

Station KASW Public Inspection File Documents

Scripps acquired Station KASW pursuant to a long-form assignment of license application on September 19, 2019 (*See* BALCDT-20190403ABL) and accordingly, this response covers only the period of time beginning on that date. Station KASW's online public inspection file is substantially complete and during the period of time covered by this response, it timely complied with the online file posting requirements except as follows:

Political File:

Scripps makes extraordinary efforts to ensure that its stations comply with the FCC's directive that political purchase orders be uploaded to its stations' online political files in an easily accessible fashion "as soon as possible." Senior corporate staff are tasked with training local station sales personnel in Scripps' practices, and during times of significant political buying, Scripps hires additional corporate employees who are dedicated to monitoring its local stations' practices in real time and assisting them with compliance.

While a review of Station KASW-TV's online file suggests that sometimes an order's posting was not timely, review of the history of the station's political file activity shows that the station was often in fact adding material related to that order and deleting its previous filings documenting that order--as required to update or otherwise supplement the original order.

Nevertheless, Scripps is unable to certify that all of the many postings to the station's political file were originally made within a day of the order's receipt. Review of the past two years, including the history file, shows that most orders as originally received were originally posted in a timely manner, although in some cases documentation was posted between one day and one week late, and in an even smaller number of cases, there were longer delays. Documentation of certain revisions to original orders was also posted late in a number of cases, sometimes experiencing longer delays. These late uploads could have been due to issues such as delayed purchaser approval of a final order, Internet connection problems-- including difficulties accessing the FCC's online public file, or staff processing errors, and the station did not believe it necessary to make a contemporaneous note of such occurrences that were promptly remedied.

When Scripps discovers through its compliance and review processes that political file uploads at a station did not occur promptly under the circumstances, it has taken corrective action to ensure timely uploads going forward. Scripps certifies that it will continue to work with and monitor Station KASW-TV's political file practices to ensure that the station meets the FCC's political public file requirements.