

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 a portion of its online public inspection file during the renewal period.

In connection therewith, the applicant has determined that errors occurred in the timely uploading of issues/programs lists and political advertising agreements as the transition to online public inspection files, for small market radio stations, occurred in 2018.

The applicant has determined that one Issues/Programs report, for Q4 of 2018, was not timely uploaded. The applicant has recognized this problem and has retrained the staff member involved and added additional supervision, in order to ensure that such failure will not occur in the future.

The applicant has determined that three political advertising orders, involving a state candidate and a non-candidate ballot issue, entered into during the 2018 election cycle, are missing from the public inspection file. It has also determined that one political advertising order, involving a federal candidate, during the 2020 election cycle, was not uploaded until four days after the start date of the political advertising order.

As previously noted, the licensee has retrained the responsible employee and added additional supervision of the employee, and fully expects that the Station will be timely in its future uploading of political advertising orders.

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, where the public inspection file errors are few in number.