

KLOG / KUKN / The Wave
Washington Interstate Broadcasting
Statement of Policy on Political Advertising

It is the intention of KLOG / KUKN / The Wave (WIB) to comply fully with all applicable laws and regulations relating to the use for 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, WIB 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 WIB by permitting the purchase of reasonable amounts of time for the use of WIB. While WIB does 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 WIB determines, on a case-by-case basis, is consistent with law and FCC rules. WIB 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.

WIB intends 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 WIB, and potential programming disruption.

State and Local Races It is the policy of WIB to keep its viewers informed of opposing candidates’ viewpoints in state and local elections. Generally, WIB also sells airtime to legally qualified candidates for non-federal public office. However, WIB 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 WIB obligation to afford reasonable access to federal candidates, the availability of inventory, and potential programming disruption. WIB 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.

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 use of WIB by legally qualified candidates running in that election are not, under federal law, permitted to exceed the lowest unit charge of WIB 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 WIB 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 post-order change in the applicable lowest unit charge or for any other reason, WIB 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 WIB by legally qualified candidates may not exceed the charges made for comparable use of WIB 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

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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, WIB’s lowest unit charge is based on the net to WIB. Thus, for example, if WIB’s commissionable lowest unit charge for a particular advertisement is \$100, and a recognized agency books a spot on behalf of a legally qualified candidate who is entitled to the lowest unit charge, WIB will net \$85 from the sale of that spot (\$100 less the normal 15% agency commission). WIB’s lowest unit charge for a spot of the same class, length and time period will therefore be \$85 for candidates who wish to make a “direct” buy.

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 WIB’s advertisers may make:

- **Length of Announcements.** Generally, WIB makes available for purchase airtime in the following lengths: 60 seconds, 30 seconds, and 15 seconds. As stated above, WIB will make other lengths of time available to candidates for federal office on a case-by case basis, consistent with law and FCC rules.

- **Classes of Time.** Generally, WIB makes available the following classes of time:

AM DRIVE	M-F 6a-10a
MIDDAY	M-F 10a-3p
PM DRIVE	M-F 3p-7
PRIME	M-F 6a-7p
EVENING	M-F 7p-12m
WEEKENDS	Sat Sun 6a-7p
ROS	M-Su 6a-Mid
OVERNIGHT	M-Su Mid-5a

- **Preemptible:** These spots carry the risk of being preempted in order to run other spots, for which a higher price is paid.
- Candidates may purchase “preemptible” ads at the lowest unit charge or at a higher rate so as to decrease the potential for preemption. In the event that a candidate purchases a preemptible spot at a higher rate to air during a statutory “lowest unit rate” period, and the station sells a spot of the same length and preemptible class that airs during the same time period for a lower rate, the candidate will be afforded the benefit of the lower rate either by way of a timely rebate or as credit against future purchases, at the option of the candidate.

The likelihood of preemption of the various classes of time is generally consistent with the following chart. However, these percentages can change. If the chances of preemption vary significantly from the values listed below, the station will offer its best, good faith estimate of the likelihood of preemption of various classes of spots when inquiries are made.

Class of Time		Likelihood of Preemption	Likelihood of Preemption
		Fixed Position	Preemptible
AM DRIVE	M-F 6a-10a	Less than 1%	About 60%
MIDDAY	M-F 10a-3p	Less than 1%	About 60%
PM DRIVE	M-F 3p-7	Less than 1%	About 60%
PRIME	M-F 6a-7p	Less than 1%	About 60%
EVENING	M-F 7p-12m	Less than 1%	About 40%
WEEKENDS	Sat Sun 6a-7p	Less than 1%	About 40%
ROS	M-Su 6a-Mid	Less than 1%	About 30%
OVERNIGHT	M-Su Mid-5a	Less than 1%	About 5%

- **Current rate information** for all of the lengths, classes of time, offered by WIB is provided to each person who requests information regarding political advertising on WIB. 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 WIB to offer all political candidates “make goods,” prior to the election, for candidate “use” spots that preempted if WIB has offered time sensitive make goods for the same class of time to any commercial advertiser within the past year.
- **News, sports and Election Day.** WIB does not accept political advertising during newscasts, sportscasts or play by play sports programming. WIB does accept political advertising on Election Day.
- **Trade barter Ads.** WIB does not allow the use of any commercials that were purchased through trade or barter with WIB.

Prerequisites to Broadcast. For each political time order, an NAB political broadcast form must be at WIB office at least 72 hours prior to broadcast. Copies of the current NAB form are available upon request.

Tapes, CDs or MP3s, must be at WIB 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 purchase, spots lacking the required identification may be partially overdubbed.**

Prepayment and Credit. All political orders, whether direct from the candidate or through a recognized advertising agency, are subject to normal WIB credit policies. Candidates who wish to apply for credit should allow ample time for processing of the credit application. Unless credit is extended, advance payments must be made at least three (3) days prior to the first scheduled broadcast of the flight. Federal candidates cannot be required to pay more than three (3) days in advance. Regardless of these policies, we will do our best to meet the reasonable needs of federal candidates for access immediately before the election.

Production Facilities. WIB 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 WIB production department.

Political File. We maintain a political file of all request for broadcast time made by or on behalf of candidates for public office, together with materials showing the disposition made by WIB of each such request, any charges made if the request was granted, and the lengths, classes, and dayparts purchased. The political file is available for public inspection during regular business hours at WIB main studio. We retain records in our political file for a period of two years. If you have questions about our political file, please do not hesitate to ask.

List of Officers and Directors Required. WIB requires a committee, association, or group that is purchasing political advertising to furnish WIB 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 WIB will grant a request for time. These

lists will be available for public inspection at WIB main studio during regular business hours. These records will be retained in the political file for two years.

Placing Orders. The following persons are available to assist candidates with their advertising on WIB: Joel Hanson, John Paul, and Vern Foster

