

**AMENDMENT TO WBNA-DT LICENSE RENEWAL APPLICATION  
#0000137994 AND STATEMENT AS TO PUBLIC INSPECTION FILE RULE  
COMPLIANCE**

The applicant is amending the above captioned renewal application to revise its answer to the application question concerning compliance with 47 CFR §73.3526, in particular, subsection (e )(6) concerning the political file.

The applicant continues to maintain a paper public file for Station WBNA-DT and in the course of filing a copy of the aforementioned License Renewal Application, the new Station General Manager discovered eleven (11) political advertising contracts which were maintained in the paper public file but were not timely uploaded to the online public file. Three contracts were related to the 2018 general election period, two were related to the 2019 primary election period, three to the 2019 general election period, one for the 2020 primary election period and two for the 2020 general election period. All eleven contracts have now been uploaded to the applicable folders by year in the WBNA-DT OPIF political file. It appears that during the relevant time period for these political advertising contracts, staff members failed to transmit these 11 contracts to the party responsible for maintaining the online public inspection file in contravention of station procedures and instead mistakenly filed them in the paper public file which WBNA-DT continues to maintain independent of its online public file, as had been the prior practice before implementation of the OPIF system.

Applicant recognizes the derogation of its responsibilities in this narrow instance and has undertaken the necessary remedial work to bring its political subfile of its online public inspection file into compliance. It has appointed a single individual, Trey Volz, the new Station General Manager, to take charge of any future political advertising contracts being uploaded to the online public inspection file and fully expects it will remain in compliance with its obligations in this matter going forward.

Applicant notes that the FCC's conversion a paper public file to the OPIF system altered processes and routines that were long engrained in staff behavior at WBNA-DT, which has a small staff and which lacks the resources of larger, commercial network O&O or major affiliate stations. The Commission has recognized in this cycle of license renewals that the Commission's interest is in having online public inspection files 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). WBNA-DT submits that this is an appropriate policy that should be applicable to the Applicant in this instance, but is prepared to enter into any necessary compliance agreement that the Political Branch deems necessary to ensure future compliance.