

**POLITICAL ADVERTISING GUIDELINES FOR**  
**ESTRELLA MEDIA, INC. TELEVISION STATIONS**

KRCA (LOS ANGELES), KZJL (HOUSTON), KMPX (DALLAS), WGEN (MIAMI), WASA (NY), WESV (CHICAGO), KVPA (PHOENIX), KETD (DENVER), KSDX (SAN DIEGO)

Effective as of: January 1, 2020

**1. Applicability**

This policy describes the political advertising policies of Estrella Media, Inc. for its owned and operated stations (which presently include KRCA, KZJL, KMPX, WGEN, WASA, WESV, KVPA, KETD, and KSDX, collectively “Stations”), adopted in compliance with the requirements, rules, and regulations of the Federal Communications Commission. These policies apply to purchases of advertising time for “uses” by legally-qualified candidates for public office (i.e., spots that feature the candidate’s recognizable voice or likeness and are controlled, sponsored, or approved by the candidate or the candidate’s authorized committee). These policies do not apply to third-party ads, such as those purchased by political action committees, political parties, or issue advertisers.

**2. Access**

Reasonable access will be provided to all Federal candidates. The Stations may, but are not required to, sell time to legally-qualified candidates in certain state and local races. In order to comply with its equal opportunities obligations, the Stations reserve the right to limit the amount of time made available for candidates for state or local races. The Station does not separate competitive political advertisements. Thus, a candidate’s spots may be aired “back-to-back” with their opponent’s spots.

**3. Classes of Time**

The Stations offer the following classes of time. All rates quoted are for 30-second spots.

**Class 1 – 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.

**Class 2 – Preemptible with 24-hour notice.** These spots can be preempted by Class 1 spots or by spots purchased at a higher rate within the same class of time with 24-hour notice to the purchaser. Once the notice deadline has passed, spots of this class will air, subject to unforeseen program changes or technical difficulties.

**Class 3 – Preemptible without notice.** These spots can be preempted by Class 1 or Class 2 spots or by spots purchased at a higher rate within the same class of time with no notice to the purchaser.

**Special Programs.** Special program spots (e.g., sporting events, annual entertainment events) may be available. Rates for these spots are available upon request.

#### **4. Lowest Unit Rate**

The lowest unit charge is the lowest rate paid for the same class, time-period, and amount of time that clears. Each Station will provide its lowest unit rate to legally qualified candidates and their authorized committees for candidate-authorized uses in the pre-election period 45 days before a primary election and 60 days before a general or special election. Outside of the 45-day and 60-day periods before primary and general elections, the Stations will sell time to candidates at the current effective selling rate for comparable commercial advertisers.

Current estimates of the lowest unit charge and probability of preemption are included on the attached rate card. Because we cannot determine lowest unit charge until all time has aired in a particular week and because the rate levels at which time will clear vary with market demand, the Stations cannot guarantee estimates of the lowest unit charge or of the preemption likelihood of a particular class of time. All such estimates are subject to the demand and supply of current market conditions.

#### **5. Rebates**

If a lower priced spot clears in the same class and time-period, the Stations will rebate the difference to the candidate. The Stations review their records on a weekly basis. Candidates will be given the option of receiving a credit toward future purchases or receiving a rebate.

#### **6. Sponsorship ID**

All political advertisements must contain sponsorship identification that complies with Section 73.1212 of the FCC's rules and with applicable federal and state election laws. Such sponsorship ID must fully and accurately identify the organization or individual that has paid for the spot using the terms "paid for by" or "sponsored by."

Section 73.1212 requires political spots to contain visual sponsorship identification in letters not less than four percent (4%) of total picture height broadcast for not less than four (4) seconds. The Stations will add the required sponsorship identification to any spots not containing it and will charge candidates for production costs in doing so on the same basis as would be applicable to commercial advertisers. **THE STATIONS WILL NOT ADD TIME TO THE LENGTH OF A SPOT TO ACCOMMODATE SPONSORSHIP IDENTIFICATION.**

Additionally, advertisements for federal candidates must also include a statement that identifies the candidate and states that he or she approved the communication. The candidate must convey the statement either through an unobscured full-screen view while identifying themselves and making the required statement, or by including a voice-over in which the candidate identifies himself and makes the required statement while a clearly identifiable photographic or similar image – which must occupy at least 80% of the vertical screen height – appears on screen. If the spot makes a direct reference to another candidate for the same office, then the end of the spot

must include a similar statement in writing. The written statement must appear in letters no smaller than four percent (4%) of the vertical picture height and must remain on screen for a period of at least four (4) seconds. The written statement should also state the name of the person or entity that sponsored or paid for the spot.

## **7. Sponsorship ID and Lowest Unit Charge for Federal Candidates**

In compliance with Bipartisan Campaign Reform Act of 2002 (“BCRA”), a federal candidate is only eligible to receive the Stations’ lowest unit rate if the candidate or the candidate’s authorized committee certifies to the Stations that the proposed political advertisement will not make a direct reference to an opponent candidate unless the spot complies with the enhanced disclosure requirements of BCRA. The enhanced BCRA disclosure requirement requires that the spot contain a clearly identifiable photo or image of the candidate, and a clearly readable statement that identifies the candidate, states that he or she approved the broadcast, and that his or her authorized committee paid for the spot. If a federal candidate does not provide the required certification or does not comply with the enhanced disclosure requirements, he or she is not entitled to receive the Stations’ lowest unit rate for the remainder of the time leading up to the election for that office.

## **8. Agency Commission.**

The Station provides a 15 percent discount for ad buys made by an advertising agency. Political candidates and authorized campaign committees who purchase time without an advertising agency will receive a 15 percent discount.

## **9. Placing an Order.**

Orders for time will not be considered firm, until the Station has received the following:

- A complete, accurate, and signed NAB PB-18 Form (or all information required by this form);
- Proof that a candidate is legally qualified;
- Proof that a purchaser is a candidate’s authorized committee; and
- Advance payment for ordered time.

## **10. Traffic Instructions, Format, Deadlines.**

All traffic instructions, and any changes, must be received in writing. The Stations will accept spots delivered by XDCam disc or digital hard drive. The preferred format is Avid DNxHD 145 (8-bit) 720p 59.94 48 kHz, aspect ratio 16:9, chroma 4:2:2, video bit rate 45 Mbps. For digital files, H.264/H.265 is required. In order to ensure sufficient time to conduct pre-broadcast review of spots, candidates must submit spots a minimum of 48 hours in advance. Spots submitted in any other media, files, or formats may be rejected or may require additional time (i.e., more than 48 hours) to review or reformat prior to airing.

### **11. Station Access/Production.**

The Stations may permit federal candidates (but not state and local candidates) to change and edit copy outside of regular business hours on the weekend before the election. Contact the Station for more specifics.

The Stations may make production facilities available for political advertisements and programs. Production charges are handled separately from time charges. Contact your account executive for information and rates.

### **12. Election Day Schedules.**

The Station will air political ads on Election Day until 8:00 p.m. PT/MT/CT/ET. All requests for Election Day availabilities must be received by close of business on the Tuesday prior to the election.

### **13. Public File.**

The Station maintains an online political file. Information in this file can be found at <https://publicfiles.fcc.gov/>.

### **14. Non-Discrimination.**

Stations licensed to Estrella Media, Inc. do not discriminate in the sale of advertising time and will accept no advertising that is placed with intent to discriminate on the basis of race or ethnicity. The parties to an agreement for the sale of advertising time on a Station licensed to Estrella Media, Inc. affirm that nothing in that agreement will discriminate in any way on the basis of race or ethnicity.