

KUEN-TV

FCC Form 303-S Online Public Inspection File

In an abundance of caution, Station notes that its online public inspection file currently contains an up-to-date list of contracts in accordance with 47 C.F.R. § 73.3526(e)(5). Station's most recent Biennial Ownership Report (dated November 22, 2021) contained a list of such contracts; however, this list had not been separately uploaded as a standalone document to Station's online public inspection file. Station promptly remedied this issue upon its discovery.

Station was delayed on occasion in uploading on its TV issues/programs lists report, as required by 47 C.F.R. § 73.3526(e)(11)(i). Station discovered in the course of preparing this Form 303-S that Station uploaded four quarterly TV issues/programs lists from the second quarter of 2015 to the second quarter of 2018 between two and nine days late. Issues related to staff training and administrative support caused these delays. Staff responsibilities have since been reassigned with additional oversight by an operations manager and redundant checks in place to avoid issues like this in the future.

In October 2020, Station asked outside counsel to conduct a detailed review of its online public inspection file and flag areas for attention to ensure compliance with the Commission's rules. Since that review, Station has timely uploaded all public file materials and has developed procedures to ensure its materials are consistently uploaded by the relevant deadlines. Beginning in 2016-17, Station analyzed and redesigned reporting processes to improve timely delivery of reports with defined workflows, shared report schedules, contingency plans, and meetings to review and update processes. This effort is ongoing and iterative: analysis of the delayed quarterly TV issues/programs list in 2018 revealed issues that were addressed by reassigning responsibilities, increasing time margins, increasing deadline oversight, and refining contingency plans.

Station takes seriously its obligations under the Commission's rules, including its online public inspection file requirements. Consistent with its October 2020 review of its online public inspection file, Station is taking steps to ensure that materials are uploaded to the online public inspection file in accordance with applicable deadlines. In particular, Station has reviewed the filing requirements of Section 73.3526(e) with outside counsel and Station staff, and it will continue to follow protocols so that up-to-date materials are consistently uploaded by the relevant deadlines.