

KTTM Online Public Inspection File Certification/ Rule Violation Exhibit

During its most recent license term, Station KTTM(TV) did not fully comply with certain online public inspection file (OPIF) requirements as provided in Section 73.3526 of the Commission's rules.¹ In particular, there were late filings of Children's TV Commercial Limit Certifications, Children's TV Programming Reports, Issues/Program Lists, Political File advertisement purchases, and one Annual EEO Report.

The licensee, Independent Communications, Inc., appreciates its obligation to fully comply with the Commission's rules, including all deadlines for uploading required material to KTTW's OPIF. These errors were discovered as part of a review in preparation for the filing of this renewal.

In regards to Political Files, while Independent understood that it was to upload political materials in a timely manner, it did not understand that the FCC intended that such materials be uploaded within 24 hours. Some political files were not uploaded within the time frame recently articulated by the FCC. The Licensee now understands the FCC's position and is committed to complying with the upload of required political materials within 24 hours/one business day of a request to purchase broadcast time.

In regards to EEO filings, Station KTTM is a satellite station of co-owned Station KTTW and has fewer than five full-time employees. In connection with an EEO audit earlier this year, the licensee determined and reported to the Commission that, due to the substantial distance between the two stations, KTTM is not included in the same employment unit as its parent station. By letter dated June 1, 2021, the Commission's staff determined that no further action was warranted. Thus, although KTTM generally posted in its online public file the same documents as those posted by the parent station, since KTTM is in a separate employment unit which had fewer than five full-time employees throughout the license term, it was not required to do so.

In regards to Children's TV Programming Reports, while four were filed late – 2014 4Q, 2015 2Q, 2015 4Q and 2016 1Q, due to the dates of weekends, 2014 4Q was filed only one day late, and 2015 2Q was filed only one business day late.

In regards to Children's TV Commercial Limit Certifications, while they were filed late, it should be noted that all of them were in fact filed. Most recently, it was discovered that the certifications for 2019 and 2020 were timely prepared, but inadvertently not filed. Accordingly, they were filed on November 17, 2021.

In regards to Issues/Program Lists, only two were filed late – 2016 3Q and 2019 3Q were timely prepared but inadvertently not filed in 2016, so it was filed on November 17, 2021.²

¹ 47 C.F.R. § 73.3526 *et seq.*

² The Issues/Programs Lists for 2019 2Q and 3Q were timely filed, but on November 17, 2021, were re-uploaded as PDFs since the original upload as a WORD document failed to properly convert.

FCC Form 2100 – Schedule 303-S
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More broadly, the station employees who have the responsibility for preparing and maintaining the documentation required to be uploaded to the station's online public file, have been instructed regarding the FCC's requirements with respect to these matters, and have implemented calendaring procedures to ensure that the required documentation will be placed in the Station's OPIF in a timely manner going forward.