

FCC Form 303-S
Public Inspection File

KLNV(FM), San Diego, CA (the “Station”) and sister station KLQV(FM), San Diego, CA broadcast the same community program “De Viva Voz” which is generally the main content of the quarterly issues programs lists for both stations. From fourth quarter 2013 to fourth quarter 2017 the station uploaded both KLVN(FM) and KLQV(FM) quarterly issues programs lists as one file. To facilitate the review the Station has reuploaded the quarterly issues program lists as separate files. The Station completed its 3rd quarter 2014 issues/program list in a timely manner, but inadvertently uploaded the incorrect report. It uploaded the correct report after a review of the file in connection with this license renewal.

The Station believes that it has generally met the requirement in Section 73.1943(c) of the FCC rules to post political orders to the online public inspection file “immediately, absent unusual circumstances.” The Station is not aware of any political spot for which it did not post information to the public inspection file. In an abundance of caution, the Station reports the following:

- In January 2020, the Station posted information regarding a candidate ad for Tom Steyer 26 days after the contract date.
- In February 2020, the Station posted information regarding 3 candidate ads for Tom Steyer 6 to 13 days after the contract date.
- In February and March of 2020, the Station posted information regarding 6 candidate ads for Mike Bloomberg between 5 and 13 days after the contract date.
- According to the Station’s internal records, it received one local issue ad (Howard Jarvis Taxpayers) on July 21, 2020 and posted information regarding that ad on September 16; and another local issue ad (CA Responsible Housing) on July 24, 2020 and posted information regarding that ad on September 14.
- On October 23, 2020, the station posted information about another local issue ad (Yes on 15) 15 days after the date of the NAB political broadcasting form.

Univision submits that the 2020 pandemic clearly is an “unusual circumstance” meriting regulatory relief from the Commission’s normal interpretation of its posting requirement. The first known case of COVID-19 in California was reported before the end of January. That case, involving a traveler returning from Wuhan, China, was actually one of the earliest cases in the entire U.S. The second reported case in California was just a day later. In the first week of February, two planeloads of 350 Americans returning from China were quarantined in California. In mid-February 2020, San Diego County declared a local health emergency, after two residents tested positive for COVID-19.

By the first week of March, following a number of emergency declarations in local jurisdictions, Governor Newsom declared a state of emergency in California. On March 11, the Governor recommended that gatherings not exceed 250 people and extended paid family leave and disability benefits to those affected by COVID. The following week, more than 5.7 million California children in grades K-12 were sent home from school indefinitely. On March 13, the California Legislature passed \$1.1 billion in emergency coronavirus funding for ventilators, hospital beds and hotels. On March 19,

with the number of reported cases continuing to grow, the Governor ordered California residents to stay home, subject to fines of up to \$1,000 and 6 months imprisonment for violations.¹

In mid-March, 2020, all of the school districts in San Diego County were shut down; UC San Diego, San Diego State University, and other colleges cancelled classes or moved them online; local tourist attractions were closed; church services were cancelled and restaurants and bars closed.²

On March 6, President Trump signed a \$8.3 billion coronavirus relief bill, funding the development of a vaccine and treatment, providing loans for small businesses, and supporting state and local governments. The following week, President Trump declared a national emergency, freeing billions of dollars in federal funds for disaster relief and assistance. On March 22, the President declared a major COVID disaster in California.

On May 26, California reported over 3,200 new coronavirus cases, breaking the previous day's record and raising the total number of cases to more than 100,000. On July 31, California reported 215 deaths, its highest daily record. By September 20, more than 15,000 Californians had died from COVID-19. By the end of the year, California became the first state to record more than 2 million coronavirus cases and more than 23,000 Californians had died.

To date, there have been 283,376 COVID cases in San Diego County, including 15,577 hospitalizations and 3,782 deaths.³

Consistent with the Governor's disaster proclamation, the Station directed all employees whose job function was not essential to the physical plant to work from home, including the Station employee charged with maintaining the Station's public inspection file and the Station's sales employees. Working from home during the pandemic made coordination between employees involved in political broadcast orders and employees charged with posting related paperwork more difficult. In addition, the Station was forced to take certain measures to blunt the severe economic impact of the pandemic. From May 1, 2020 to July 31, 2020, approximately 16 Station employees were subject to these furloughs, including the individual responsible for maintaining the Station's public file.

Univision recognizes the importance of posting political information to the public file "immediately, absent unusual circumstances." With the benefit of experience in dealing with the pandemic in Los Angeles, and despite ongoing resource challenges due to the pandemic, Univision has worked with its

¹ "Remember when? Timeline marks key events in California's year-long pandemic grind," Richard Procter, Cal Matters, March 4, 2021, Reviewed July 6, 2021, <https://calmatters.org/health/coronavirus/2021/03/timeline-california-pandemic-year-key-points/>

² "What Has Happened in a Year? A Month-by-Month Look at the Coronavirus Pandemic in San Diego County," NBC 7 shares a month-by-month look back at how the coronavirus pandemic has impacted San Diego County, Published March 11, 2021, Updated on March 11, 2021 at 7:19 pm, visited July 8, 2021, <https://www.nbcsandiego.com/news/local/what-has-happened-in-a-year-a-month-by-month-look-back-at-the-coronavirus-pandemic-in-san-diego-county/2545774/>

³ Coronavirus Disease, San Diego County, visited July 8, 2021, https://www.sandiegocounty.gov/content/sdc/hhsa/programs/phs/community_epidemiology/dc/2019-nCoV/status.html

employees involved in the political sales process to emphasize the need for timely posting of relevant documentation even in adverse circumstances such as last year's events.⁴

⁴ "Remember when? Timeline marks key events in California's year-long pandemic grind," Richard Procter, Cal Matters, March 4, 2021, Reviewed July 6, 2021, <https://calmatters.org/health/coronavirus/2021/03/timeline-california-pandemic-year-key-points/>