

## **Alpha Media Licensee, LLC – Topeka, KS Online Public File**

In preparation for filing its license renewal applications, Alpha Media Licensee, LLC (“Alpha”) has conducted audits of the online public inspection files (“OPIF”) at its radio stations.

### **Political File**

Having become aware of deficiencies with respect to the timely upload of political advertising information in certain markets, and as the Commission is aware, Alpha, with commitment at the highest corporate levels, redoubled the company’s efforts to train staff consistently and to implement company-wide operating procedures so as to ensure that requisite political advertising information is timely uploaded to the OPIF in compliance with the Commission’s rules. Alpha submitted documentation of these efforts to the Commission in April 2020 and entered into a Consent Decree with the Commission on July 22, 2020.

In October 2020, Alpha reported to the Commission that three issue ad orders for the Senate Leadership Fund were not uploaded to the online political file for station KTPK(FM) within one business day. As previously explained, station personnel misread the orders to be part of the network buy for other affiliated stations, not a local station order for KTPK(FM). In reviewing the political file in preparation for this renewal filing, the station has determined that there were four orders placed by this PAC that were late uploaded, not three. That error was corrected with respect to all orders on September 30.

Alpha also notes that a request for time related to a political issue ad for Americans For Prosperity Action was inadvertently uploaded within one business day of its initial receipt to the WIBW(AM) political file rather than the WIBW-FM political file. The start date for that issue ad’s schedule was pushed back and the order revised – all political file material related to the revised order was timely uploaded to the WIBW-FM political file.

### **Issues/Programs Lists**

An audit of the OPIF determined that, because of an administrative oversight, 2018 and 2019 issues/programs lists were not uploaded to the WIBW(AM) OPIF until July 6, 2020.

### **EEO**

Each station in the Topeka, KS cluster uploaded its 2019 EEO Public File Reports two days late due to an administrative oversight.

### **KSAJ-FM**

In 2017, Alpha sold its Salina, Kansas cluster, except for KSAJ-FM. Alpha obtained a construction permit to modify the KSAJ-FM facilities to reflect Burlingame, KS as its community of license. Station operations were moved to the Topeka, Kansas market, where Alpha operated other stations. As a result, there were certain glitches with maintenance of the KSAJ-FM OPIF.

First, KSAJ-FM's OPIF is missing all issues/programs lists from 2017. It appears that between the station's move and critical illness faced by the individual responsible for uploading the lists, they were not uploaded and lost in the process.

An audit of the online public file in preparation for this renewal filing also determined that KSAJ-FM's Q1 2019 issues/programs list was missing – station personnel found it was still “pending” in the OPIF and converted the file in January 2021.

Finally, because KSAJ-FM joined a new Station Employment Unit (“SEU”), its EEO Public File Report for 2016 (which pertained to the Abilene, KS SEU) was purged.

Alpha will continue to monitor OPIF compliance closely going forward.