

KUEW-TV

FCC Form 303-S Online Public Inspection File

In an abundance of caution, Station notes that its online public inspection file currently contains an up-to-date list of contracts in accordance with 47 C.F.R. § 73.3526(e)(5). Station's most recent Biennial Ownership Report (dated November 22, 2021) contained a list of such contracts; however, this list had not been separately uploaded as a standalone document to Station's online public inspection file. Station promptly remedied this issue upon its discovery.

Station was delayed on occasion in uploading on its TV issues/programs lists report, as required by 47 C.F.R. § 73.3526(e)(11)(i). Station discovered in the course of preparing this Form 303-S that Station uploaded fourteen quarterly TV issues/programs lists from the third quarter of 2014 to the fourth quarter of 2019 between on day and several months late. This coincided with Station contracting with a third-party company to provide certain programming functions, including the compilation of Station's quarterly reports. In addition, on one occasion Station did not timely upload its annual EEO report, as required by § 73.3527(e)(6). Station discovered it uploaded the 2014-15 EEO Report five days late. In October 2020, Station asked outside counsel to conduct a detailed review its online public inspection file and flag areas for attention to ensure compliance with the Commission's rules. Since that review, Station has timely uploaded all public file materials and has developed procedures to ensure its materials are consistently uploaded by the relevant deadlines. In the case of quarterly reports, Station has developed workflows to ensure that the deadlines are communicated with sufficient notice to ensure Station staff have enough time to review, correct as necessary, and upload by the quarterly deadlines.

Station confirms that it maintains an up-to-date donor list, as required by 47 C.F.R. § 73.3527(e)(9). Station discovered in the course of preparing this Form 303-S that it regularly uploaded donor lists during the period covered by this FCC Form 303-S until October 2021. For clarity, there have been no changes to Station's donors since the most recent upload. Although Station stopped regularly uploading donor lists, it does not represent any noncompliance with the Commission's rules given that the rules only require that Station maintain an up-to-date list.

Station takes seriously its obligations under the Commission's rules, including its online public inspection file requirements. Consistent with its October 2020 review of its online public inspection file, Station is taking steps to ensure that materials are uploaded to the online public inspection file in accordance with applicable deadlines. In particular, Station has reviewed the filing requirements of Section 73.3526(e) with outside counsel and Station staff, and it will continue to follow protocols so that up-to-date materials are consistently uploaded by the relevant deadlines.