



APPLICABILITY

WDEF policies with regard to political advertising apply **only** to legally qualified candidates for public office, or their authorized campaign organizations, to promote their candidacy through advertising “uses”; they are **not** applicable to political action committees, political parties, third-party endorsements, or non-candidate “issue” advertising.

ACCESS

Reasonable access will be provided to all legally qualified candidates for federal office during the forty-five (45) days preceding the Primary Election, the sixty (60) days preceding the General Election. Political announcements and programs will be aired up to 6:57 p.m. on Primary Election Day and General Election Day.

Legally qualified federal candidates may purchase advertising in all available programming, from all classes of time, as set forth on the rate card. WDEF will accept political advertising for all races within and adjacent to its regularly scheduled news programming; however, news sponsorships are not available to any political candidate.

IDENTIFICATION

All political advertisements must comply with the sponsorship identification requirements of Section 317 of the Communications Act and with other applicable federal and state laws. All announcements must include video (:04) “paid for by” segments. The Federal Communications Commission has determined that ALL of the letters in this identification must equal four percent of the vertical picture height (20 scan lines). Should production be necessary to bring the announcement into compliance with FCC guidelines, production costs will be billed to the candidate at the station’s prevailing commercial production rates. WDEF will not add time to the length of a spot to accommodate sponsorship ID.

WDEF will measure actual scan lines; therefore, the size of the font used during production may not be applicable. We strongly recommend that each political advertiser use the scan line method to determine the acceptability of their respective announcements.

WDEF expects all Federal candidates to comply with the requirements of the Bipartisan Campaign Reform Act of 2002 and all policies and regulations implemented there under.

ORDERS

Orders for political time may not be considered firm until the following have been provided:

- a. An **Agreement Form for Political Broadcasts**, completed and signed by the candidate or his/her authorized representative. WDEF prefers the use of NAB Form PB-19 or newer; copies are available from the Station;
- b. Net payment three (3) working days prior to air date. WDEF will evaluate requests from candidates for credit on the same basis as it uses to evaluate such requests from similarly situated commercial advertisers. As of January 1, 2020, all credit card payments will be charged a 2.99% business processing fee. Candidates are offered the option of paying by ACH bank transfer (no fee involved). We do require notification from client when making these payments. Instructions provided on request;
- c. When the purchase is made by a corporation, committee, association, or other unincorporated group, a list of the entities' chief executive committee or board of directors;
- d. Where doubt exists, WDEF may require satisfactory proof that the candidate is "legally qualified", as that term is defined by the FCC.
- e. Where doubt exists, WDEF may require satisfactory proof that the purchaser is authorized to buy time for the candidate.
- f. Advance orders for schedules of political advertising will be subject to reconfirmation thirty (30) days preceding start of the schedule.
- g. Commercial facilities (copy), along with written instructions for their use, should be submitted to WDEF as soon as possible to ensure proper airing. All instructions for airing of facilities should be in writing. Changes to these instructions should be in writing to WDEF prior to the changes being made. Copy should be received in sufficient time to permit confirmation of compliance with sponsorship identification requirements and with broadcast technical standards.
- h. WDEF will endeavor to accommodate all changes in broadcast traffic as early as possible; however, we cannot guarantee that last minute changes will be made. We can generally complete all changes up to 12:00 noon for the next day's business (Thursday for Friday; Friday for Saturday, Sunday and Monday).

Failure by a political advertiser to fulfill all requirements in advance of some deadlines may result in cancellation of some or all announcements or programs previously cleared.

PRODUCTION

WDEF facilities may be utilized for the production of political announcements or programs, subject to available production time. Rates are available on request. Production charges are handled separately from time charges. Agencies and/or candidates who schedule production time at WDEF are required to provide a check for payment of accrued charges following the final production session. No spots will air, nor will any dubs be ordered, until a check is received for the correct amount. WDEF news talent is not available for political advertising purposes (on-camera or voice over).

WEEKEND ACCESS

WDEF will permit federal candidates to place time orders and change or edit copy outside of regular business hours on the weekend before the primary or general election. Daily time restrictions apply. Please contact WDEF for additional information.

January 19, 2021

AVAILABILITIES

Legally qualified candidates may purchase time from WDEF subject to availabilities.

- a. WDEF offers spots to commercial advertisers in the following increments: :10's, :15's, :30's, and :60's. The standard length of time sold by the station is 30 seconds. Spots of alternative lengths typically are limited and subject to greater pre-emptibility based on time period; approximately 5% of WDEF inventory allows for natural :10's and/or :15's. Ten (:10) second announcements are calculated at 50% of the :30 second rate; Fifteen (:15) second announcements are calculated at 65% of the :30 second rate; Sixty (:60) second announcements are calculated at double (200%) the :30 second rate. All calculations for announcements other than :30's will be rounded to the nearest \$5 increment.
- b. Candidates should be aware that orders for the purchase of time made after 12:00 noon on the Thursday proceeding the upcoming week may not be available due to a lack of inventory. WDEF is sensitive to the special needs of political candidates and makes every effort to accommodate them. Candidates purchasing time at the rates shown on WDEF's rate card will receive as much preemption protection as any advertiser purchasing time of the same class and amount of time in the same period. However, the earlier an order is placed, the greater the scheduling options will be.
- c. WDEF will place all orders as to day and time, subject to availabilities.
- d. Requests for paid programming avails or spots in non-standard increments will be considered on an individual basis. No promotional announcements will be scheduled to promote political programs.

RATES

In adherence with the Communications Act, during the 45 days prior to a primary election and the 60 days prior to a general election, WDEF will offer every class of time at the lowest unit rate to legally qualified political candidates for candidate-authorized "uses." If neither the candidate's voice nor picture appears in an ad, it is not a "use" and, therefore, does not qualify for WDEF's lowest unit rate. WDEF will adjust rates in accordance with ordinary business practices, and lowest unit rates for preemptible spots may change on a weekly basis, in keeping with our standard practice. During periods of high demand, clearance probability may change and increases in preemptions may occur; rates may be increased. WDEF will adjust its rates on a regular basis to remain current with market conditions.

A candidate for federal office is eligible for WDEF's lowest unit rate only if the candidate provides "written certification" that the spot will not make any direct reference to another candidate for the same office unless the spot complies with enhanced Bipartisan Campaign Reform Act disclosure requirements. To satisfy the enhanced disclosure requirements, the end of the spot must include a clearly identifiable photographic or similar image of the candidate and a clearly readable printed statement that identifies the candidate and states that the candidate has approved the spot and that the candidate's authorized committee paid for the spot. It is the candidate's responsibility to meet these requirements. If a candidate's spot fails to comply with enhanced disclosure requirements, that candidate will no longer be entitled to receive WDEF's lowest unit rate for the remainder of the relevant election window.

WDEF defines its classes of time as follows:

Non-Preemptible - Spots scheduled to air at WDEF's discretion within or adjacent to the particular program, time period, daypart, or day as specified by the advertiser. These spots may not be preempted in favor of any other advertisement and will air as scheduled absent unforeseen changes or technical difficulties. Because WDEF has a limited number of commercial availabilities in each program, even "non-preemptible" time may be sold out and not available to any additional advertisers at any price, in keeping with our normal policies. In this case, WDEF will endeavor to locate a comparable area for placement of a candidate's time.

Preemptible Level 2 - Spots scheduled to air at WDEF's discretion within or adjacent to the particular program, time period, daypart, or day as specified by the advertiser. These spots may be preempted in favor of non-preemptible advertisements. WDEF believes, in its best good faith assessment, that advertisements purchased at this rate level have a 80% or better chance of airing. These spots must be purchased *more than* 24 hours before they are to air. Make goods will be offered for preempted spots of this class if time allows prior to the election.

Preemptible Level 3 - Spots scheduled to air at WDEF's discretion within or adjacent to the particular program, time period, daypart, or day as specified by the advertiser. These spots may be preempted in favor of a higher class of time. WDEF believes, in its best good faith assessment, that advertisements purchased at this rate level have a 40% or better chance of airing. These spots must be purchased *more than* 24 hours before they are to air. Make goods will be offered for preempted spots of this class if time allows prior to the election.

Immediately Preemptible - Spots scheduled to air at WDEF's discretion within or adjacent to the particular program, time period, daypart, or day as specified by the advertiser. WDEF believes, in its best good faith assessment, that advertisements purchased at this rate level have less than 40% chance of airing. These spots must be purchased *more than* 24 hours before they are to air. Make goods will be offered for preempted spots of this class if time allows prior to the election.

Other Classes – WDEF broad rotators and Direct Response, which offer a product or service, are scheduled to air at WDEF's discretion within wide rotations as negotiated with the advertiser. These announcements are immediately preemptible with no notice. Make goods are not available. These rates are not subject to lowest unit rate considerations and available by request only at WDEF's discretion.

WDEF sometimes sells time on the basis of ratings and demographic delivery targets specified and agreed to by WDEF and the advertiser at the time a contract is entered into. Although WDEF does not guarantee that time sold will deliver the specified ratings and demographic targets, it cooperates with advertisers in conducting post-broadcast analyses of their schedules and, in cases of substantial under-delivery, may work with the advertiser to make up a portion of the under-delivery. If political candidates are interested in discussing an audience guarantee, it is recommended that they contact the station directly.

REBATES

In the event advertising time is sold for a particular class and for a particular time period, and is broadcast at rates lower than the rate paid by the candidate for the same amount of time in the same class and time period, before rates are changed

in the normal course, the candidate will be afforded the benefit of the lower rate, to the extent required by federal law. WDEF will provide the candidate with either a rebate or as a credit against future purchases, at the candidate's option.

MAKE-GOODS

WDEF will make its best effort to provide "make-good" spots prior to the election for candidate authorized "uses" spots that are preempted due to technical problems or because of the nature of the time purchased. Although WDEF's policy is to offer all candidates make-goods before the election, we cannot guarantee to any advertiser that the make-goods can be provided in the specific program, time period, or rotation originally ordered. If inventory constraints preclude such identical scheduling, WDEF will offer make-goods of equivalent value. If these are not acceptable to the advertiser, WDEF will provide credits or refunds for preempted spots.

PACKAGES

Combinations of classes are available. The rate for each ad in a package, however, will be offered at the lowest unit charge for the class of time ordered. The lowest unit charge for spots in each class of time in each time period offered by WDEF reflects package discounts. Please contact the station for more information.

PLACEMENT

WDEF will endeavor to give protection within a break for spots for candidates for the same political office; however, there are no guarantees and credits or make-goods will not be given in the event that opposing candidates advertisements run consecutively in the same commercial break. This is consistent with our policy for commercial advertisers.

PUBLIC FILE

WDEF public file is available for inspection on-line.

CONTACTS

3300 Broad Street
Chattanooga, TN 37408
General Sales Manager, Tommy Youngblood – 423-785-1208
National Sales Coordinator, Kailee Doyle – 423-779-6198
Traffic Manager, Amy Fleming – 423-785-1204
WDEF Switchboard – 423-785-1200

*WDEF adheres to all political rules and regulations
as dictated by the Federal Communications Commission.*