

LICENSE RENEWAL EXHIBIT

Preceding License Term

The license for KCRA-TV, Sacramento, CA, was last renewed on January 16, 2015, in FCC File No. BRC DT-20140729ACV. Accordingly, the Licensee's responses in the instant application cover the period commencing on January 16, 2015.¹

FCC Violations During the Preceding License Term

While not an FCC violation as preliminary or finally determined by the Commission or the Commission's staff, out of an abundance of caution the Licensee wishes to note that the Licensee received an informal complaint concerning closed captioning and American Sign Language accessibility for COVID-19 updates provided by California's Governor Newsom. The Commission's staff sent KCRA-TV an Official Notice of Informal Complaint dated March 27, 2020, concerning this matter. The Licensee timely responded to the Notice and explained that there was no violation of Section 79.1 (or Section 79.2) of the rules. KCRA-TV established an open and effective dialog with the complainant and invited her to reach out to the station with any concerns about captioning. KCRA-TV is committed to providing access to all of its viewers, including the deaf and hard-of-hearing community, and the Commission has taken no further action on this matter.

Online Public Inspection File – Political File Records

While not a violation of the online public inspection file rule, out of an abundance of caution the Licensee wishes to note that it has not always "immediately" uploaded political files reconciliation records (*i.e.*, invoices). Such reconciliation documentation is not subject to the same "as soon as possible" requirement as other political file records.² As permitted by the Commission's policy, KCRA-TV makes station personnel available to answer questions about final reconciliation in person, by email, or over the phone, and places reconciliation documentation concerning the final disposition of political orders in its public file at a later date consistent with its business practices, which, in most cases is after final billing for an order is completed.

With respect to other political file records, although throughout the relevant period the Licensee timely both generated and uploaded to the online political file the majority of the required political file records, in the course of preparing the instant license renewal application and reviewing a representative sample of the station's political file records, the Licensee discovered that it inadvertently failed to upload records within one business day in some instances. These inadvertent oversights arose during the rare and

¹ See *Fox Television Stations, Inc.*, FCC 18-97, 33 F.C.C. Rcd. 7221, ¶ 32 (2018).

² *Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Second Report and Order, 27 FCC Rcd 4535, ¶ 57 (2012) (Stations may "place written documentation about the final disposition in the file at a later date consistent with business practices – usually when final billing is compiled for the purchaser on a monthly basis. This practice is permitted.").

unusual circumstances caused by the COVID-19 national and international pandemic,³ and the Licensee respectfully submits that under the circumstances, the Licensee uploaded political file materials “as soon as possible.”⁴ And, even if any inadvertent oversights were found to rise to the level of deficient compliance, viewed against the context of the station’s overall political file recordkeeping compliance—which spans in excess of 1000 uploads during the relevant period—the Licensee respectfully submits that the delays are *de minimus* and do not materially affect the Licensee’s aggregate compliance with the political file recordkeeping rule.

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³ Indeed, the Media Bureau has recognized that the rare and exceptional circumstances presented by the COVID-19 pandemic have impacted station operations and require regulatory compliance flexibility. *See e.g.*, DA 20-353, DA 20-376, DA 20-396, DA 20-398, and DA 20-1059.

⁴ 47 U.S.C. § 315(e)(3); 47 CFR § 73.1943(c).