

STATEMENT AS TO PUBLIC INSPECTION FILE RULE COMPLIANCE

The applicant wishes to advise the Commission that it has, in preparing its renewal application, determined it has not been as diligent as required in the process of uploading and maintaining a portion of its online public inspection file during the renewal period.

In connection therewith, the applicant has determined that errors occurred in the timely uploading of issues/programs lists and political advertising agreements.

The applicant has determined that Issues/Programs reports were not timely uploaded in Q4 of 2019 and Q4 of 2020. The applicant has recognized this problem and has arranged for additional training and supervision of the parties responsible so that no such late uploading will occur in the future.

The applicant has determined that a few political advertising orders were delayed in their uploading. During the 2020 election cycle, five state candidates' political advertising agreements were late uploaded between seven days and one month, four federal candidates' agreements were late uploaded by one to two days, and an issues advertisement was late uploaded by two days. During 2022, an issues advertisement was delayed in uploading by two days.

The Commission has recognized that, in this round of license renewals, the Commission's interest is in having online public inspection files be accurate as of the license renewal date. To that end, the Commission has announced that it is only where public inspection file compliance is not effectuated by the "deadline for filing a station's renewal application" will that failure result in any impact or adverse action involving the renewal application. *Public*

Notice, 34 FCC Rcd 1344 (MB 2019). The applicant submits that this is an appropriate policy that should be applicable to the applicant in this instance.