



STATEMENT OF POLICY ON POLITICAL ADVERTISING
February 2, 2020- March 17, 2020

It is the intention of WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am to comply fully with all applicable laws and regulations relating to the use of the station by legally qualified candidates for public office. Our policies regarding political broadcasting are designed to meet all legal requirements. However, to the extent permitted by law, WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am reserves the right to modify this policy at any time. This policy is provided for general information, and is not intended to be a part of any advertising contract. Any advertising contract is governed by law and by its own terms.

CANDIDATES FOR FEDERAL OFFICE. We afford legally qualified candidates for federal elective office reasonable access to WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am by permitting the purchase of reasonable amounts of time for the use of WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am. While WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am do not offer *free* time for political advertising, it makes available for purchase by federal candidates any class of time and time period available to commercial advertisers. Federal candidates may purchase any length of time that WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am determine, on a case-by-case basis, is consistent with law and FCC rules. WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am has no predetermined limitations on the amount of time a federal candidate may purchase or on the time of day in which his/her announcements may appear.

WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am intend to work individually with each federal candidate in an effort to meet his or her needs. In determining what constitutes “reasonable” access, we consider such factors as the amount of time the candidate has already purchased and/or used, the total number of candidates in the race who are likely to buy time, the overall demand for political advertising on WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, WJPF-am/WCIL-am, and potential programming disruption.

STATE AND LOCAL RACES. It is the policy of WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am to keep its viewers informed of opposing candidates’ viewpoints in the state and local elections. Generally, WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am also sells airtime to legally qualified candidates for non-federal public office. However, WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am reserves the right to determine the amount of advertising that it will sell to state and local candidates. Some of the factors we consider in making these decisions include the number and importance of state and local races, the constraints imposed by WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am’s obligation to afford reasonable access to federal candidates, the availability of inventory, and potential programming disruption. WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am may choose not to sell time at all for certain state and local races, or to limit the sale of time to state and local candidates to certain programs or dayparts. Political advertising for all races will be accepted for the 2012 Primary Election.

RATES FOR CANDIDATES. During the period 45 days preceding a primary or primary run-off election and during the period 60 days preceding a general or special election, the charges for us of WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am by legally qualified candidates running in that election are not, under federal law, permitted to exceed the lowest unit charge of WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am for the same class and length of announcement for the same time period. Whether a candidate is entitled to the lowest unit charge for a particular spot depends on the date the spot airs – not when the order is accepted.

Because the prices of spots on WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am are subject to change, the lowest unit charge for a particular length of spot, class of spot and time period may also vary during the 45-day and 60-day pre-election periods. In the event any legally qualified political candidate is charged in excess of the applicable lowest unit charge, whether because of a post-order change in the applicable lowest unit charge or for any other reason, WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am will rebate the excess payment to the candidate, or credit that amount toward a further time purchase should the candidate so desire.

At times when the lowest unit charge is not applicable, the charges for use of WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am by legally qualified candidates may not exceed the charges made for comparable use of WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am by other advertisers.

Lowest unit charges during the pre-election periods apply only to “uses” by *legally qualified candidates*. A “use” is defined as “any positive broadcast of a candidate’s voice or picture.” Lowest unit charge does not apply to third party or independent expenditure advertising, even if the advertisement constitutes a “use,” unless the advertisement is authorized by the candidate. The “use” must be sponsored by the candidate (or if not sponsored by the candidate, must be authorized by the candidate) to qualify for lowest unit charge.

AGENCY PLACEMENT AND DIRECT PLACEMENT. Except for spots sold by the station’s rep firm, WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am’s lowest unit charge is based on the net to WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am. The policy for WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am’s is to charge commissionable for agency placement. Thus if a recognized agency books a spot on behalf of a legally qualified candidate who is entitled to the lowest unit charge, WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am will publish 15% commissionable rates and bill net.

TYPES OF ADVERTISING SCHEDULES. We are pleased to work with candidates and their representatives to ensure that the candidate is aware of and is able to make any purchase of time available to commercial advertisers, according to the schedule the candidate believes would be most advantageous. It is our policy to assist candidates in making informed judgments as to their time purchases by alerting them to the full range of options available. For that purpose, we provide the following information on the various types of purchases WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am’s advertisers may make:

- **Length of Announcements.** WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am makes available for purchase: 60 second spots. Rates are based on units, thus a 30 second spot will be charged as a 60 second spot.
- **Preemptible.** Once accepted by WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am a spot schedule is considered not preemptible. Even schedules that have been accepted are subject to pre-exemption to provide equal opportunity for an opposing candidate.

During the statutory “lowest unit rate” periods, legally qualified candidates may purchase such packages at the lowest price at which such packages are sold to commercial advertisers. In addition, during the pre-election “lowest unit rate” periods, legally qualified candidates may purchase any portion of a package at the package rate, without being required to purchase all parts of the package. For spots airing during a pre-election “lowest unit rate” period, whenever a spot rate included in a package plan is less than the lowest unit rate for the particular length, class and time period in which it is scheduled, the package rate becomes the new lowest unit rate for the same class of time in the same time period. The station will allocate the costs of spots of different classes included in package plans to reflect their true value, in accordance with the policies of the FCC.

- **Current Rate Information** for all of the lengths, classes of time, packages, and rotators offered by WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am is provided to each person who requests information regarding political advertising on WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am. In addition to the current “going rates,” the station also will provide its best, good faith estimate of the lowest unit rates upon any request for information.
- **Make Goods.** It is the policy of WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am to offer all political candidates “make goods,” prior to the election, for candidate “use” spots that are preempted if WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am has offered time-sensitive make goods for the same class of time to any commercial advertiser within the past year. WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am cannot guarantee, however, that time-sensitive make goods can be provided in the time period or rotation originally ordered. If inventory constraints make identical scheduling impossible, WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am will offer make goods of equivalent value. If these are not acceptable to the candidate, WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am will provide credits or refunds for preempted spots.
- **News and Election Day.** WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am does not accept political advertising during newscasts. WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am does not have a news adjacency class of time. WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am does accept political advertising on Election Day.

PREREQUISITES TO BROADCAST. For each political time order, an NAB political broadcast form must be at WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am or WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am’s representative’s office at least 48 hours prior to broadcast. Copies of the current NAB form are available upon request. Tapes must be at WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am at least 24 hours in advance of their first scheduled airing, or no later than close of business Thursday for weekend airing. However, we will do our best to accommodate federal candidates’ requests for reasonable access regardless of notice.

SPONSORSHIP IDENTIFICATION. Under the rules of the Federal Communications Commission and the Federal Election Commission, a sponsorship identification announcement must be given revealing who paid for or sponsored an announcement or program. Candidates and their committees (or an outside party paying for the broadcast) must disclose the true identity of the person or entity by whom or on whose behalf payment is made. **If a political announcement does not contain proper sponsorship identification, the station is required to insert the required sponsorship identification before allowing the spot to air. Since all advertisements must be limited to the amount of time purchased, spots lacking the required identification may be partially overdubbed. If WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am is required to perform such production; normal production charges will be assessed.**

PREPAYMENT AND CREDIT. All political orders, whether direct from the candidate or through a recognized advertising agency, must pay ***cash in advance***.

PRODUCTION FACILITIES. WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am will make its own production facilities available to candidates and their representatives. All inquiries or requests concerning production time and facilities should be made through your sales representative or WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am's production department. Production rates are established on an hourly basis and can be affected by the type and amount of equipment and personnel required for a particular job.

POLITICAL FILE. We maintain a political file of all requests for broadcast time made by or on behalf of candidates for public office, together with materials showing the disposition made by WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am of each such request, any charges made if the request was granted, and the lengths, classes, and day parts purchased. The political file is available for public inspection during regular business hours at WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am's main studio. We retain the records in our political file for a period of two years. If you have any questions about our political file, please do not hesitate to ask.

LIST OF OFFICERS AND DIRECTORS REQUIRED. WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am requires a committee, association, or group that is purchasing political advertising to furnish WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am with a list of its chief executive officers, members of its executive committee, or members of its board of directors. Such lists must be furnished before WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am will grant a request for time. These lists will be available for public inspection at WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am's main studio during regular business hours. These records will be retained in the political file for two years. Political parties purchasing time on behalf of a candidate must provide documentation from candidate naming part on "authorized committee" of the candidate.

PLACING ORDERS. The following persons are available to assist candidates with their radio advertising on WOOZ-fm, WUEZ-fm, WCIL-fm, WXLT-fm, and WJPF-am/WCIL-am.

1. Dawne Montgomery – (National / Regional / Political – Account Executive)
dawne@riverradio.net
2. Steve Falat - MARKET MANAGER

Did you know?

According to a study from the Media Outlet of Voting Behavior and heavy Exposure to Radio, TV and newspaper, **RADIO** reaches the **MOST** active voters.

