices refers to the day the final billing log was posted rather than the date the invoice was issued; the date each invoice was issued is located on the last page of the invoice with the balance as of date information. Second, Station discovered that in 2021 it had inadvertently uploaded three invoices for state issue advertisements, even though the Commission's rules do not require such uploads. While those uploads occurred some time after the ads aired, they do not represent any noncompliance with the Commission's rules given that the rules do not require such uploads.

Station takes seriously its obligations under the Commission's rules, including the online public inspection file requirements. Accordingly, Station is taking steps to ensure that materials are uploaded to the online public inspection file in accordance with applicable deadlines and maintained in the public file for the required time period. In particular, Station has reviewed the filing requirements of Section 73.3526(e) with outside counsel and Station staff, and it will follow protocols so that up-to-date materials are consistently uploaded by the relevant deadline and maintained for the periods required.