

FCC Form 303-S
License Renewal for WORD-FM
Facility ID No. 58627
EXHIBIT – Online Public Inspection File

In preparation for filing the instant renewal application, the licensee reviewed the public inspection file for WORD-FM (FCC ID: 58627) (the “Station”), and found the issues addressed below:

EEO Public File Reports – The EEO public file report for the reporting period of 4/1/18 to 3/31/19 was uploaded late by one day on 4/2/19.

Political File – In preparation for filing the instant renewal application, the licensee reviewed the Station’s political file and found certain inconsistencies in the timing and placement of political broadcasting materials in the online file. It is the Station’s practice to use the National Association of Broadcaster’s Political Advertising Agreement Forms (“NAB PB”) when requests for political advertising are made. The licensee noted that the NAB PB form and contract dated 2/19/20 for an issue ad for Pennsylvanians Against Illegal Gambling, order #467036, were upload to the public file one day late, on 2/21/20 late due to miscommunication among Station personnel about the political file requirements, as well as a lack of clear policy and procedure at the Station for ensuring proper maintenance of the online political file. The licensee has undertaken steps to ensure full compliance with all online public file requirements, including specific training of staff responsible on the rules pertaining to the maintenance of the political file and establishing clear policy and procedure regarding proper file maintenance.

Quarterly Issues and Programs Lists –With respect to the 2018 Q4 list, the licensee attempted to timely upload this list to the online public file in January 2019 but due to a technical glitch with the FCC website server for several weeks due to the government shutdown, the system failed to accept the upload. The licensee was able to upload the list successfully on 1/29/19.

As a result of discovering these issues, the licensee has taken effective steps to ensure full compliance with all online public file requirements, including specific training of staff responsible for public file maintenance on the rules pertaining to the uploading of materials to the online public file, establishing clear Station policy and procedure regarding proper file maintenance, especially with respect to the importance of timely uploading political material to the file, as well as cross-training Station staff. Furthermore, specific to the political file issues, the Station has implemented procedures described in the Salem Political File Compliance Manual, and mandatory training on the FCC political file rules for appropriate staff adopted as part of the FCC Consent Decree with the Commission and Salem Media Group, Inc.