

Online Public Inspection File

The Licensee has certified in the negative to the question asking whether the documentation required by 47 C.F.R. § 73.3526 has been uploaded to the station's public inspection file when required. The Licensee's certification applies with respect to the beginning of the license term, October 9, 2014 (the date the KRDO-TV's last renewal application was granted), through the present. *See Fox Television Stations, Inc.*, 33 FCC Rcd 7221 (2018), ¶¶ 31-32.

The Licensee discloses the following circumstances related to the KRDO-TV online public inspection file (OPIF):

- **2015 Biennial Ownership Report**. Please refer to the Biennial Ownership Report exhibit related to the late-filed 2015 Biennial Ownership Report for "parent entity" trusts. The Licensee's and its direct corporate parent's Reports for 2015 were timely filed and all beneficial owners were timely disclosed.
- **Limited Delayed Commercial Certification Records**. The Licensee uploaded quarterly Certifications of Compliance with Children's Commercial Limits late for Fourth Quarter 2014 (2 to 3 days) and Fourth Quarter 2016 (14 days).
- **Limited Delayed Issues/Programs Reports**. The Licensee uploaded quarterly Issues/Programs Reports late for Fourth Quarter 2014 (3 days), Second Quarter 2016 (1 day), Third Quarter 2018 (1 day), Fourth Quarter 2018 (2 days late following return to normal operations after government shutdown), First Quarter 2019 (1 day), and Second Quarter 2019 (1 day).
- **Political File**. With respect to political file records required by 47 C.F.R. § 73.3526(e)(6) and §73.1943, the Licensee reports as follows:
 - **Reconciliation Information**. The Licensee did not always upload reconciliation information contained in station invoices to the OPIF. *See Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Second Report & Order, 27 FCC Rcd 4535 (2012), ¶ 57. As of mid-November 2021, the Licensee has uploaded invoices that were previously not present.
 - **2021 Class of Time**. Additional descriptive information about the classes of time for the political advertising sold thus far in 2021 was uploaded in mid-November 2021. The class of time was disclosed on the political order forms using a "P code," and descriptive information was available in the 2020 and 2019 folders.

- Restored and Delayed Political File Uploads. The Licensee sought to diligently maintain the political file throughout the relevant period. In fall 2020 in preparation for the 2020 general election, sales personnel with political file responsibility sought to improve and streamline the records in the file. These efforts were undertaken to make review of the file more “user friendly” for advertisers and members of the public. In making these improvements, station personnel deleted a number of files for 2019 and 2020 and then re-uploaded the records. The deleted files were restored to the OPIF (from the station’s OPIF recycle bin) in preparation for filing this renewal application.

On some occasions throughout the relevant period, the Licensee was delayed by several days or weeks in uploading political file orders. Additionally, in about a dozen cases primarily involving issue orders, the Licensee identified missing NAB disclosure forms; all available NAB forms were uploaded in mid-November 2021. The Licensee is cognizant that these time periods for orders and NAB disclosure forms do not meet the Commission’s immediacy expectations. The Licensee respectfully urges the Commission to view these matters against the context of the COVID-19 pandemic, when station personnel responsible for political file uploads had transitioned to remote work and some of whom became ill with COVID-19, making communication about the political file more difficult and completion of political file tasks more cumbersome.

In 2021, the Licensee sought and received additional training from counsel on the political file requirements with respect to complete and timely uploads.

Otherwise, the Licensee wishes to explain the following circumstances, which may at first appear to, but do not in fact, impact the timeliness of uploads:

- The Fourth Quarter 2018 Certifications of Compliance with Children’s Commercial Limits was timely uploaded to the OPIF once the federal government reopened after shutdown.
- The 2019 Annual Children’s Television Programming Report was timely filed and the First Quarter 2020 Issues/Programs Report was timely uploaded to the OPIF pursuant to a blanket extension granted by the Media Bureau related to the COVID-19 pandemic.
- The Licensee timely uploaded its EEO Public File Report for 2014 and then uploaded a supplemental portion of the Report about 15 days later. The supplemental portion reflected data for three full-time employees hired at

commonly owned radio stations in the Employment Unit (KRDO-FM and KRDO(AM)).

The Licensee acknowledges the inadvertent departures from the public file timeliness requirements described herein and respectfully submits that the circumstances described in this exhibit should not negatively impact a determination of KRDO-TV's overall compliance during the license term.

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