

STATEMENT AS TO PUBLIC INSPECTION FILE RULE COMPLIANCE

The applicant wishes to advise the Commission that it has determined it has not been as diligent as required in the process of uploading and maintaining portions of its online public inspection file during the renewal period.

In connection therewith, the applicant has determined that errors occurred in the timely uploading of a number of items including political advertising and EEO Program Reports.

During the 2020 election cycle, the following late uploads occurred:

Presidential Candidates: Eight orders were late uploaded with the late time periods ranging from one to 22 days.

House of Representative Candidates: Seven orders were late uploaded with the late uploads being between three days late and one month late.

Senate Candidates: One order was late uploaded by 13 days.

Local Candidates: Three orders were late uploaded by periods of three days to 25 days.

Non-Candidate Issues: There were four instances of late uploads of non-candidate issues ads by periods of 8 to 10 days.

During the 2022 election cycle a single non-candidate issue ad was late uploaded by two days.

In connection with EEO Program Reports, the 2015 and 2016 Reports were uploaded following the time for doing so.

The employee responsible for the public inspection file during the 2020 election cycle is no longer with the licensee. The licensee has been working to ensure that the problems with the

2020 election cycle are not repeated and fully expects those problems not to reoccur. It can report that, with one exception, there were no problems during the 2022 election cycle.

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.