

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 its online public inspection file during the renewal period.

In connection therewith, the applicant has determined that errors had occurred in the timely uploading of its quarterly compliance with the Commission's issues/programs requirements, EEO Public File Reports and political broadcasting agreements.

The applicant has determined that its Issues/Programs reports were not timely uploaded. As for its EEO Program Report, KGOW does not have any full-time employees dedicated to it and the Station is time brokered to a third party. Consequently, the Employment Unit's EEO efforts are reported by its sister station, Station KFNC. The applicant has now placed the Employment Unit's EEO Program Reports in the KGOW public inspection file as well. Finally, there was one political advertising sale made in 2020 and that agreements have now been entered into the public inspection file.

The applicant is the licensee of a combined AM and FM radio station in one market, without other broadcast interests. It has limited employee resources and there are times when its staff is overwhelmed with work and actions are delayed. Its resources were further constrained in 2020 owing to the pandemic and the need for station management to expend its efforts on the economic preservation of the stations. The applicant is now implementing new procedures in order to ensure better compliance with the uploading requirements.

The applicant also submits that the change from a paper file to an online one has altered routines at its Station, which, as noted, is a small market station with a limited staff. The

applicant and its minimal staff are learning the necessary procedures, which pose difficulties for them because they do not have the benefit of a large staff. This problem has been compounded by the pandemic, which has caused difficulties for most radio stations as they are forced to reduce staff, deal with work from home practices, and face complications owing to illness on the part of employees and their families.

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.