

## LICENSE RENEWAL EXHIBIT

### *Preceding License Term*

The license for KQCA(DT), Stockton, CA, was last renewed on December 12, 2014, in FCC File No. BRC DT-20140729ACT. Accordingly, the Licensee's responses in the instant application cover the period commencing on December 12, 2014.<sup>1</sup>

### *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.<sup>2</sup> As permitted by the Commission's policy, KQCA 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 unusual circumstances caused by the COVID-19 national and international pandemic,<sup>3</sup> and the Licensee respectfully submits that under the circumstances, the Licensee uploaded political file materials "as soon as possible."<sup>4</sup> 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 700 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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<sup>1</sup> See *Fox Television Stations, Inc.*, FCC 18-97, 33 F.C.C. Rcd. 7221, ¶ 32 (2018).

<sup>2</sup> *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.").

<sup>3</sup> 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.

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