

**KRRS(AM) License Renewal Exhibit  
Online Public Inspection File Certifications**

California Broadcasting Company, LLC (“Licensee”), licensee of KRRS(AM) (“KRRS” or “the Station”) has responded in the negative to the online public inspection file certification that states: “Licensee certifies that the documentation required by 47 C.F.R. Section 73.3526 or 73.3527, as applicable, has been uploaded to the station’s public inspection file as and when required.”

The Licensee believes the following observations are relevant to the foregoing certification:

**(1) Post-2018 Issues/Programs Lists Uploads.** Throughout the license term, the Licensee timely prepared and placed in the Station’s public inspection file the majority of its quarterly Issues/Programs Lists. However, over the past several years the Licensee has experienced significant financial distress, which in turn has forced the Licensee to make the difficult decision to reduce Station personnel in an effort to cut overhead and maintain the Station’s economic viability. Although the Licensee diligently attempted to ensure that such employment changes did not affect the Station’s operations, upon preparing the accompanying license renewal application the Licensee discovered that when one of its employees departed in late 2018, so did the Station’s historic practice of timely preparing and placing its Issues/Programs Lists into the Station’s OPIF.

More specifically, throughout the majority of the license term the Licensee employed a program director who, in addition to performing his programming duties, was responsible for generating and timely placing in the Station’s public file each quarterly Issues/Programs List.<sup>1</sup> When that programming director’s employment with the Licensee ended in late 2018, the Station inadvertently failed to reassign the duty of preparing and uploading to the OPIF the quarterly Issues/Programs Lists. As a result, the Licensee is currently in the process of taking remedial action regarding the Issues/Programs Lists for the quarters from fourth quarter 2018 to the date of this application’s filing, which are not currently available in the station’s OPIF.

As can be seen from the Issues/Programs Lists available in the Station’s OPIF, each quarter the Licensee typically airs dozens of PSAs in the native language of and targeting issues facing the significant and historically underserved subset of the Station’s community of license. Notably, the population in KRRS’s Santa Rosa, California, is nearly one-third Hispanic, with a similar percentage of households in Santa Rosa primarily speaking a language other than English at home.<sup>2</sup> KRRS takes seriously its public interest obligation to serve that population and has done so by, among other things, providing issue-responsive programming throughout the entire license term—including in the quarters that are the subject of this Exhibit.

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<sup>1</sup> Although the program director generally successfully timely placed each quarterly Issues/Program List in the Station’s public file, upon transitioning from the paper to the online public file system in March 2018, he experienced upload delays with the Lists for first and third quarter 2018. Those two lists were each uploaded within 72 business hours of the relevant deadline.

<sup>2</sup> U.S. Census Bureau, *QuickFacts: Santa Rosa City, California* (last visited July 26, 2021) (detailing that 32.2% of persons age 5 years+ speak a language other than English at home), <https://www.census.gov/quickfacts/fact/table/santarosacitycalifornia/PST045219>.

KRRS respectfully requests that its belated upload of the Lists noted above be viewed within this overall context. The Licensee has now trained Station personnel regarding the requirement to timely upload each quarterly Issues/Programs List to the Station's OPIF, and, in conjunction with legal counsel, has implemented safeguards intended to ensure timely uploads going forward.

**(2) No Political File Records.** Out of an abundance of caution, the Licensee notes that it is intentional and appropriate for KRRS to have no documents in its political file folders at this time. KRRS received no requests or orders for political advertising time during the relevant two-year reporting period and therefore has no political file records as of the date this application is being filed.

**(3) No EEO Public File Reports.** Out of an abundance of caution, the Licensee notes that it dropped below five full-time employees at the end of the preceding license term and continues to have fewer than five full-time employees. Accordingly, the Licensee was and is not subject to the reporting obligation in 47 C.F.R. § 73.2080(c)(6).

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The Licensee respectfully submits that the circumstances surrounding the Station's quarterly Issues/Programs Lists referenced above are not material to the station's overall compliance with Section 73.3526 of the Commission's rules, and the Licensee respectfully requests a grant of the accompanying renewal application with no sanctions for the deficiencies (or, in the alternative, with a letter of admonishment).

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