

SJ Broadcasting, LLC

[LETTER TO BE SENT TO ALL CANDIDATES/AGENTS WHO REQUEST POLITICAL TIME OR RATES
ATTACH ACKNOWLEDGMENT AND POLITICAL DISCLOSURE STATEMENT]

DATE

NAME

ADDRESS

CITY, STATE, ZIP

Dear Mr./Ms.

The sale of time to legally qualified political candidates is governed by the Communications Act of 1934, as amended, and with the rules and regulations of the Federal Communications Commission ("FCC").

In order to clarify our political broadcasting policies, to protect the legal rights of candidates and the station alike, and to comply with the requirements of the applicable statutes and regulations, our Station has adopted certain policies and procedures with respect to the sale of political advertising.

Those policies and procedures are set forth in the enclosed Political Advertising Disclosure Statement and in this letter. Please read them and familiarize yourself with their contents in order to avoid confusion and misunderstanding concerning political advertising. All sales of advertising time to legally qualified candidates for public office, or their representatives, are made subject to the terms and conditions set forth herein and in the Political Advertising Disclosure Statement.

All rates for "uses" of the Station by legally qualified candidates for public office will be governed exclusively by the Communications Act of 1934 as amended and the rules and regulations of the FCC. Candidates and their agencies may be asked to confirm that the candidate is legally qualified or that particular advertisements are controlled, approved, or sponsored by the candidate. Agencies may be requested to demonstrate proof that they are the authorized representative of the candidate they claim to represent. All times sold by the station are sold in the recognition that the FCC is the sole and exclusive forum for the resolution of all disputes concerning charges for "uses" of the station by legally qualified candidates, subject to judicial review as is provided for by the Act.

In order to confirm your understanding of, and signify your agreement to, political advertising policies of this station, please sign and date the attached "Acknowledgement of Political Broadcasting Policies" as the authorized agent and representative for your candidate, and return it to the undersigned. The second copy is for your records.

Sincerely yours,

SJ Broadcasting, LLC

WSJK-FM, WGKC-FM, WJEK-FM, WQQB-FM

POLITICAL ADVERTISING DISCLOSURE STATEMENT

EFFECTIVE PERIODS:

LUC STARTS 2-4-18

THROUGH 3-20-18

ELECTION DATE: 3-20-2018

INTRODUCTION

Thank you for your interest in purchasing political advertising on Radio Station **WSJK-FM, WGKC-FM, WJEK-FM, WQQB-FM** (the “Station”). It is our desire to furnish you complete information concerning the various advertising rates, policies, and to assist you in making an informed decision concerning the purchase of advertising on our Station. This Disclosure Statement is being provided to you for that purpose.

Our Station intends to comply fully with all applicable laws and regulations relating to the use of this 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, our Station 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.

Should you have any questions concerning this Disclosure Statement, please let us know. We realize that the purchase of broadcast advertising time may be complex. We will be pleased to respond to your questions and to clarify, upon request, the various rate plans and policies described herein. We encourage you to inquire. All inquiries should be directed to: **Pia Atkins**.

1. Equal Opportunity

This Station will afford “Equal Opportunity” within the meaning of the regulations of the Federal Communications Commission (“FCC”) to all legally qualified candidates for the same elective position.

2. Reasonable Access – Federal Candidates Only

Our Station affords legally qualified candidates for federal elective office reasonable access to our Station by permitting the purchase of reasonable amounts of time for the use of the Station. We have no predetermined limitations on the total amount of time a federal candidate may purchase or on the time of day in which his/her announcements may appear. We 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 our Station, and potential programming disruption. Candidates for certain local and state offices will be afforded access to all time units, and all candidates for the same office will be assured equal opportunity in the placement, purchase and amount of time.

3. Candidates For State And Local Office.

We reserve the right to determine the non-federal elections for which our Station will accept political candidate advertising. Our Station reserves the right in its discretion to determine: (1) the particular state and local races for which it will accept political advertising; (2) the number of advertisements it will accept from candidates in a particular state or local race; and (3) whether and what amount of advertising it will accept from state and local candidates in a particular program, day part, or rotation. Some of the factors we consider in making these decisions include the number and importance of state and local races, the constraints imposed by our Station's obligation to afford reasonable access to federal candidates, the availability of inventory, and potential programming disruption.

4. Rates.

a. Use.

Federal law prescribes special restrictions on the rates which radio stations may charge for authorized advertisements which contain "uses" by legally qualified candidates for elective office. A "use" is a non-exempt positive appearance of a candidate whose voice is either identified or is readily identifiable. A candidate is "legally qualified" when he or she has publicly announced an intention to run for nomination or for elective office, is qualified under applicable law to hold the office for which he or she is a candidate, and has either qualified for a place on the ballot or, if seeking election by the write-in method, is eligible and submits a substantial showing that he or she is a *bona fide* candidate for nomination or office.

b. Comparable Rates.

Except during the 45-day period preceding a primary or primary runoff election, or 60-day period preceding a general or special election, the charges for the use of our Station by legally qualified candidates in connection with their campaign will not exceed the charges made for comparable use of our Station by other advertisers.

c. Lowest Unit Charge

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 use of our Station by legally qualified candidates in connection with their campaign are not permitted, under federal law, to exceed the lowest unit charge of the station 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.

Advertising which: (a) does not include the identified or identifiable voice of a legally qualified candidate, (b) which is not controlled, approved, or sponsored by

the candidate or candidate's authorized committee, (c) which is not scheduled to be broadcast during the "lowest unit charge" period, or (d) is not in connection with the candidate's campaign, does not qualify for the lowest unit charge rates.

d. Value Added Features

Advertisers on our Station sometimes purchase value-added elements in conjunction with air time, including, but not limited to, non-broadcast event sponsorships and non-cash promotional incentives (bonuses to the advertiser if certain prospective advertising levels are reached). Our Station does not offer sponsored public service announcements to political candidates. Legally qualified candidates may purchase value-added elements on the same terms, and under the same circumstances, as we make them available to commercial advertisers. However, we reserve the right to not make available particular value added features that are of nominal value or that could imply a relationship between our Station and the political candidate.

e. Package Plans

At any point in time, we offer a number of specialized and/or individually negotiated packages to its advertisers. These packages allow our Station's clients to reach their intended audiences in the most cost-effective way. These packages may, for example, include spots in a number of different programs or dayparts, combinations of fixed and preemptible spots, and so on. Other packages may be time and/or event specific.

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. For spots airing during the 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 lowest unit rate for spots of that length, class and time. In such a case legally qualified candidates may purchase a single spot at that rate, without being required to purchase all parts of the package. We reserve the right to allocate the costs of spots included in package plans to reflect their true value, in accordance with the policies of the FCC.

5. Classes of Time.

Our Station normally sells time in the non-preemptible class. Non-preemptible spots are not subject to being preempted for higher priced spots in the same time period, but may be preempted for technical reasons, breaking news events or other special programming needs of the station. In the event of such a preemption, we will work with the candidate or his agent in scheduling a make good that is acceptable to the candidate. If an acceptable make good cannot be scheduled, the amount paid for the preempted spot will be rebated to the candidate or his or her official committee.

We also sell time in the preemptible without notice class during certain dayparts and time periods. Spots that are preemptible without notice may be preempted without advance notice to the advertiser when that daypart is sold out with higher priced advertising. In the event of such preemption, we will work with the candidate or his agent in scheduling a make good spot that is acceptable to the candidate. If an acceptable make good cannot be scheduled, the amount paid for the preempted spot will be rebated to the candidate or his or her official committee.

6. Time Units Available

Our Station normally sells spot advertising time to candidates in 30 and 60 second units. Some exceptions may apply.

Federal candidates may purchase any length of time that our Station has offered to commercial advertisers during the year preceding the election, and we will consider on a case-by-case basis requests by federal candidates for non-standard lengths of time whether or not sold or programmed commercially by us during the previous year.

7. Periods of Time Available

We normally sell time in specific dayparts and in a broad variety of rotations. The rate card provided to the candidate or his or her agent sets forth the most common dayparts and rotations sold by our Station. The Station offers a number of other alternatives. If there is interest in other alternatives not shown on the rate card, please advise your sales representative, who will be pleased to review specific options with you.

8. Preemption Priority for the Same Class of time

In the event that sales orders for the same class of announcements for the same time period should exceed our Station's available inventory, we will, subject to the equal opportunity requirements for candidates, establish a scheduling priority for the announcements on the following basis.

- a) Outside the lowest unit charge periods, priority will be given to the schedule of announcements purchased by the advertiser that has purchased, in the aggregate, the largest dollar volume of advertising during the calendar year. In the event two or more advertisers have purchased the same dollar volume, the advertiser who purchased the order first will be afforded priority.
- b) During the lowest unit charge periods, political advertisements qualifying for the lowest unit charge will be afforded scheduling parity with advertisements purchased by our Station's most favored commercial advertisers. In the event the purchase orders of a commercial and political advertiser should be considered equal under these criteria, a political advertiser will be afforded priority.

9. Make Good Policy

In the event that an announcement is missed for whatever reason, we will attempt to provide a make good announcement in a comparable time period(s) to achieve an audience level comparable to that which might have been estimated or projected when the order was placed. In these circumstances, if a suitable make good announcement cannot be broadcast, a rebate or credit as the advertiser may elect will be promptly issued.

10. Current Lowest Unit Charge Rate

The rates listed in the attached rate card constitute, as of the current date, the lowest unit charge rate for the various classes and units of time, in the same time periods described above. These rates apply during the 45-day and 60-day lowest unit charge periods prior to such election. We reserve the right to change rates during these periods as permitted by applicable law. It is not always possible to determine the lowest unit charge for any given week until all advertising for that week has been broadcast. Where appropriate, make goods, credits, or rebates, as the advertiser may elect, will be issued. In the event that our Station sells advertising time during the prescribed lowest unit rate for a particular amount and class of time in a particular time period at a rate which is lower than the rate charged a candidate for a "use" for the same amount and class of time in the same time period, our Station will afford the candidate the benefit of the lower rate by means of a rebate or a credit against future purchases, as determined by the candidate.

11. Audience Delivery

Audience guarantees are not provided.

12. Agency and Candidate Commissions

Our Station provides a 15% commission to recognized advertising agencies. Political candidates and authorized campaign committees who purchase time for a use during the lowest unit charge period without an advertising agency will be extended the 15% discount.

13. Political Advertising During News Programs

The Station accepts political advertisements during network or local news programming time periods during the regular commercial breaks.

14. Separation of Competitive Political Advertisements

The policy of our Station is to attempt, where possible, to separate competitive political advertisements. However, that may not always be possible, and our Station does not promise nor warrant that competitive announcements will be separated.

15. Sponsorship Identification

All political advertising must comply with the rules of the Federal Communications Commission and of the Federal Election Commission, as well as with the Bipartisan Campaign Reform Act of 2002 (“BCRA”).

a. Contents for Federal Candidates

At the end of each radio advertisement placed by a federal candidate or his/her authorized committee, there must be a disclosure in which (1) the candidate identifies himself or herself; (2) the candidate states that he or she approved the broadcast, and (3) the candidate states that the broadcast has been paid for by the candidate and/or the candidate’s authorized committee. In addition, If the spot refers to an opposing candidate in any manner, the disclosure must also identify the office being sought.

b. Contents for State and Local Candidates.

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 whose behalf payment is made.

If a political announcement does not contain proper sponsorship identification, our 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 our Station is required to perform such production, normal production charges will be assessed.

16. Federal Candidate Certification; Stand By Your Ad.

Each advertisement placed by a federal candidate or their authorized committee **MUST** provide our Station with a written certification **at the time advertising is purchased**. The certificate may state that the advertising does not refer to another candidate for the same office. Alternatively, if the programming **does** refer to an opposing candidate, the certificate **must** state that the programming will contain, at the end of the spot a statement, in the form specified in the BCRA, in which the candidates personally states that he or she approved the broadcast.

Failure to adhere to these sponsorship identification certification and disclosure will result in the forfeiture by the candidate of all rights to the benefits of the lowest unit charge provision for the remainder of the political window.

17. Order Deadlines

The ordering deadline for traffic and copy orders on our Station is 24 hours before airing traffic copy. Deadline for placing orders Tuesday-Friday is 12PM and for tapes it is 4PM

the day before announcements are to air. Deadline for placing orders Saturday-Monday is 12PM the Friday prior to running and for tapes it is 4PM the Friday before announcements are to air. Our Station's regular ordering deadlines may be waived, where appropriate, to provide an equal opportunity to political candidates and to provide reasonable access to federal candidates.

18. Order Procedures and Payment

Unless credit has been established in advance, payment in full is due at the time of the order, provided, however, that federal candidates are never required to pay more than seven (7) days in advance of broadcast. Candidates who wish to apply for credit should allow ample time processing of the credit application; credit is subject to our Station's normal credit policies. No scheduled time will be considered firm until payment is received or credit established. All political advertisers must provide information concerning the entity or individual who is paying for the advertisement, including the identity of its chief executive officers, or members of its executive committee or board of directors.

Orders must include an executed Agreement for Political Broadcast.

19. Broadcast of Political Ads on Election Day

Our Station will broadcast political advertisements on the day of an election.

20. The Right to Recapture Time

We reserve the right to cancel or adjust the amount of time sold to accommodate special emergency program, or because of technical difficulties or labor disputes, or for other reasons beyond the control of our Station or where necessary to enable our Station, pursuant to the Communications Act of 1934, to satisfy the Equal Opportunity requirements of all legally qualified political candidates. Where such cancellations or modifications are necessary, advertisers will be advised and rebates, credits, schedule changes or other adjustments will be made as may be appropriate.

21. Disclosure Statement is Not An Offer to Sell

This Disclosure Statement does not constitute an offer to sell time nor is it a contract. It is a statement of the policies which our Station in good faith, attempts to follow in connection with the sale and placement of political broadcast advertising. The terms of any actual sale of time are contained in the Sales Contract, and none of the matters in the Disclosure Statement are incorporated by reference in the Sales Contract.

22. Production Facilities.

The Station will make its 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 our Station'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.

23. 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 our Station 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 hours at our Station'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.

24. List Of Officers And Directors Required.

We require a committee, association, or group that is purchasing political advertising to furnish our Station 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 our Station will grant a request for time. These lists will be available for public inspection at our Station's main studio during regular business hours. These records will be retained in the political file for two years

25. Disputes

The Communications Act of 1934, as amended, establishes certain requirements of the sale of broadcast advertising time for the use, by or on behalf of political candidates. The FCC has adopted rules and policies to implement those requirements and has asserted its exclusive jurisdiction to enforce the Communications Act. Complaints concerning the sale of political advertising by our Station should therefore be filed with the FCC, subject to judicial appeal as provided for in the Communications Act. The FCC's resolution of such complaint, subject to such judicial review as is provided by the Communications Act, provides the sole and exclusive remedy for such complaints.

26. Further Information

Our Station will provide upon request further information about rates and advertising policies. We encourage prospective political advertisers to inquire. It is our desire to furnish all appropriate information to those interested in purchasing political advertising on our Station to assist in communicating your message within our service area.

POLITICAL RATE CARD

WSJK-FM / WGKC-FM / WJEK-FM / WQQB-FM

Effective: 2-4-2018

VALID UNTIL 3-20-18 OR SUPERCEDED

Rates available
ONLY
for Authorized Uses
by Legally Qualified Candidates
in Connection with their Campaign

The attached rates are examples of the most commonly requested lengths, classes, and time periods provided by our Station. Other classes, lengths and time periods are available and can be provided upon request. The Station provides Reasonable Access to all candidates for Federal elective office.