

KBCY(FM) Renewal Certification Exhibit

Preliminary Statement

The ultimate parent of the licensee, Cumulus Media Inc. (“Cumulus”), as well as various other direct and indirect wholly-owned subsidiaries, emerged from a Chapter 11 bankruptcy proceeding on May 10, 2018. As a result, the station which is the subject of this renewal application was transferred to the licensee on June 4, 2018 pursuant to a long-form transfer of control application (File No. BTC-20180322ALP) following Cumulus’ emergence from bankruptcy. Therefore, the license term with respect to this station commenced on June 4, 2018.¹

Online Public Inspection File

There are documents in the station’s political file that were not uploaded in a timely manner pursuant to 47 C.F.R. §73.3526 of the Commission’s Rules. In addition, despite the licensee’s diligent efforts, there are documents that were not filled out in their entirety, e.g., a list of the officers or board members for non-candidate issue ads, or where the issue was of national importance, a statement about the issue. In such cases, the advertiser failed to provide this information. However there were less than five (5) late political advertisements uploaded late.

On July 22, 2020, the Commission issued an *Order* and *Consent Decree* (DA 20-776)² in which Cumulus agreed to report any violations of Section 73.1943(c) of the Commission’s Rules. Cumulus reports that, since the effective date of the *Order* and *Consent Decree*, there have been no violations of this rule.

All issues/programs lists and annual EEO public file reports are included in the station’s online public file. There are several instances in which the lists were not uploaded in a timely manner and one instance when the EEO report was not uploaded in a timely manner.

Those station employees who have responsibility for preparing and maintaining the documentation required to be uploaded to the station’s online public file, including its political file, have been reminded of the FCC’s requirements with respect to these matters and have implemented procedures to ensure that the required documentation will contain all of the appropriate information and will be placed in the station’s online public file, including its political file, in a timely manner going forward.

¹ See Instructions—Form 2100, Schedule 303-S – Renewal of Broadcast Station License at 2 (2019); *Citadel Broadcasting Company*, 25 FCC Rcd 15060, 15062 (MB 2010).

² File No. MB/POL-07072020C