

Online Public Inspection File

The Licensee has certified in the affirmative to the question asking whether the documentation required by 47 C.F.R. § 73.3526 has been uploaded to the station's public inspection file when required. The Licensee's certification applies with respect to the beginning of the license term, April 14, 2015 (the date the KPSP-CD's last renewal application was granted), through the present. *See Fox Television Stations, Inc.*, 33 FCC Rcd 7221 (2018), ¶¶ 31-32.

The Licensee discloses the following circumstances related to the KPSP-CD online public inspection file (OPIF):

- 2015 Biennial Ownership Report. Please refer to the Biennial Ownership Report exhibit related to the late-filed 2015 Biennial Ownership Report for "parent entity" trusts. The Licensee's and its direct corporate parent's Reports for 2015 were timely filed and all beneficial owners were timely disclosed.
- Partial Commercial Limits Certification. Records required by 47 C.F.R. § 73.670 for most of 2020 were timely uploaded by the first annual deadline. The station maintained a quarterly upload schedule for the Second, Third, and Fourth Quarters of 2020, and certifications covering these quarters were timely placed in the OPIF by February 1, 2021. The First Quarter 2020 upload was missed due to workflow disruptions caused by the onset of the COVID-19 pandemic in March/April 2020. A certification covering January through March 2020, along with the rest of 2020, was uploaded with the comprehensive annual certification on February 4, 2021.
- One Misfiled Class A Certification. The Class A Continuing Eligibility Certificate for Second Quarter 2016 was uploaded about 5 months late. However, the station's OPIF history records accessed in July 2022 show that the station uploaded a document to the Class A folder prior to the Second Quarter 2016 deadline (see screen capture below), but apparently it uploaded the wrong quarterly item. When the error was discovered, the station uploaded the correct document. The station at all relevant times maintained its Class A eligibility requirements.

- Timely Upload Following Shutdown. The Fourth Quarter 2018 Issues/Programs Report, Class A Continuing Eligibility Certificate, and Certification of Compliance with Commercial Limits in Children's Programs were timely uploaded to the OPIF once the federal government reopened after shutdown.

- Political File Reconciliation Information. With respect to political file records required by 47 C.F.R. § 73.3526(e)(6) and §73.1943, during the relevant time period, the Licensee was not in the habit of uploading reconciliation information contained in station invoices to the OPIF. *See Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Second Report & Order, 27 FCC Rcd 4535 (2012), ¶ 57. In many cases, credits, rebates, or other changes were captured in revised orders that were timely uploaded. Moreover, in some cases there were no changes between the time of order and the time of air such that certain invoices disclosed no new information than had been previously disclosed (*e.g.*, no rebates, credits issued, or make goods). *See id.* As of late July 2022, the Licensee has uploaded invoices that were previously not present.

The Licensee respectfully submits that the circumstances described in this exhibit should not negatively impact a determination of KPSP-CD's overall compliance with its public inspection file obligations during the license term.

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