

Online Public Inspection File

The licensee wishes to note that the Issues/Programs List and Certification of Compliance with Children's Commercial Limits for the Fourth Quarter 2018 were each timely uploaded to the online public inspection file and/or filed once the federal government reopened after a shutdown.

The licensee also notes that, in several instances, the deadline for submitting its Children's Television Programming Report fell on a weekend or holiday, and the report was uploaded in a timely fashion on the next business day; the quarters at issue were Third Quarter 2015, First Quarter 2016, and Third Quarter 2016. The report for Third Quarter 2018 was uploaded one day late due to a technical, computer problem with authentication, which was discussed with the FCC staff at the time, documented in an exhibit, and was beyond the licensee's control.

Similarly, in a few instances the deadline for uploading Issues/Programs Lists fell on a weekend or holiday, and the licensee provided the reports in a timely fashion on the next business day. The quarters at issue were Fourth Quarter 2014, Fourth Quarter 2015, Second Quarter 2016, and Fourth Quarter 2020.

During the time period under review, the licensee diligently prepared its annual EEO public file reports and timely added those reports to its public file. Please note that, in one instance (the 2015-2016 report), the report was uploaded one business day late; in one other instance (2016-2017 report), the report was uploaded two business days late. The licensee submits that these were *de minimis* errors.

The licensee has had a regular practice of uploading political advertising information to the station's public inspection file. Review of the online public file during renewal preparation showed that there were isolated instances in which records of political advertising were uploaded materially late in approximately 5 cases. (We have counted as a single case one instance in which records were uploaded late for a candidate whose campaign committee bought two flights of spots on the same day to air in different weeks resulting in different public file entries for each week, but these were placed as part of the same order.) Also, in most instances, the station did not timely upload invoices or provide specific detail about the class of time sold or, in a limited number of cases, may not have provided complete information on matters other than the price and schedule of the political advertising. Upon discovery of these omissions, the licensee has taken corrective action to ensure that the political files are materially complete and that all political information is uploaded as soon as possible.

In connection with the post-incentive auction repack process, the licensee provided the required notice to viewers; however, once it completed that process, it did not timely upload a certificate showing compliance with this obligation to its online public inspection file. The licensee has corrected that deficiency, and the file now includes the requisite notice.