

In preparation for filing the instant renewal application, the licensee reviewed the public inspection file for WFCG-FM (FCC ID: 164264) (the “Station”) and found several issues, addressed below from October 25, 2019 through the present:¹

Political File – The licensee found certain inconsistencies in the timing and placement of political broadcasting materials in the online file. It is the Station’s practice to use the National Association of Broadcaster’s Political Advertising Agreement Forms (“NAB PB”) when requests for political advertising are made. Licensee noted instances where certain materials were not uploaded to the new online public file “as soon as possible” pursuant to Section 73.1943 of the Commission’s rules. For example, the invoices reflecting the schedule of actual time purchased (if applicable) and information regarding the rate charged and class of time purchased in some instances were uploaded late.

Licensee has investigated the cause of these issues and has determined that they were the result of miscommunication among Station personnel about the political file requirements, as well as a lack of clear policy and procedure at the Station for ensuring proper maintenance of the online political file. As a result, the licensee has taken effective steps to ensure full compliance with all online public file requirements, including specific training of staff responsible on the rules pertaining to the maintenance of the political file and establishing clear Station policy and procedure regarding proper file maintenance.

¹During the license term, Charles W. Dowdy, Debtor-in-Possession filed a long form application on Form 314 to assign the Station to North Shore Broadcasting Company, Inc. See BALH-20190912AAJ. The assignment was consummated on October 25, 2019. Accordingly, this exhibit includes information from October 25, 2019 to the present.