

FCC Form 303-S
Public Inspection File

The Station completed its 1st quarter 2017 issues/program list in a timely manner but inadvertently uploaded the report on July 8, 2017, when the error was discovered. The station completed the 1st quarter 2022 issues/program list in a timely manner but uploaded the report a few minutes after 11:00 PM Mountain Time Zone which is past the Eastern Time Zone FCC deadline.

KFTU-DT, Douglas, AZ (the "Station") believes that it has generally met the requirement in Section 73.1943(c) of the FCC rules to post political orders to the online public inspection file "immediately, absent unusual circumstances." The Station is not aware of any political spot for which it did not post information to the public inspection file. In an abundance of caution, the Station reports the following:

- In June 2020, the Station uploaded information for two non-candidate issue ads, one for Taxpayers Protection Alliance and the other for Advancing Arizona, 7 days after the contracts were finalized.
- In July 2020, the Station uploaded information for six non-candidate issue ads between 13 to 48 days after the contracts were finalized.
- In August 2020, the Station uploaded information for a candidate buy for Donald Trump, 4 days after the contract was finalized but before the end of the flight dates.
- In August 2020, the Station uploaded information for 10 contracts for candidate Mark Kelly for Senator between 6 and 43 days after contracts were finalized.
- In September 2020, the Station received information for 3 non-candidate buys for American Federation of State County and Municipal Employees International Union in advance of the flight dates. The information was uploaded between 9 and 17 days after the contracts were finalized.

TelevisaUnivision submits that these periods coincided with a significant surge in the COVID-19 Pandemic in Arizona following an early elimination of the mask requirement.¹

On June 1, 2020, the state reported a record high of 1,099 hospitalizations that were suspected to be COVID-19 related. Just a week later, there were over 27,000 cases and over 1,000 known deaths, and Dr. Cara Christ, the Arizona Department of Health Services director, warned hospitals to 'fully activate' emergency plans. On June 29, Governor Ducey ordered bars, movie theaters, and gyms to close again in a partial reversal of the state's reopening. On June 30, 2020, Phoenix and 8 other cities in the metropolitan area announced the cancellation of their fireworks displays.

On July 3, 2020, over 90% of licensed intensive care unit hospital beds were unavailable in Arizona. On July 9, as the death toll reached 2,000 and the total number of cases passed 112,000, Governor Ducey issued an executive order directing restaurants to restrict dining capacity. On July 23, the governor issued

¹ COVID-19 pandemic in Arizona, https://en.wikipedia.org/wiki/COVID-19_pandemic_in_Arizona; see also How Arizona's COVID-19 pandemic unfolded: A timeline, [Hannah Foote/Cronkite News](https://cronkitenews.azpbs.org/2020/07/13/how-arizonas-covid-19-pandemic-unfolded-a-timeline/), July 13, 2020, <https://cronkitenews.azpbs.org/2020/07/13/how-arizonas-covid-19-pandemic-unfolded-a-timeline/>

an executive order extending the temporary closure of certain businesses and prohibiting organized gatherings of more than 50 people.

To be clear, TelevisaUnivision recognizes the importance of posting political information to the public file “immediately” absent unusual circumstances. With the benefit of experience in dealing with these unusual circumstances, Univision has worked with its employees involved in the political sales process to emphasize the need for timely posting of relevant documentation even in adverse circumstances such as this year’s events.