

STATEMENT AS TO EEO RULE COMPLIANCE

The applicant wishes to advise the Commission that it has, in preparing its renewal application, determined it has, in one instance, been as diligent as required in the process of EEO reporting.

In connection therewith, the applicant has determined that the error involved the 2020 EEO Program Report for the Station. That Report was not uploaded until the licensee undertook its preparation of this renewal. The Report is now in its public inspection file.

The licensee has determined that the error occurred during the Covid pandemic, when regular operating patterns were disrupted. The licensee has now reviewed this requirement with its Station staff and fully expects that the Station will be timely in its future uploading of EEO Reports, as it has done with the 2021 EEO Program Report.

The Commission has recognized that, in this round of license renewals, the Commission's interest is in having online public inspection files be accurate as of the license renewal date. To that end, the Commission has announced that it is only where public inspection file compliance is not effectuated by the "deadline for filing a station's renewal application" will that failure result in any impact or adverse action involving the renewal application. *Public Notice*, 34 FCC Rcd 1344 (MB 2019). The applicant submits that this is an appropriate policy that should be applicable to the applicant in this instance, where the compliance error involves a single item