

**Certification Regarding Compliance with
Section 73.3526 of the FCC's Rules During the Preceding License Term**

Upon review of its Public Inspection File to determine whether documentation required by Section 73.3526 of the FCC's Rules has been uploaded when required,¹ Applicant found that:

- While Applicant retains a list of all documents required to be disclosed under Section 73.3613 in its Public Inspection File, some documents were not added to the station's Section 73.3613 list (or, alternatively, uploaded) within 30 days after execution. An updated Section 73.3613 list was included in the station's most recent biennial ownership report and Applicant has uploaded a supplemental list to its Public Inspection File to account for relevant documents executed since then and not already listed in the ownership report.
- The Quarterly Issues and Programs List ("QIP") for Fourth Quarter 2013, due on January 10, 2014, was uploaded on January 21, 2014. The QIP for First Quarter 2014, due on April 10, 2014, was uploaded on April 22, 2014. The QIP for Second Quarter 2014, due on July 10, 2014, was uploaded on July 14, 2014. The QIP for Third Quarter 2014, due on October 10, 2014, was uploaded on October 16, 2014.
- The Commercial Limits Certifications for First Quarter 2015 – Fourth Quarter 2017 were uploaded on July 28, 2020. The Commercial Limits Certification for First Quarter 2018 was uploaded on July 29, 2020.
- The Commercial Limits Certifications for First Quarter 2019 did not include a list of the programs aired during the quarter that were designed for children 12 years of age and younger. The station has uploaded amended certifications to its Public Inspection File.
- Some political file materials were not uploaded to the Public Inspection File within one business day of receiving the request for time.

Applicant will continue to remind station staff of Public Inspection File requirements and upcoming deadlines, will provide additional training to station staff, and will work to implement more robust accountability procedures to enhance the station's compliance with Public Inspection File deadlines going forward.

¹ Applicant notes that the deadlines to file or upload certain documents, including the 2017 Biennial Ownership Report and the various Fourth Quarter 2018 certifications and reports, were extended due to government closures. *See* 47 C.F.R. § 1.4; *see also Revisions to Filing and Other Deadlines Following Resumption of Normal Operations*, Public Notice, DA 19-26 (rel. January 29, 2019). In addition, the deadlines to file the 2019 Children's Television Programming Report and to upload the Quarterly Issues & Programs List for First Quarter 2020 were extended due to the COVID-19 pandemic. *See Media Bureau Announces Extension of Time for Broadcasters to File Children's Programming Reports and Quarterly Issues/Programs Lists*, Public Notice, DA 20-353 (rel. March 27, 2020).