

**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, political advertising agreements, and EEO Public File Reports.

The applicant has determined that Issues/Programs reports were not timely uploaded in Q1 of 2017 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 political advertising orders were delayed in their uploading. During the 2020 election cycle, a federal candidate's political advertising agreement was late uploaded by two days and an issues advertisement was late uploaded by 12 days. A limited number of late uploadings has been recognized by the Commission as a *de minimis* violation of the political broadcasting rules.

The applicant has also determined that its 2014 EEO Public File Report was late uploaded.

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.