



2815 East 37th Street North Wichita, KS 67219 | 316.838.1212

STATEMENT OF POLICY ON POLITICAL ADVERTISING

It is the intention of KWCH and affiliated stations, to comply fully with all applicable laws and regulations relating to the use of the Stations 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, KWCH and affiliated stations reserve 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.

KWCH-TV, a CBS affiliate, is licensed to the Wichita-Hutchinson market. KWCH oversees satellite stations KBSH-TV in Hays, Kansas, KBSD-TV in Dodge City, Kansas, and KBSL-TV in Goodland, Kansas. KWCH also operates KSCW-TV, the market's CW affiliate, and Spanish language, KDCU, the market's Univision affiliate, through a joint sales agreement with Entravision Communications Corporation. KWCH and affiliated stations are owned by Gray Communications.

CANDIDATES FOR FEDERAL OFFICE We afford legally qualified candidates for federal elective office reasonable access to KWCH and affiliated stations by permitting the purchase of reasonable amounts of time for the use of our properties. While we 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. In addition, federal candidates may purchase any length of time that KWCH and affiliated stations determines, on a case-by-case basis, is consistent with law and Federal Communications Commission rules. KWCH and affiliated stations have no predetermined limitations on the amount of time a federal candidate may purchase, on the time of day in which his/her announcements may appear or on the length of time requested.

KWCH and affiliated stations intend to work individually with each federal candidate in an effort to assess their advertising campaign 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 KWCH and affiliated stations, and potential programming disruption.

STATE AND LOCAL RACES It is the policy of KWCH and affiliated stations to keep its viewers informed of opposing candidates' viewpoints in state and local elections. Generally, KWCH and affiliated stations also sell airtime to legally qualified candidates for non-federal public office. However, KWCH and affiliated stations reserve 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 KWCH and affiliated stations obligation to afford reasonable access to federal candidates, the availability of inventory, and potential programming disruption. KWCH and affiliated stations 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 KWCH and affiliated stations by legally qualified candidates running in that election are not, under federal law, permitted to exceed the lowest unit charge 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 when the spot airs, not when the order is accepted.

The rates shown on our political rate card during the period to which the lowest unit rate rules apply represent an estimate of the lowest unit rate applicable to a particular time period and class of commercial inventory. Candidates entitled to the lowest unit rate will ultimately be charged the lowest unit rate regardless of whether it is higher or lower than the estimated amount. In the event the estimated amount exceeds the lowest unit rate, KWCH and affiliated stations will rebate the excess payment to the candidate or credit that amount toward a further time purchase should the candidate so desire. In the event the estimated amount is less than the lowest unit rate, the candidate will be required to pay the shortfall; provided, we will use commercially reasonable efforts to inform the candidate of the likelihood of any such anticipated shortfall at least 48 hours in advance of the airing of any use with respect to which the lowest unit rate to be charged for such use exceeds the estimate therefore by more than 25 percent.

In the case of a candidate for federal office, such candidate shall not be entitled to receive the lowest unit charge unless the candidate provides a written certification to KWCH and affiliated stations that the candidate (and any authorized committee of the candidate) shall not make any direct reference to another candidate for the same office in any broadcast unless at the end of such broadcast there appears simultaneously, for a period of no less than four (4) seconds, (i) a clearly identifiable photographic or similar image of the candidate; and (ii) a clearly readable printed statement identifying the candidate and stating that the candidate has approved the broadcast and that the candidate's authorized committee paid for the broadcast. In addition, any candidate who provides such a certification, but nonetheless makes a broadcast which does not meet the disclosure requirements referenced above, shall thereafter not be entitled to receive the lowest unit charge.

At times when the lowest unit charge is not applicable, the charges for use of KWCH and affiliated stations by legally qualified candidates may not exceed the charges made for comparable use 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

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"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 The lowest unit charge is based on the net to KWCH and affiliated stations. For example, if KWCH and affiliated stations 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, we will net \$85 from the sale of that spot (\$100 less the normal 15% agency commission). Our 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 our advertisers may make:

LENGTH ON ANNOUNCEMENTS Generally, KWCH and affiliated stations make available for purchase airtime in the following lengths: 60 seconds, 30 seconds, 15 seconds, and 05 seconds. [Our rates are based on a 30-second spot. Thus, the rate for a 60-second spot is twice the 30-second spot rate; the rate for a 15-second spot is 65% of a 30-second spot rate. 05-second rates are offered as a different distinct rate and class of time.] As stated above, we 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 DEFINED KWCH and affiliated stations [dba KWCH, KBSD, KBSH, KBSL, KBSS, MWCH, KSCW, & KDCU] negotiates from a pre-emptible rate card. Rates are adjusted and subject to change based upon stations' ability to respond to inventory demand and competitive dynamics within the marketplace. Advertisers and advertising agencies have the opportunity and are encouraged to work with their account managers to select a class of time most suitable for their campaigns and contracts. Clients should choose the best level of preemption protection based on current and forecasted market conditions. The following classes of time are available to both commercial advertisers, issue, and political candidates

All spots are prioritized - ranked from greater to lesser importance and coded with appropriate time and priority classifications. The greater the priority the less chance for preemption. Different classes of time and their priority codes have different definitions, rules for preemption, and makegood options. Please adhere to the following:

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KWCH and affiliated stations make available the following classes of time. () indicates booking code for Wide Orbit traffic system:

- **Priority 1 (P2) Non Preemptible:** These spots are guaranteed to air at the scheduled time or during a set time period, except in the event of unforeseen program changes or technical

difficulties. Spots in this class of time for News and programming are day specific and non preemptible.

- **Priority 2 (P3) Standard:** Spots of this level are generally preempted only by Priority 1 spots. The likelihood of clearance at this level, therefore, is relatively high. Candidate Preferred usually provides 95-100% or greater clearance. Spots are pre-emptible with 24 hours notice and makegoods offers will be provided. In periods of high demand, P2 is the designated “bump” rate when time periods are sold out at P3 and P4.

Priority 3 (P4) Standard Advertiser Fixed Annual Rate: Spots of this level are generally preempted by Priority 1 and Priority 2 spots. An advertiser can expect 85-100% clearance, save for high demand periods throughout the year. Priority 3 rates equal the station’s effective average commercial advertising rate for quarterly, semi-annual, and annual negotiations. Spots within this class of time are pre-emptible with 48 hours notice and makegood offers will be provided, inventory allowing, but not guaranteed.

- **Priority 4 (P5) Fixed and Rotations Immediately Pre-emptible Rate:** These spots are always immediately pre-emptible at any time to with no guarantee that the station will attempt to notify the advertiser of the preemption or provide makegood offers. Priority 4 spots may be preempted at any time to accommodate the airing of any spots purchased in a higher class of time. Priority 4 represents stations lowest fixed rate. Rotations are also a sub set classification of Priority 4 time and are immediately preemptible. No makegoods will be provided or attempts to reschedule rotators in additional time periods will be guaranteed should a rotator get preempted. Rotators are immediately pre-emptible without notice and without any guarantee of makegood offer.
- **Package/Sponsorship (P6):** Spots of this level are generally preempted by Priority 1 and 2 spots. PKG/SPR designates packages i.e. Kansas Proud and sports and special sponsorships. An advertiser can expect 80-100% clearance, save for high demand periods throughout the year. Package/Sponsorship/Combo rates equal the station’s average commercial advertising rate for select advertising sponsorships, special opportunities, and sports packages. Spots within this class of time are pre-emptible with 24 hours’ notice and makegood offers will be provided, inventory allowing, but not guaranteed. Advertisers can expect preemptions during periods of high demand. Spots in this class of time are available to political candidates.

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- **Trade (P7):** These spots are designated as trade, an exchange of airtime by the station with an advertiser for products and/or services. Trade is non-pre-emptible and should not be scheduled during high demand times throughout the year. Trade is limited and subject to approval by management. Station will endeavor to makegood trade inventory allowing. Please note: products and/or service should not be used unless the station has fully satisfied trade agreement with advertiser.

- Under delivery (P9):** These spots are preemptible as needed. Under delivery spots are schedule as the result of a shortfall in agreed upon rating estimates. Both the advertiser and the station will agree upon estimated ratings, audience estimates, and/or impressions for each program and/or campaign purchased at the time of the negotiation. The rating delivery of the advertiser's schedule will be measured by both the agency and the station. The station will utilize Nielsen ratings in HH's or demos for the month of the year in which the advertising is placed. If the Nielsen surveys indicates that the station's delivery is less than 90% of the agreed upon estimated audience delivery, the difference of the two shall be deemed audience under delivery. For clients wishing to post to 100% audience delivery station, the station, and only station, will determine estimated audience delivery at the time of the negotiation. Upon the advertiser's request, the station will provide compensatory spots at no additional cost to satisfy any audience under delivery. The advertiser may request under delivery up to three months after the quarter in which the schedule ran. The station will attempt to offer spots for under delivery in the same dayparts and/or programs originally ordered, however, the station may need to offer alternative dayparts and/or programs. The station may also need to schedule under delivery in broadcast weeks in which inventory demand is less and allows for under delivery to air.

The station reserves the right to post consecutive cumulative quarters for annual clients. No under delivery schedules will be placed for schedules not paid in full within 90 days of airing. Agency and/or Advertiser must subscribe to Nielsen in order to request posting reports from stations. Station(s) can also provide post analysis using negotiated Rentrak ratings. Station will only post to Wichita-Hutchinson Nielsen and/or Rentrak data – not Kansas City, Omaha, Oklahoma City, or Tulsa overnights as station does not subscribe to Nielsen or Rentrak data for adjacent market overnights. Station will provide addition impressions for any short falls agreed upon for digital campaigns. Unless otherwise negotiated stations will only post to the agreed upon impressions, not CTR click through rates or CPA cost per acquisition. Advertiser may request under delivery up to three months after the quarter in which campaign ran. Advertisers must be in good standing with stations – no under delivery schedules will be placed for past due invoices. For all digital impressions ordered the station will provide a monthly invoice and campaign summary of CTR and ordered vs. delivered impressions.

VALUE ADDED ELEMENTS Advertisers on KWCH and affiliated stations sometimes purchase value-added elements in conjunction with air time, including, but not limited to, "combination print ads" in direct mail station advertisements or magazine supplements; non-broadcast event sponsorships; and non-cash

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promotional incentives (bonuses to the advertiser if certain prospective advertising levels are reached). Legally qualified candidates may purchase value-added elements on the same terms, and under the same circumstances, as KWCH and affiliated stations make them available to commercial advertisers.

CURRENT RATE INFORMATION For all of the lengths, classes of time, packages, and rotators offered by KWCH and affiliated stations are provided to each person who requests information regarding political advertising on KWCH and affiliated stations. In addition to the current demand and "going rates," KWCH and affiliated stations will also provide its best, good faith estimate of the lowest unit rates upon any request for information.

MAKEGOODS It is the policy of KWCH and affiliated stations to offer all political candidates "makegoods," prior to the election, for candidate "use" spots that are preempted in P1 and P2 classes of time. KWCH and affiliated stations have offered time-sensitive make goods for the same class of time to any commercial advertiser within the past year. KWCH and affiliated stations 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, stations will offer make goods of equivalent value. If these are not acceptable to the candidate, stations will provide credits or refunds for preempted spots.

NEWS AND ELECTION DAY KWCH and affiliated stations do accept political advertising during newscasts. Stations do not have a news adjacency class of time. KWCH and affiliated stations do accept political advertising on Election Day. Please remember to adhere to order and log deadlines.

PREREQUISITES TO BROADCAST For each political time order, a NAB PB-18 political broadcast form must be at the KWCH office at least 48 hours prior to broadcast. Copies of the current NAB form are available upon request. Creative for candidate or issue must be 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. For additional information or FTP site questions please contact traffic@kwch.com and/or Lynn Wilken, Traffic Manager at 316.831.6038.

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, KWCH and affiliated stations are 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 KWCH and affiliated stations are required to perform such production, normal production charges will be assessed.**

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PREPAYMENT AND CREDIT All political orders, whether direct from the candidate or through a recognized advertising agency, are subject to KWCH and affiliated stations credit policies. All Political and Issue advertisers are subject to net cash in advance of schedule airing. Order will not be considered firm without payment. Federal candidates cannot be required to pay more than seven (7) 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 KWCH and affiliated stations 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 the 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 and/or non-candidate issue advertisers, together with materials showing the disposition made by KWCH and affiliated stations 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 KWCH'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.

KWCH | KSCW | KDCU 2815 East 37th Street North Wichita, KS 67206

Business Hours: M-F 8:30 a.m. to 5:30 p.m.

Additionally, for your convenience, the political file can be access online for your review at www.fcc.gov

LIST OF OFFICERS AND DIRECTORS REQUIRED KWCH and affiliated stations require a committee, association, or group that is purchasing political advertising to furnish us 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 we will grant a request for time. These lists will be available for public inspection at the main studio during regular business hours and will be posted online for public access at www.fcc.gov. These records will be retained in the political file for two years.

PLACING ORDERS & CONTACTS The following person is available to assist candidates with their television advertising on KWCH and affiliated stations:

Brett Beach, Director of Sales
2815 East 37th Street North
Wichita, KS 67206
316.832.4020
bbeach@kwch.com