

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 an Issues/Programs report was not timely uploaded in Q2 of 2021. 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 a few political advertising orders was delayed in their uploading. During the 2020 election cycle, two federal candidates' political advertising agreements were late uploaded by five and eight days and an issues advertisement agreement was late uploaded by 14 days.. A limited number of late uploadings has been recognized by the Commission as a *de minimis* violation of the political broadcasting rules.

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.