

LICENSE RENEWAL EXHIBIT

Biennial Ownership Reports

The Licensee and its direct corporate parent, News-Press & Gazette Company (“NPG”), timely filed 2015 Biennial Ownership Reports for KSBB-CD and associated authorizations. The “parent” Reports for the trusts through which the holders of NPG’s voting interests are held were not filed until January 2016, approximately one and one-half months late. The beneficial owners were timely disclosed. The Licensee respectfully submits that this brief delay in filing the trust entity Reports is not material to the Licensee’s overall compliance with 47 C.F.R. § 73.3615.

Online Public Inspection File

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 wishes to note the following with respect to the foregoing certification, and respectfully submits that despite its negative certification none of the following constitutes a material deficiency in the applicant’s overall OPIF compliance.

Throughout the license term the Licensee timely uploaded to its online public inspection file the overwhelming majority of required documentation. However, the Licensee experienced brief upload delays of equal to or less than one full business day in the case of the following three documents: Children’s Television Programming Report for Second Quarter 2017; Children’s Commercial Time Limit Certification for Fourth Quarter 2015; and the Station’s Issues/Programs List for Fourth Quarter 2015.¹ Additionally, the Licensee timely generated and maintained in the station’s physical file its Issues/Programs Lists for First, Second, and Third Quarter 2015; upon realizing that those Lists were only maintained in physical form, the Station promptly uploaded those Lists to the OPIF on January 12, 2016.

The Licensee respectfully submits that—when viewed within the context of the Station’s overall track record of timely OPIF uploads throughout the license term—the few foregoing issues are *de minimis* and do not materially affect the Licensee’s aggregate compliance with the OPIF rule. In particular, the few upload delays set forth above all occurred relatively early in the license term and were relatively minimal in duration. The Commission has previously granted renewal applications without sanction despite the disclosure of late-uploaded documents in greater or similar quantities to those at issue here. *See, e.g.*, LMS File Nos. 0000188502, 0000188302, 0000188346. And here there is no question that the Station serves its community with important,

¹ In the case of all but one of the foregoing documents, the relevant upload deadline fell after a weekend or holiday occurring on the 10th of the month. Put differently, the majority of the foregoing upload deadlines were atypical and fell outside of the Station’s typical operating procedures for timely uploading documentation by the 10th of the relevant month. The Licensee has reviewed its OPIF recordkeeping processes and is taking the necessary steps to ensure that timely OPIF uploads occur even in such “outlier” circumstances.

issue-responsive programming. Indeed, in late 2018 the Station was one of the first on the West Coast to undertake the expense and uncertainty of transitioning to ATSC 3.0² and used (and still uses) that transition to provide extensive local news programming, including live rolling coverage of local political events, and other public affairs and local interest programming.³

Finally, the Licensee notes that it has not aired any political advertising over the relevant 2-year period.

Given all the foregoing, the licensee respectfully submits that the isolated recordkeeping issues identified above are not material to the station's overall compliance with Section 73.3526 of the rules.

² See LMS File Nos. 0000058567 & 0000078400.

³ See, e.g., ATSC, *Road to ATSC 3.0: Spotlight Santa Barbara* (Nov. 1, 2018), <https://www.atsc.org/news/road-to-atsc-3-0-spotlight-santa-barbara/>.