

## **LICENSE RENEWAL EXHIBIT**

### *Limited Licensee Ownership Period*

The applicant acquired K04QP-D (the “Station”), Casa Adobes, AZ, on August 2, 2021, as authorized in FCC File No. 0000145325. Accordingly, the scope of the applicant’s responses in the accompanying application is limited to the period commencing on August 2, 2021.

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### *Online Public Inspection File / Class of Time and a Few Political File Records*

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 K04QP-D’s online public inspection file.

The Station receives an extremely high volume of political advertising activity each year, with the number of corresponding political files generated and uploaded to the Station’s online public inspection file (“OPIF”) stretching into the thousands in any given general election year. Throughout the relevant period, the applicant timely both generated and uploaded to the online political file the majority of required political file records. However, during the transition period from the Station’s prior ownership to its current ownership and the concomitant personnel and operational changes, station personnel inadvertently failed to “immediately” upload records in a few instances. The Licensee respectfully urges the Commission to view these matters not just within the context of the change in station ownership, but also against the context of the COVID-19 pandemic, which caused Station personnel responsible for the political file to be out of the office, and, consequently, to have their workflow routines and processes disrupted. The Licensee further respectfully submits that—when viewed within the context of the station’s overall political file recordkeeping compliance—these few upload delays are *de minimis* and do not materially affect the Licensee’s aggregate compliance with the political file recordkeeping rule.

Additionally, in the course of preparing the accompanying license renewal application the Station discovered that the third-party ad sale group historically used by the prior licensee and currently used by the Station for the majority of its political advertising did not generate Order forms displaying “Priority Code” information. As a result, during the relevant period the documentation placed in the political file often did not expressly demonstrate the class of time purchased. However, the Station does—and during the relevant period, did—routinely provide information regarding the Station’s available classes of time to potential buyers making political advertising inquiries. The Station has now addressed the issue such that going forward all documentation placed in the political file will indicate the class of time being purchased.