

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 and political advertising agreements.

The applicant has determined that Issues/Programs reports were not timely uploaded in Q4 of 2020, Q4 of 2016, and Q3 and Q1 of 2015. 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 and 2022 election cycles, there were more than five instances in which political advertising orders were uploaded late.

In the remainder of the renewal period, between 2014 and 2020, there were 17 instances in which late uploading occurred.

Much of this problem is the result of prior employees of the Station that failed to carry out the uploading process in the manner required by the licensee. The licensee has placed a new management-level employee in charge of the Station's public inspection file, provided her with training and supervision, and is working with the employee to perform uploading of relevant public file materials under the time periods set by the Commission. The licensee is making every effort to ensure that there will be no further instances when items are not timely 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, where the public inspection file errors occurred early in the online transaction and are few in number.