

**WNYB, Buffalo, NY (Fac. Id. 30303)**  
**License Renewal Application**  
**OPIF Explanation**

Except for the following 3 late OPIF uploads, WNYB timely uploaded all required online public file items in a timely manner during the 8-year license term.

The WNYB children's television commercial limits certification was uploaded 2 days late for Q1 2016, 202 days late for Q3 2017, and 118 days late for Q3 2018. WNYB believes that the Q1 2016 late upload did actually occur two days late. However, for the Q3 2017 and Q3 2018 certification uploads, the OPIF history folder records stop in 2020 and it is therefore impossible to review what may explain those two certifications showing dates 202 and 118 days later than the upload deadline. The upload date for the Q3 2018 report is 2/5/2019, which is the same date as the Q4 2018 commercial limits certification upload (government shutdown extended the deadline to 2/8/2019). WNYB strongly suspects that during the Q4 2018 upload on 2/5/2019, an originally timely uploaded Q3 2018 certification was inadvertently overwritten or deleted, and then re-uploaded on 2/5/2019. For the Q3 2018 commercial limits certification, WNYB suspects that this certification was either (a) timely uploaded, inadvertently deleted and then re-uploaded at a later date, or (b) timely attempted, but for technical reasons the timely upload attempt failed and was not noted until later, and then immediately remedied. As WNYB's renewal application certification confirms, no commercial limits violations occurred during the license term, and therefore none were being reported in these three delayed certification uploads.