

EXHIBIT AS TO ONLINE PUBLIC INSPECTION FILE

WJAL is submitting this Exhibit in connection with its response to the Online Public Inspection File Item in the instant Renewal of License application.

In preparing the Renewal of License application, WJAL undertook an examination of its Online Public Inspection File (“OPIF”). As a result, WJAL determined that for the quarterly periods, commencing in Q3 of 2016 and ending in Q3 of 2017, it had failed to upload the Station’s Issues/Programs Reports to its OPIF. WJAL has been able to retrieve the Issues/Programs Reports for Q1 to Q3 of 2017 from cloud storage and has now uploaded them to the WJAL OPIF. However, the Issues/Programs Reports for Q3 and Q4 cannot be located or reconstructed and, as a result, are not available in the OPIF.

In addition, WJAL has determined that the following documents were previously uploaded on an untimely basis:

Commercial Limits for Children’s Programming:

Q1 and Q4 2018 uploaded 5/29/2020 and then 6/1/2020 (with a proper cover page)

Q3 2013 uploaded 10/17/2013 rather than 10/10/2013

Issues/Programs:

Q1 - Q3 2013 uploaded 10/22/2013 rather than 4/10/2013 and 10/10/2013 respectively.

Q4 2012 uploaded on 1/31/13 rather than 1/10/13

WJAL wishes to take note that the bulk of the OPIF late or unfiled items occurred during the time periods when the FCC reverse auction and post-auction procedures were being undertaken. As part of that process, the WJAL spectrum was returned to the Commission, the Station entered into a channel sharing arrangement, and WJAL’s community of license was changed, a substantial distance, from Hagerstown, Maryland to Silver Spring, Maryland. As a

result of these changes, management of WJAL was shifted from one operating group to another. WJAL believes that during this transitional period, there was confusion as to operating responsibilities resulting in the inadvertent failure to prepare and upload the Issues/Programs Reports to the OPIF.

The licensee of WJAL recognizes that it is taking necessary to actions to ensure that any failure to upload documents on a timely basis does not reoccur in the future. Local management has been directed to review and revise its operating procedures necessary to comply with the requirement that the OPIF is properly maintained and submissions are timely made. In addition, the licensee's corporate manager for OPIF compliance has recently left the licensee's employ and will be replaced by a new management team that will undertake greater supervision of Station staff handling the OPIFs in order to ensure compliance. It is the licensee's expectation that as a result of these actions, the WJAL OPIF will be kept complete and up to date in the future.