

FCC Form 303-S
Online Public Inspection File Certification Exhibit

In preparation for filing this renewal application, the Station conducted a careful review of its online public inspection file to determine whether there were any areas of noncompliance with FCC rules. Based on this diligence the Station discovered 11 instances where documentation related to purchases of time for political advertising were not properly uploaded to the online public file. Upon discovering this issue, the Station promptly posted all missing documentation. The Station also discovered during its diligence that documentation for several purchases of time for political advertising were uploaded to the online political file at the time the order information was reconciled, rather than when the order was originally placed.

The Station understands and takes seriously its obligations under the Communications Act and the Commission's rules, including the FCC online public inspection file requirements. In light of the issues revealed by its diligence, the Station is taking new steps to ensure that documents and information are uploaded to the online public inspection file and online political file in a timely manner as required by the Commission's rules. The Station has reviewed the filing requirements of Section 73.3526(e) and Section 73.1943(c) with outside counsel to ensure that proper practices and procedures are in place. The Station's management has reinforced the FCC's online public inspection file requirements with Station staff, and it will follow protocols so that up-to-date materials are consistently uploaded by the relevant deadline.

In an abundance of caution, the Station notes that its online public inspection file contains an up-to-date list of contracts, in accordance with 47 C.F.R. § 73.3526(e)(5). The Station's most recent Biennial Ownership Report (Form 323) (dated January 24, 2020) contained a list of such contracts; however, this list had not been separately uploaded as a standalone document to the Station's online public inspection file. The Station promptly remedied this issue upon its discovery.