<u>Certification Regarding Compliance with</u> Section 73.3526 of the FCC's Rules During the Preceding License Term

The Applicant acquired the station on November 22, 2013 pursuant to a long-form application on FCC Form 314, and its certifications only cover the period during which it has held the station's license. Upon review of its Public Inspection File to determine whether documentation required by Section 73.3526 of the FCC's Rules has been uploaded when required, Applicant found that:

- While Applicant retains a list of all documents required to be disclosed under Section 73.3613 in its Public Inspection File, some documents were not added to the station's Section 73.3613 list (or, alternatively, uploaded) within 30 days after execution. An updated Section 73.3613 list was included in the station's most recent biennial ownership report.
- The Quarterly Issues & Programs List ("QIP") for Second Quarter 2018, due on July 10, 2018, was uploaded on July 12, 2018; the QIP for First Quarter 2019, due on April 10, 2019, was uploaded on April 12, 2019; and the QIPs for Second Quarter 2019–Fourth Quarter 2019 were uploaded on July 2, 2020.
- The Commercial Limits Certification for Fourth Quarter 2013, due on January 10, 2014, was uploaded on July 8, 2020, after the station discovered that the Fourth Quarter 2013 Form 398 had inadvertently been uploaded in its place; the Commercial Limits Certification for Second Quarter 2018, due on July 10, 2018, was uploaded on July 12, 2018; the Commercial Limits Certifications for Second Quarter 2019 and Third Quarter 2019 were uploaded on June 22, 2020; and the Commercial Limits Certification for Fourth Quarter 2019, due on January 10, 2020, was uploaded on July 2, 2020.
- The Commercial Limits Certifications for Second Quarter 2018–First Quarter 2019 did not include a list of the programs aired during the quarter that were designed for children 12 years of age and younger. The station has uploaded amended certifications to its Public Inspection File.

Applicant will continue to remind station staff of Public Inspection File requirements and upcoming deadlines, will provide additional training to station staff, and will work to implement more robust accountability procedures to enhance the station's compliance with Public Inspection File deadlines going forward.

Applicant notes that the deadlines to file or upload certain documents, including the 2017 Biennial Ownership Report and the various Fourth Quarter 2018 certifications and reports, were extended due to government closures. See 47 C.F.R. § 1.4; see also Revisions to Filing and Other Deadlines Following Resumption of Normal Operations, Public Notice, DA 19-26 (rel. January 29, 2019). In addition, the deadlines to file the 2019 Children's Television Programming Report and to upload the Quarterly Issues & Programs List for First Quarter 2020 were extended due to the COVID-19 pandemic. See Media Bureau Announces Extension of Time for Broadcasters to File Children's Programming Reports and Quarterly Issues/Programs Lists, Public Notice, DA 20-353 (rel. March 27, 2020).