





### **Online Public Inspection File**

The Licensee has certified in the affirmative 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 hereby provides additional information and context related to certain components of KCOY-TV's online public inspection file (OPIF):

- **Fourth Quarter 2016 Timely Uploads When Applying Local Times.** KCOY-TV is licensed to and operates in Santa Maria, California, which is in the Pacific Time Zone—three (3) hours behind the Eastern Time Zone. The FCC's OPIF system date and time stamps file uploads using Eastern Time Zone data. The Fourth Quarter 2016 Issues/Programs Report and Certification of Compliance with Commercial Limits in Children's Programs each show a time stamp that appears to be one (1) day late on January 11, 2017; however, the time stamp shows that each file was uploaded just minutes after midnight Eastern Time. The files were timely uploaded on January 10, 2017, applying the local Pacific Time, which is the more relevant time to measure timeliness considering members of the viewing public live in the Pacific Time Zone. Screen captures taken from KCOY-TV's OPIF and inserted below show the Issues/Programs Report was uploaded at 12:09 a.m. ET on January 11 or 9:09 p.m. PT on January 10, and the Certification of Compliance with Commercial Limits was uploaded at 12:05 a.m. ET on January 11 or 9:05 p.m. PT on January 10.

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Name	Size	Date Uploaded
 <a href="#">4Q16 KCOY Quarterly Issues Report</a>	110.95 KB	01/11/2017 0:09 AM
 <a href="#">4Q16 KCOY Quarterly Issues Report (KKFX Rebroadcast)</a>	114.09 KB	01/11/2017 0:09 AM
 <a href="#">4Q16 KKFX QUARTERLY CERTIFICATE ON COMPLIANCE</a>	66.01 KB	01/11/2017 0:05 AM
 <a href="#">4Q16 KCOY CERTIFICATION OF COMPLIANCE</a>	50.96 KB	01/11/2017 0:05 AM

- **LMS Login and Filing Issues Related to Two Children's Television Programming Reports.** The First Quarter 2017 and Second Quarter 2017 Children's Television Programming Reports were filed one day late in each case. The brief First Quarter 2017 filing delay was due to repeated errors when attempting to login to the LMS system; however, the Report was promptly filed once access was gained. With respect to the Second Quarter

2017 Report, the LMS system was inaccessible for a period on the day of the filing deadline (July 10, 2022) when personnel were attempting to ensure the timely filing of the Report; again, the Report was promptly filed as soon as station personnel could do so the next day.

- Timely Upload Following Shutdown. The Fourth Quarter 2018 Issues/Programs Report and Certification of Compliance with Commercial Limits in Children's Programs were timely uploaded to the OPIF once the federal government reopened after shutdown.
- Political File Reconciliation Information. With respect to political file records required by 47 C.F.R. § 73.3526(e)(6) and §73.1943, during the relevant time period, the Licensee was not in the habit of uploading reconciliation information contained in station invoices to the OPIF. *See Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Second Report & Order, 27 FCC Rcd 4535 (2012), ¶ 57. In many cases there were no changes between the time of order and the time of air such that certain invoices disclosed no new information than had been previously disclosed (*e.g.*, no rebates, credits issued, or make goods). *See id.* As of late July 2022, the Licensee has uploaded invoices that were previously not present. Additionally, further detail concerning the station's timely disclosed classes of time sold was uploaded in July 2022.

The Licensee respectfully submits that the circumstances described in this exhibit should not negatively impact a determination of KCOY-TV's overall compliance with its public inspection file obligations during the license term.

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