

## Station KMGH-TV Public Inspection File Documents

Station KMGH-TV's online public inspection file is substantially complete and it timely complied with the online file posting requirements except as follows:

### *Political File:*

Scripps makes extraordinary efforts to ensure that its stations comply with the FCC's directive that political purchase orders be uploaded to its stations' online political files in an easily accessible fashion "as soon as possible." Senior corporate staff are tasked with training local station sales personnel in Scripps' practices, and during times of significant political buying, Scripps hires additional corporate employees who are dedicated to monitoring its local stations' practices in real time and assisting them with compliance.

While a review of Station KMGH-TV's online file suggests that sometimes an order's posting was not timely, review of the history of the station's political file activity shows that the station was often in fact adding material related to that order and deleting its previous filings documenting that order--as required to update or otherwise supplement the original order.

Nevertheless, Scripps is unable to certify that all of the many postings to the station's political file were originally made within a day of the order's receipt. Review of the past two years, including the history file, shows that most orders were originally posted in a timely manner, although in a relatively small percentage of the cases documentation was posted between a day and a week late, and in an even smaller number of cases, there were longer delays. Documentation of certain revisions to original orders was also posted late in certain cases, sometimes experiencing longer delays. These late uploads could have been due to issues such as delayed purchaser approval of a final order, Internet connection problems-- including difficulties accessing the FCC's online public file, or staff processing errors, and the station did not believe it necessary to make a contemporaneous note of such occurrences that were promptly remedied.

When Scripps discovers through its compliance and review processes that political file uploads at a station did not occur promptly under the circumstances, it has taken corrective action to ensure timely uploads going forward. Scripps certifies that it will continue to work with and monitor Station KMGH-TV's political file practices to ensure that the station meets the FCC's political public file requirements.

### *Other Documents:*

The Station's annual EEO Public File Reports for 2014, 2017, 2019, and 2020 were posted to the station's public inspection file between three days and one year late. The Station's EEO Public File Reports for 2015 and 2016 were posted in a timely manner but were later removed and reposted to correct errors in the original postings. The Station's issues and programs list for the second quarter of 2016 was also posted one day late. Scripps also notes that between 2014 and 2018, the station included documentation of its compliance with the commercial limits in children's programming as part of its quarterly Form 398 children's programming reports rather than as a separate document; separate documentation was later uploaded to the "Records Concerning Commercial Limits in Children's Programs" folder of the online public file.