

LICENSE RENEWAL EXHIBIT

Preceding License Term

The license for WMUR-TV, Manchester, NH, was last renewed on May 15, 2015, in FCC File No. BRCDDT-20141201AUC. Accordingly, the Licensee's responses in the instant application cover the period commencing on May 15, 2015.¹

FCC Violations During the Preceding License Term

While not an FCC violation as preliminary or finally determined by the Commission or the Commission's staff as having occurred during the preceding license term, out of an abundance of caution the Licensee notes that it was admonished by the Commission in a Memorandum Opinion and Order (FCC 19-100), released on October 16, 2019, in connection with a 2014 complaint concerning a political file record that pre-dated the Commission's grant of WMUR-TV's last license renewal in 2015. As noted in connection with that matter, the Licensee took corrective action and is keenly focused on compliance with the political file recordkeeping requirements.

Online Public Inspection File

While the Online Public Inspection File indicates that the Licensee's 2015 EEO Public Inspection File Report was not successfully uploaded until Thursday, December 3, 2015, at 12:07 PM, the Licensee submits that the report was timely filed. As noted in an e-mail to counsel dated December 1, 2015, the Licensee attempted to upload its 2015 EEO Public Inspection File Report to its Online Public Inspection File on November 30, 2015, at 1:39 pm, but that at that time, the file could not be viewed due to apparent technical issues with the FCC's systems. The Licensee reported the issue to the FCC's help desk, and the issue was corrected. The Licensee respectfully submits that the slight delay in the availability of the report, which was due to technical issues with the FCC's Online Public Inspection File system, did not prejudice the ability of the general public or the Commission to timely access and take account of WMUR-TV's 2015 EEO report.

Throughout the relevant period, the Licensee timely both generated and uploaded to the online political file the majority of the required political file records; however, in the course of preparing the instant license renewal application and reviewing a representative sample of the station's political file records, the Licensee discovered that it inadvertently failed to upload records within one business day in some instances. These inadvertent oversights arose during the rare and unusual circumstances caused by the COVID-19 national and international pandemic,² and the Licensee respectfully submits that under the circumstances, the Licensee uploaded political file materials "as soon as possible."³ And, even if any inadvertent oversights were found to rise to the level of deficient compliance, viewed against the context of the station's overall political file recordkeeping compliance—which spans in excess of 2,800 uploads during the relevant period—the Licensee respectfully submits that the delays are *de minimis* and do not materially affect the Licensee's aggregate compliance with the political file recordkeeping rule.

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¹ See *Fox Television Stations, Inc.*, FCC 18-97, 33 F.C.C. Rcd. 7221, ¶ 32 (2018).

² Indeed, the Media Bureau has recognized that the rare and exceptional circumstances presented by the COVID-19 pandemic have impacted station operations and require regulatory compliance flexibility. See e.g., DA 20-353, DA 20-376, DA 20-396, DA 20-398, and DA 20-1059.

³ 47 U.S.C. § 315(e)(3); 47 CFR § 73.1943(c).