

STATEMENT AS TO PUBLIC INSPECTION FILE RULE COMPLIANCE

The applicant wishes to advise the Commission that in submitting its renewal application, it is herein reporting that, during the renewal term, there were some minor problems, since corrected, in connection with the timely uploading of candidate requests for broadcast time to its political file contained within its online public inspection file.

In connection therewith, the applicant has found that there were two instances, both of which occurred in 2018, that were not fully compliant with Commission timeliness of uploading requirements. In August and September of 2018, candidate requests were received and proper information collected and documented, but the documentation concerning the candidate requests were not uploaded to the political file until October 2018. In October 2018, other candidate requests were received, but not uploaded until November 7, 2018, and candidate requests that were received in October 2018, while timely uploaded, were subsequently revised and the revised requests were not uploaded until November 7, 2018. Finally, the applicant has determined that, in 2014, in two instances, in July and October of that year, candidate requests were uploaded five and four days after the requested broadcast time had commenced.

The applicant recognizes its responsibilities and has undertaken the necessary remedial work to bring its public inspection file into compliance. In this regard, the applicant's candidate requests during the 2020 election process have been timely uploaded and the applicant expects that the managerial-level staff member, handling the public inspection file and trained as to the Commission's requirements, will maintain this record of timeliness.

Lastly, the applicant wishes to take note that the Commission has recognized that, in this round of license renewals, the Commission's interest is in having online public inspection files 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.