

## Political File Exhibit Part 1

Attached as Political File Exhibit Part 2 and Political File Exhibit Part 3 are two excel spreadsheets reviewing the contents of WINK-TV's political file for 2018, 2019 and 2020. The political file items in these spreadsheets are identified as follows:

- (a) The letter "k" before a number indicates that the item is a contract. So entry k123446 is contract number 123456.<sup>1</sup>
- (b) "INV" before a number indicates that the item is an invoice. So entry INV123456 is an invoice for contract number 123456.<sup>2</sup>
- (c) PB-18 or 19 indicates NAB political Form PB-18 or PB-19. These forms are not the political contracts for the station. They are a means of collecting sponsor identification and other information required in political recordkeeping.
- (d) There are other forms used in the station's political recordkeeping. Some track whether files uploaded to the online political file actually appear in the FCC's online files. This is something that cannot be determined immediately upon uploading, because of the design of the FCC's online public inspection file.

Political File Exhibit Part 2 is the excel spreadsheet for 2018. It is included here out of an abundance of caution, since political files for 2018 are more than two years old and are not required to be included in public inspection files. In 2018, it was not the practice of WINK-TV to upload political file materials in its public file within one business day. So the large majority of contracts for political time in 2018 were not uploaded within one business day of their creation.

Political File Exhibit Part 3 is the excel spreadsheet covering WINK-TV's 2019 and 2020 political file uploads. During this period, WINK-TV adopted the practice of uploading political file materials within one business day of their creation. This practice was not perfectly implemented. However, of the 266 contract entries for 2019 and 2020, only 25 were filed more than one business day after the contract date. Of these 25, 14 contract entries were uploaded within one business day of the date they were printed and one contract was uploaded within one business day of the date it was amended.

With respect to WINK-TV's efforts to address political record-keeping filing delays, Fort Myers Broadcasting Company is a party to a political consent decree approved by Order, DA 20-860, released August 10, 2020. While WINK-TV is not covered by this consent decree, the persons maintaining WINK-TV's political file are "Covered Employees" who have received political record-keeping training required by the consent decree. These employees follow those Fort Myers Broadcasting Company political record-keeping procedures adopted to implement the consent decree, other than procedures requiring the filing of reports with the FCC.

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<sup>1</sup> Three dates may appear on contracts. The contract date, the contract print date and the contract amendment date. Contracts and contract amendments cannot be scanned and uploaded to the political file before the print date.

<sup>2</sup> The dates on invoices are not the dates invoices are printed and sent to clients. An invoice dated August 30, for instance, would be printed and mailed in mid-September. Some invoices show a balance calculation and the invoice would not be finalized before that balance calculation date.