

**WUNP-TV  
LICENSE RENEWAL EXHIBIT**

*Online Public Inspection File*

The University of North Carolina (“applicant” or “UNC-TV”) has responded in the affirmative to the FCC online public inspection file certification (“OPIF”) that states: “Licensee certifies that the documentation required by 47 C.F.R. Section 73.3526 or 73.3527, as applicable, has been uploaded to the station’s public inspection file as and when required.” Out of an abundance of caution, the applicant wishes to note the following that may be relevant to the foregoing certification (none of which constitutes a material deficiency in OPIF compliance):

- **3Q 2013 & 4Q 2018 Issues/Programs Lists:** UNC-TV timely prepared its third quarter 2013 and fourth quarter 2018 Issues/Programs Lists prior to the Lists’ respective October 10, 2013, and January 10, 2018, upload deadlines. However, in both instances the OPIF system was offline and unavailable for uploads on the deadline as a result of a federal government shutdown.

The 2013 federal government shutdown lasted from October 1 to October 16, 2013. UNC-TV uploaded its third quarter 2013 Issues/Programs List on October 17, 2013—i.e., within 24 hours of the OPIF system being brought back online following the end of the government shutdown and well before the revised upload deadline established by the Commission. *See Revised Filing Deadlines Following Resumption of Normal Commission Operations*, Public Notice, DA 13-2025 (rel. Oct. 17, 2013).

The 2018–19 federal government shutdown lasted from December 21, 2018, to January 25, 2019, and the OPIF became unavailable on January 3, 2019. UNC-TV uploaded its fourth quarter 2018 Issues/Programs List on January 26, 2019—i.e., within 24 hours of the OPIF system being brought back online following the end of the government shutdown and well before the revised upload deadline established by the Commission. *See Revisions to Filing and Other Deadlines Following Resumption of Normal Commission Operations*, Public Notice, DA 19-26 (rel. Jan. 29, 2019).

Given the foregoing, the applicant’s third quarter 2013 and fourth quarter 2018 Issues/Programs Lists were not uploaded late, notwithstanding the fact that the date/time stamp for each may, at first glance, appear to suggest that they were.

- **4Q 2014 Issues/Program List:** UNC-TV timely prepared and uploaded its fourth quarter 2014 Issues/Programs List prior to the January 12, 2015,<sup>1</sup> upload deadline (the “Initial List”). However, in 2018, UNC-TV subsequently discovered that it had erroneously labeled the Initial List with the call letters of its sister station—WUNM-TV—whose Issues/Programs List for fourth quarter 2014 exactly mirrored that of WUNP-TV (because

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<sup>1</sup> January 10, 2015, was a Saturday, causing the upload deadline to shift to the next business day. *See* 47 C.F.R. § 1.4(j).

the two stations both rebroadcast the same programming generated by UNC-TV's flagship station, WUNC-TV). Accordingly, immediately upon discovering the mislabeled list UNC-TV uploaded an amended Issues/Programs List for WUNP-TV for fourth quarter 2014, bearing the correct station call letters (the "Amended List"). Although the licensee has since deleted the Initial List, the front page of the Amended List (reprinted below) demonstrates that the Initial List was timely uploaded.

#### WUNP-TV 4Q 2014 Issues/Programs List

The attached Issues/Programs List for WUNP-TV covers the fourth quarter 2014 reporting period from October 1, 2014 – December 31, 2014. As can be seen in the screen shot below, the licensee timely uploaded an Issues/Programs List for 4Q 2014 on January 8, 2015. However, the file that was uploaded for WUNP-TV was the same file that the licensee uploaded into co-owned WUNM-TV's online public file. This error was discovered during the third quarter 2018 quarterly filing process, and the correct 4Q 2014 Issues/Programs List for 4Q 2014 for WUNP-TV is being re-uploaded on October 10, 2018. Most significantly, the content of the 4Q 2014 Issues/Programs List for WUNM-TV is identical to the content of the 4Q 2014 Issues/Programs List for WUNP-TV because both stations air the same programming, as satellite stations of co-owned WUNC-TV. As a result, the requisite 4Q 2014 Issues/Programs List information has been in the WUNP-TV public file all along, albeit with an erroneous cover page.

WUNP Issues Pgm 2015 3rd qtr	113.72 KB	10/05/2015 4:48 PM
WUNP Issues Pgm 2015 2nd qtr	119.87 KB	07/02/2015 4:26 PM
WUNP Issues Pgm 2015 1st qtr	118.75 KB	04/08/2015 11:58 PM
WUNM Issues Pgm 2014 4th qtr	86.44 KB	01/08/2015 2:51 PM
WUNP Issues Pgm 2014 3rd qtr	97.79 KB	10/06/2014 4:27 PM
WUNP Issues Pgm 2014 2nd qtr	102.69 KB	07/06/2014 07:30 AM
WUNP Issues Pgm 2014 1st qtr	101.37 KB	04/02/2014 11:48 AM
WUNP Issues Pgm 2013 4th qtr	107.99 KB	01/06/2014 3:14 PM

Accordingly, the applicant respectfully submits that its fourth quarter 2014 Issues/Programs List was not uploaded late, notwithstanding the fact that the date/time stamp for the Amended List may, at first glance, appear to suggest that it was.

- **2Q 2016 Issues/Programs List:** UNC-TV timely prepared and uploaded its second quarter 2016 Issues/Programs List prior to the July 11, 2016,<sup>2</sup> upload deadline (the "Initial List"). However, several weeks later UNC-TV subsequently discovered a minor error in the Initial List and therefore uploaded an amended Issues/Programs List for second quarter 2016 (the "Amended List"). Although the licensee has since deleted the Initial List, as noted on the front page of the Amended List and as can be seen below, the OPIF's historical caching data demonstrate the timely upload of the Initial List. Accordingly, the applicant

<sup>2</sup> July 10, 2016, was a Sunday, causing the upload deadline to shift to the next business day. See 47 C.F.R. § 1.4(j).

respectfully submits that its second quarter 2016 Issues/Programs List was not uploaded late, notwithstanding the fact that the date/time stamp for the Amended List may, at first glance, appear to suggest that it was.

Deleted a file WUNP Issues Pgm 2016 2nd qtr.pdf	Issues and Programs Lists	08/23/2016 3:37 PM
Uploaded a file WUNP Issues Pgm 2016 2nd qtr amended.pdf	Issues and Programs Lists	08/23/2016 2:37 PM
Uploaded a file UNC-TV EEO Report FY16.pdf	Equal Employment Opportunity Records/Additional Documents/EEO Public File Reports	07/29/2016 4:57 PM
Uploaded a file WUNP Issues Pgm 2016 2nd qtr.pdf	Issues and Programs Lists	07/05/2016 4:35 PM

- **4Q 2016 Issues/Programs List:** UNC-TV timely prepared its fourth quarter 2016 Issues/Programs List prior to the January 10, 2017, upload deadline. Unfortunately, a technical issue with the applicant's email system delayed the upload of the report to the OPIF system until the early morning of January 11, 2017—a mere 6½ hours (which were not during regular business hours) after the deadline. Upon learning of the technical issue, UNC-TV ensured that the relevant Issues/Programs List was uploaded *before the beginning of the next business day*. And, the List was prepared prior to the January 10, 2017, upload deadline; UNC-TV therefore had the capability to provide a copy of the report to any interested party upon request. In light of the foregoing, the applicant respectfully submits that this delay of 6½ hours was *de minimis* at worst, did not prejudice the Commission or the public, and did not materially affect the applicant's compliance with the Commission OPIF rules.
- **1Q 2020 Issues/Programs List:** As a result of the global COVID-19 pandemic, in late March 2020 prior to the deadline for uploading first quarter 2020 Issues/Programs Lists, the Media Bureau extended until July 10, 2020, the deadline by which those lists had to be placed in broadcasters' online public inspection files. *See Media Bureau Announces Extension of Time for Broadcasters to Filed Children's Programming Reports and Quarterly Issues/Programs Lists*, Public Notice, DA 20-353 (Mar. 27, 2020). Accordingly, UNC-TV's April 14, 2020, upload of the first quarter 2020 Issues/Programs List was timely, notwithstanding the fact that the date/time stamp may, at first glance, appear to suggest that it was not.

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The applicant respectfully submits that none of the foregoing is material to the station's overall compliance with Section 73.3527 of the rules.

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