

**Online Public Inspection File**

The Licensee has certified in the negative to the question asking whether the documentation required by 47 C.F.R. § 73.3526 has been uploaded to the station's online public inspection file (OPIF) when required.

The Licensee uploaded three (3) Class A Eligibility Certifications late while its license renewal application was pending. The Fourth Quarter 2022 Certification was uploaded approximately 42 days late, the Second Quarter 2023 Certification was uploaded approximately 3 months late, and the Third Quarter 2023 Certification was uploaded one day late. The late uploads were due to an oversight of station staff. Compliance with this aspect of the OPIF rule has been reinforced with station staff.

Additionally, the Licensee wishes to explain the following circumstances, which may at first appear to, but do not in fact, impact the timeliness of certain uploads:

- The Fourth Quarter 2018 Certification of Compliance with Children's Commercial Limits, Certification of Continuing Eligibility for Class A Status, and Issues/Programs Report were timely uploaded to the OPIF once the federal government reopened after shutdown.
- The 2019 Annual Children's Television Programming Report was timely filed pursuant to a blanket extension granted by the Media Bureau related to the COVID-19 pandemic.
- The 2017 Biennial Ownership Report was timely filed pursuant to the modified and extended filing window announced by the Media Bureau.
- The 2019 Biennial Ownership Report was timely filed pursuant to the modified and extended filing window announced by the Media Bureau.
- The station had no political advertising requests during the relevant time period.

The Licensee respectfully submits that these upload circumstances may be considered *de minimis* given the station's overall compliance with the OPIF rule.

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