

## Station KERO-TV Public Inspection File Documents

Station KERO-TV's online public inspection file is substantially complete and it timely complied with the online file posting requirements except as follows:

### *Political File:*

Scripps makes extraordinary efforts to ensure that its stations comply with the FCC's directive that political purchase orders be uploaded to its stations' online political files in an easily accessible fashion "as soon as possible." Senior corporate staff are tasked with training local station sales personnel in Scripps' practices, and during times of significant political buying, Scripps hires additional corporate employees who are dedicated to monitoring its local stations' practices in real time and assisting them with compliance.

While a review of Station KERO-TV's online file suggests that sometimes an order's posting was not timely, review of the history of the station's political file activity shows that the station was often in fact adding material related to that order and deleting its previous filings documenting that order--as required to update or otherwise supplement the original order.

Nevertheless, Scripps is unable to certify that all of the many postings to the station's political file were originally made within a day of the order's receipt. Review of the past two years, including the history file, shows that most orders were originally posted in a timely manner, although in some cases documentation was posted between one and three days late, and in an even smaller number of cases, there were longer delays. These late uploads could have been due to issues such as delayed purchaser approval of a final order, Internet connection problems--including difficulties accessing the FCC's online public file, or staff processing errors, and the station did not believe it necessary to make a contemporaneous note of such occurrences that were promptly remedied.

When Scripps discovers through its compliance and review processes that political file uploads at a station did not occur promptly under the circumstances, it has taken corrective action to ensure timely uploads going forward. Scripps certifies that it will continue to work with and monitor Station KERO-TV's political file practices to ensure that the station meets the FCC's political public file requirements.

### *Other Documents:*

The Station's issues and programs lists for the first quarter of 2022, the second quarter of 2019, and the first, second, and third quarters of 2018 were posted between 1 and 6 days after the applicable deadlines; the issues and programs list for the fourth quarter of 2019 was posted approximately six weeks late. The Station's children's programming report for the third quarter of 2018 was filed with the FCC and posted to the online public file 2 days after the applicable deadline. Licensee also notes that through the fourth quarter of 2018, the station had timely uploaded quarterly certifications of compliance with the commercial limits in children's programming as part of its children's educational/informational programming reports; licensee subsequently uploaded separate certification documents to the online public file in November 2020.