

**STATEMENT AS TO PUBLIC INSPECTION FILE RULE COMPLIANCE**

The applicant wishes to advise the Commission that it has, in preparing its renewal application, determined it has not been as diligent as required in the process of uploading and maintaining a portion of its online public inspection file during the renewal period.

In connection therewith, the applicant has determined that errors occurred in the timely uploading of political advertising agreements as the transition to online public inspection files, for small market radio stations, occurred in 2018. The applicant has determined that three political advertising orders, entered into in October 2018, were not uploaded to the online public inspection file until December 2018. The applicant has, since 2018, met the as soon as possible standard in uploading its political advertising agreements.

The Commission has recognized that, in this round of license renewals, the Commission's interest is in having online public inspection files be 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, where the public inspection file errors occurred early in the online transaction and are few in number.