

**AUDACY LICENSE, LLC RADIO STATIONS**  
**POLITICAL DISCLOSURE STATEMENT**

**FOR [STATION(S) FOR WRVA-AM/FM – WTVR-FM – WRVQ-FM – WRXL-FM –**  
**WBTJ-FM – WRXL-FM/HD2-BIG 98.5 – WRNL-AM/FM**  
**(Effective On and After: January 9, 2024)**

In accordance with the rules and regulations of the Federal Communications Commission (the “FCC”), the following sets forth the policies and practices with respect to the sale of advertising (“Advertisements” or “Advertising”) on **WRVA-AM/FM – WTVR-FM – WRVQ-FM – WRXL-FM – WBTJ-FM – WRXL-FM/HD2-BIG 98.5 – WRNL-AM/FM** (the “Station”) for any “use” by legally qualified political candidates or their authorized representatives (“Candidate(s)”). The practices described herein are subject to change that the Station’s discretion, to the extent permitted by law.

1. **Applicability:** The Station complies with the law in selling time to Candidates. Accordingly, we provide reasonable access to Station facilities for all legally qualified federal candidates. However, we reserve the right to determine the non-federal candidates to whom we will sell time. Once time is sold to a federal or non-federal candidate, equal opportunity rights are afforded to all legally qualified opponents of that Candidate.
2. **Applicable Races:** The Station will be providing reasonable access for the following races:
  - All federal races; and
  - All state and local races
3. **Access:**
  - a) For Federal elections: The Station will provide reasonable access to all federal Candidates. While Federal Candidates may request specific programming, the Station reserves the right to determine the amount of time and program availability to particular Candidates.
  - b) For state and local elections: It is the general policy of the Station to attempt to keep its listeners informed of opposing Candidates’ viewpoints in state and local elections. However, the Station reserves discretion 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 Station’s obligation to afford reasonable access to federal Candidates, the availability of inventory, and potential programming disruption. The Station 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 races, or to limit the sale of time to state and local Candidates to certain programs or dayparts.
  - c) Advertisements may be purchased individually or in designated rotations among several designated days or time periods.
4. **Identification:** All Advertisements must comply with the sponsorship identification requirements of FCC Rule 73.1212 and Section 311 of the Bipartisan Campaign Finance Reform Act of 2002 (“BCRA”). Should a Candidate Advertisement not contain the proper sponsorship identification, the Station reserves the right to add the appropriate material within the body of the Advertisement, even if it covers advertising content, and to bill the Candidate for any production costs incurred by the Station.
5. **Orders:** Orders for Advertising time must provide or adhere to the following:
  - a) Completed and signed agreement form for political broadcasts (NAB Form PB-18, PB-19 or equivalent);

- b) When the order is made by a corporation, committee, association or other unincorporated group, a list of the entity's chief executive committee or board of directors;
- c) Where doubt exists, satisfactory proof that the Candidate is "legally qualified," as that term is defined by the Federal Communications Commission;
- d) Where doubt exists, satisfactory proof that the purchaser is authorized to buy time for the Candidate;
- e) All Advertising orders are subject to the Station's normal credit policies. Unless the order is being placed by an agent or other entity with a proven credit history with the Station, we require all new advertisers and all advertisers in volatile businesses or those whose operations are intermittent or of limited duration, including political candidates, to pay for all spots in the form of credit card, certified or cashier's check, money order, wire transfer or cash in the full net amount of the schedule being ordered in advance of the schedule's commencement. Contact the Station for access to the Station's pay portal. We must receive all payments by 3pm the business day prior to air date.
- f) The recording of the Advertisement, along with written traffic instructions for use, should be submitted to the Station as soon as possible to ensure proper airing. All instructions for airing of commercials should be in writing. Changes to these instructions should be in writing to the Station (by email) prior to the changes being made. Commercials should be received in sufficient time to permit confirmation of compliance with sponsorship identification requirements and with broadcast technical standards.
- g) **All Advertisements must be received by 3pm local station time the business day prior to airing (i.e., all Advertisements to run on Saturday, Sunday or Monday must be received by 3pm on Friday), including all required paperwork, must be received by the Station no later than 24-hours prior to air date. Completed paperwork (e.g., NAB PB-18, PB-19 or equivalent) must be received at the time the order is requested.**

Failure to fulfill all requirements in advance of the above-listed deadlines may result in preemption of some or all Advertisements. The Station cannot guarantee make-goods for schedules which do not air due to a delay in receipt of Advertisements. Confirmation of broadcast or changes to Advertising schedules as ordered will be sent to the Candidate as soon as commercially possible, but will be available upon request at any time.

**6. Production:** Station on-air and/or voice talent may not be utilized for production of political Advertisements.

**7. Availabilities:**

- a) Candidates may purchase time on the basis of any class as described in more detail below, subject to availabilities. The base availabilities are thirty-second and/or sixty-second Advertisements. Requests for program time, including thirty-minute and sixty-minute lengths, will be considered on an individual basis. Rates for multi-station packages or narrowed or other dayparts or rotations that Station makes available to its commercial advertisers are available upon request.
- b) Unless a contrary result is dictated by statutory requirements, Advertising orders made after [3pm on the day preceding Election Day] may not be filled due to lack of availability.
- c) **Advertisements will air not later than [7 pm] on Election Day.**
- d) If the Station carries sports play-by-play, inventory may be limited during play-by-play, as well as pre- and post-game coverage. If necessary, Candidates should discuss alternative options with the Station.

**8. Rates:**

- a) The Station typically sells thirty-second and sixty-second spots and the Station's Political Rate Card only includes rates for thirty- and sixty-second spots. Candidates may inquire about different spot lengths. A description of various classes of advertising time offered to commercial advertisers is provided below.
- b) Rates for most classes of time may vary on a weekly basis, based upon supply and demand. During the 45 day period before a caucus, primary or primary run-off election and the 60 day period prior to a special or general election (each, a "Political Window"), the ultimate charge provided to eligible Candidates will in no event exceed the lowest unit rate (the "LUR") paid by any other advertiser for spots of the same class and length and for the same daypart or rotation which actually run during the same rate period as the Candidate Advertisements. To receive the LUR, the Candidate's voice must appear in the Advertisement and Federal Candidates must provide to the Station the written certification required under Section 305 of BCRA, and adhere to that certification throughout the campaign. The LUR is only available for Candidate Advertisements that run during an applicable Political Window. At other times, Candidates will be charged rates, and receive the same opportunities to negotiate individual packages, that commercial advertisers on the Station receive. The LUR policies do not apply to "soft money" announcements (announcements not endorsed or sponsored by the candidate but rather by a third party) or for any form of "issue" advertising.
- c) The Station will provide a good faith assessment of the LUR for each class of time upon request.
- d) In addition to the rates described in this statement, the Station carries advertising spots in connection with network or syndicated operations and/or programming, and also sells spot time in combination with other stations in this market. Information concerning these network or syndicated rates is available from the network or syndicator. Information concerning the rates and availabilities for local combination buys will be provided upon request.
- e) **Rates reflected on the Station's Political Rate Card are gross rates. During a Political Window, all Candidates are entitled to an allowance of an agency commission regardless of whether or not they are represented by an agency.**

**9. Classifications:** The Station offers the following general classes of time:

- a) **ROS (Run-Of-Schedule Spots).** ROS spots are scheduled after all other spots have been scheduled to run during the rotation identified. ROS spots are not guaranteed to run in any particular daypart. The Station offers ROS spots in a variety of rotations. They are scheduled by computer, based on the Station's avails. They are the first paid spots to be preempted and the probability of clearance varies constantly based on supply and demand. The Station attempts to provide make-goods for ROS spots, but due to inventory constraints, cannot guarantee that such spots can be made good.
- b) **Non-Preemptible Spots Aired During Specific Rotations/Programs:** These spots will run in accordance with the terms of the contract/order accepted by the Station, except in the event of unforeseen program changes or technical difficulties. The Station sells non-preemptible spots for a variety of dayparts, programs and rotations, including, without limitation, those listed in the Station's Political Rate Card. Non-preemptible rates for these dayparts and for particular programs are subject to change on a weekly basis, based upon supply and demand.
- c) **Preemptible Spots Aired During Specific Programs/Dayparts:** These spots are not guaranteed to run, and may be preempted without notice. These spots are sold to commercial advertisers with the understanding that they will run, unless the Station sells out its inventory in a particular program or daypart. Accordingly, the probability of clearance varies constantly based on supply and demand.

Generally, whether a commercial advertiser preemptible spot will be preempted depends on the price of a spot, length of a flight, and make-up of the schedule purchased. The Station sells immediately preemptible spots for a variety of dayparts, programs, and rotations, including, without limitation, those listed in the Station's Political Rate Card. The Station's attempts to provide make-goods for these preempted spots, but due to inventory constraints, cannot guarantee that such spots can be made good.

Because rates and clearance probabilities for these spots change frequently, Candidates should contact the Station to receive the current rates and information on the likelihood of preemption.

The Station's Political Rate Card only represents typical dayparts/classes that may be available on the Station but are not the only available dayparts/classes available. Candidates are encouraged to discuss their particular requirements with the Station's political account representative. The Stations will negotiate rotations other than those listed if requested by the Candidate.

10. **Rebates:** If the Station sells advertising time to a Candidate during the Political Window for a particular amount and class of time at a rate in excess of the rate charged another advertiser for the same amount and class of time in the same time period which clears as scheduled, the Candidate will be afforded the benefit of the lower rate by means of a rebate, a credit against future purchases, or a refund of the difference, as determined by the Candidate. No adjustments will be made for purchases not subject to the LUR requirements.
11. **Make Goods:** The Station will use its best efforts to provide make good Advertisements prior to the election for Candidate Advertisements that are preempted. Although the Station's policy is to offer all Candidates make goods prior to the election, it cannot guarantee to any Advertiser (either commercial or political) that the make goods can be provided in the time period or rotation originally ordered. If inventory constraints preclude such identical scheduling, the Station will offer make goods of equivalent value. If these make goods are not acceptable to the Candidate, the Station will provide a credit or refund for the value of the preempted Advertisements, at the option of the Candidate.
12. **Packages and Value Added Features:** The Station offers individually negotiated packages that may include, for example, combinations of spots in various dayparts, bonus and discount overnight and/or ROS spots. Sponsorship packages which would imply a relationship between the Station and a candidate are not available to Candidates. In addition, non-cash incentives of *de minimis* value or which would imply a relationship between the Station and a candidate, which may be available in some package plans, are not available to Candidates. All other packages that are made available to commercial advertisers are available to Candidates. However, the LUR for all dayparts and rotations is calculated to reflect all package discounts to ensure that Candidates receive the LUR for all spots scheduled to air during the Political Window regardless of whether the Candidate buys an entire package.
13. **Contact Information:** The following persons are available to assist Candidates with their radio Advertising needs:
  - For advertising on WRVA-AM/FM – WTVR-FM – WRVQ-FM – WRXL-FM – WBTJ-FM – WRXL-FM/HD2-BIG 98.5 – WRNL-AM/FM, please contact: **Denny C. O'Shea, Political Sales Director, at our Audacy Richmond offices, at (804) 474-0070 or via cell phone at (804) 564-3056.**
  - If primary contact is unavailable please contact: **Carrie Todd, our SVP, at (804) 474-0077, or at (804) 426-3328.**