

FCC Form 303-S  
Public Inspection File

WXFT, Aurora, IL (the “Station”) completed its 4<sup>th</sup> quarter 2013 issues/program list in a timely manner, but did not post that report until February 18, 2014. Although the Station completed its 1<sup>st</sup> and 2<sup>nd</sup> quarter 2014 issues/program lists in a timely manner, it did not post those reports until August 19, 2014, when this inadvertent error was discovered. Additionally, in 4 occasions the station inadvertently mislabeled the heading of the issue/program list with the call sign of sister station WGBO-DT, while the information in those reports was that of WXFT-DT.

The Station uploaded the commercial limits certification for 4<sup>th</sup> quarter 2013 on August 19, 2014.

In 2016, the Station inadvertently failed to upload the FCC clearance letter related to a Random EEO Audit. The error was discovered during the review for license renewal and the clearance letter uploaded at that time.

The Station believes that it has generally met the requirement in Section 73.1943(c) of the FCC rules to post political orders to the online public inspection file "immediately, absent unusual circumstances." The Station is not aware of any political spot for which it did not post information to the public inspection file. Out of an abundance of caution, the Station reports the following:

- In January 2019, the Station uploaded information regarding two candidate ads for Bill Daley for Mayor in one instance 10 and the other 67 days after the contracts were finalized.
- In January and February 2019, the Station uploaded information regarding two candidate ads for Friends of Edward M. Burke in one instance 20 and the other 6 days after the contracts were finalized.
- In February 2019, the Station uploaded information regarding one candidate ad for Susan Mendoza for Mayor 6 days after the contracts were finalized.
- In March 2020, the Station uploaded information regarding one candidate ad for Joe Biden 5 business days after the contract was finalized.
- Also, in March 2020, the Station uploaded information regarding two candidate ads for Bernie Sanders in one instance 13 and the other 16 business days after the contracts were finalized.

Univision submits that the pandemic clearly is an “unusual circumstance” meriting regulatory relief from the Commission’s normal interpretation of its posting requirement. The first reported case of a COVID-19 infection in Chicago, on January 24, 2020, was actually the second reported case in the entire United States. Days later, that patient’s husband was diagnosed with COVID, becoming the first known case of transmission by one person to another in the U.S. By mid-March, Illinois Governor J. B. Pritzker had issued a disaster proclamation, as the number of cases reported in the state had risen to double digits. The state closed all schools and colleges, ordered all bars and restaurants closed to sit-in diners, and restricted large gatherings of people. By mid-April the state had over 10,000 confirmed cases of Covid and 99 deaths. The state’s “shelter in place” restrictions were extended until the end of April and again until the end of May.<sup>1</sup>

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<sup>1</sup> COVID-19 Pandemic in Illinois, Wikipedia, July 6, 2021, [https://en.wikipedia.org/wiki/COVID-19\\_pandemic\\_in\\_Illinois](https://en.wikipedia.org/wiki/COVID-19_pandemic_in_Illinois)

Consistent with the Governor's disaster proclamation, the Station directed all employees whose job function was not essential to the physical plant to work from home, including the Station employee charged with maintaining the Station's public inspection file and the Station's sales employees. Working from home during the pandemic made coordination between employees involved in political broadcast orders and employees charged with posting related paperwork more difficult. In addition, the Station was forced to take certain measures to blunt the severe economic impact of the pandemic. From May 1, 2020 to July 31, 2020, approximately 66 Station employees were subject to these furloughs, including the individual responsible for maintaining the Station's public file.

Univision recognizes the importance of posting political information to the public file "immediately, absent unusual circumstances." With the benefit of experience in dealing with the pandemic in the Chicago metropolitan area, and despite ongoing resource challenges due to the pandemic, Univision has worked with its employees involved in the political sales process to emphasize the need for timely posting of relevant documentation even in adverse circumstances such as last year's events.