

LICENSE RENEWAL EXHIBIT

Limited Licensee Ownership Period

The applicant acquired KAKE(DT), Wichita, KS, and its translator stations KHDS-LD, Salina, KS; KGBD-LD, Great Bend, KS; K33NP-D, Russell, KS; and K25CV-D, Hays, KS, on February 1, 2016, as authorized in FCC File No. BALCDT-20151014AEC. Accordingly, the scope of the applicant's responses in the instant application is limited to the period commencing on February 1, 2016.

Statement Regarding Antitrust Final Judgment

While there have been no adverse final actions taken against the applicant or any party to the application, out of an abundance of caution, the applicant wishes to make the Commission aware that applicant's parent company, Greensboro TV, LLC, is subject to a Final Judgment entered in *United States v. Sinclair Broadcast Group, Inc.*, No. 18-cv-02609-TSC (D.D.C. May 22, 2019) with respect to television stations WTNZ (Knoxville, TN), WFXG (Augusta, GA), WPGX (Panama City, FL), and WDFX-TV (Ozark, AL). The Final Judgment resulted from a U.S. Department of Justice antitrust investigation of the prior owner of those stations. The prior owner was a party to the Final Judgment, and Greensboro TV, LLC, was required to agree to be bound by the Final Judgment in connection with the acquisition of those stations.

Online Public Inspection File

The Licensee has responded in the affirmative to the FCC 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."

Licensee wishes to note that, although throughout the relevant period the Licensee timely both generated and uploaded to the online political file the overwhelming majority of the required political file records, the Licensee inadvertently failed to immediately upload records in some instances. These inadvertent delays arose during the rare and unusual circumstances caused by the COVID-19 national and international pandemic,¹ and in many cases were due to inadvertent staffing errors and staffing limitations.

¹ Indeed, the Media Bureau has recognized that the rare and exceptional circumstances presented by the COVID-19 pandemic have impacted station operations and require regulatory compliance flexibility. See e.g., DA 20-353, DA 20-376, DA 20-396, DA 20-398, and DA 20-1059.

The individual responsible for the Licensee's political file records for the majority of the relevant period covered by the instant application is no longer employed by the Licensee. In connection with this staffing change, the Licensee has designated a senior-level director to be responsible for the Licensee's political file recordkeeping and has implemented new internal procedures and policies designed to insure that all required information is uploaded to the Licensee's online political files in a timely manner.

Notwithstanding some upload delays, the Licensee respectfully submits that under the circumstances the Licensee uploaded political file materials "as soon as possible".² And, even if the delays rise to the level of delicts, viewed against the context of the station's overall political file recordkeeping compliance—which spans in excess of 900 document uploads during the relevant period—the Licensee respectfully submits that the delays are *de minimis* and do not materially affect the Licensee's aggregate compliance with the political file recordkeeping rule.

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² 47 U.S.C. § 315(e)(3); 47 CFR § 73.1943(c).