

## **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 KEYT-TV 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 affirmative 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. Out of an abundance of caution, the Licensee discloses the following circumstances related to the KEYT (the “Station”) online public inspection file.

KEYT broadcasts a modest amount of political advertising, and notes the following with respect to the corresponding political file records required by 47 C.F.R. § 73.3526(e)(6) and § 73.1943.

During the relevant time period, reconciliation information contained in political advertising invoices was not typically uploaded to the OPIF. *See Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Second Report & Order, 27 FCC Rcd 4535 (2012), ¶ 57. However, the Station does—and during the relevant period, did—provide information regarding the Station’s political advertising practices to interested parties making political advertising inquiries, including inquiries regarding reconciliation information. Additionally, in nearly all cases there were no changes between the time of order and the time of air such that reconciliation invoices disclosed no new information (e.g., no rebates, credits issued, or make goods). *See id.* As of the date of this filing, the Licensee is uploading invoices that were previously not present.

During the relevant time period, the Station timely generated and uploaded to the OPIF the overwhelming majority of required political file records. Nonetheless, in a handful of instances uploads of political advertising orders or certain information were slightly delayed. The Station respectfully urges the Commission to view these matters against the context of the COVID-19 pandemic, during which Station personnel responsible for the political file had reduced hours due to the pandemic or were out of the office, and, consequently, had their workflow routines and processes disrupted. As part of the license renewal process the Licensee has reviewed its political advertising recordkeeping practices and has implemented procedures to ensure continued timely uploads of all required information.

Finally, the Licensee experienced a brief delay in uploading its Children's Commercial Time Limits certification for Second Quarter 2015, which was uploaded in two parts, by mid-day on Saturday, July 11th and Monday July 13th, 2015, respectively. The Licensee respectfully submits that this brief upload delay of less than one full business day and encompassing one quarterly certification out of the entire eight-year license term is *de minimis* for purposes of the Licensee's overall online public inspection file compliance across the license term.

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The Licensee respectfully submits that—when viewed within the context of overall political file and online public inspection file recordkeeping compliance for the Station—the few foregoing issues are *de minimis* and do not materially affect the Licensee's aggregate compliance with the political file recordkeeping and online public inspection file rules.