

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, January 5, 2015 (the date KION-TV's last renewal application was granted), through the present. *See Fox Television Stations, Inc.*, 33 FCC Rcd 7221 (2018), ¶¶ 31-32. The Licensee notes the following circumstances related to KION-TV's 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 Ownership Reports for 2015 were timely filed and all beneficial owners were timely disclosed.
- Timely Upload Following Shutdown. The Fourth Quarter 2018 Issues/Programs Report and Certification of Compliance with Commercial Limits in Children's Programs were timely uploaded to the OPIF once the federal government reopened after shutdown.
- 2021 EEO Annual Report. The Station's 2021 EEO Annual Report was uploaded on August 3, 2021. As noted in a cover sheet attached to such Report, Station personnel timely prepared and attempted to upload the Report to the Station's OPIF on Monday, August 2, 2021, but they experienced technical difficulties with the OPIF and were unable to upload the Report until the following day.
- 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 typically uploaded reconciliation information contained in Station invoices to the OPIF following the conclusion of a given election (e.g., invoices related to political advertising orders for spots that ran prior to and related to the November 3, 2020 Election were uploaded shortly after Election Day). *See Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Second Report & Order, 27 FCC Rcd 4535 (2012), ¶ 57. Oftentimes, credits, rebates, or other changes were captured in revised orders that were timely uploaded. Moreover, in many 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.*

NPG of Monterey-Salinas CA, LLC
KION-TV, Monterey, CA (Facility ID 26249)
FCC Schedule 303-S

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

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