

ION Media Networks | Political Candidate Advertising Policy & Guidelines

The following is provided as a guide to the policies and practices of the ION Media Networks and The E.W. Scripps Company regarding the sale of advertising to political candidates.

Should you require further clarification or assistance with any of these practices or policies, please contact:

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Pricing for Candidate “Use”

Candidate “uses” are ads that include a positive appearance, by voice or picture, of a legally qualified political candidate. During the 45 days preceding a primary election, and during the 60 days preceding a general or special election, only candidates enjoy the benefit of being able to purchase time for such “uses” at the lowest unit charge (LUC) offered any commercial advertiser for an ad of the same class, of the same length, and for the same time period. The current lowest unit charge prices for the various classes of spots offered by the station are attached.

Prices for commercial advertisers’ spots are developed through negotiation and vary based upon demand and the level of preemption protection sought by the advertiser. Candidates likewise may negotiate to purchase spots at any rate available to commercial advertisers, but the ultimate charge for any candidate “use” will not exceed the lowest price paid by any other advertiser 1.) for the same class of time, 2.) of the same length and 3.) for the same dates, which actually runs during the appropriate advertising window. In the event that the price initially paid by a candidate should exceed the price paid by another advertiser for a spot meeting these three conditions, a makegood or a rebate of the difference will be promptly provided.

Lowest unit charge prices are established on a weekly basis. This rate guide will be updated on a weekly basis. Please check the effective date to ensure that the most current information has been provided. All sales are made subject to confirmation of availability.

Classes of Spot Time Available

All classes of time and discount privileges available to commercial advertisers are listed below and are available to qualified political candidates:

Non-Preemptible Candidate Only

- Scheduled to air at the station’s discretion in the particular program, time period, daypart or day specified by the advertiser
- Will not be preempted in favor of any other spot
- Will air as scheduled absent unforeseen program changes or technical difficulties

Immediately Preemptible

- Scheduled to air at the station’s discretion in the particular program, time period, daypart or day specified by the advertiser
- Spots are immediately preemptible

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- The likelihood of such spots being preempted is difficult to predict, but the risk of preemption is always substantial and, depending on market condition, may be very high
- The station will give its best good faith estimate of the likelihood of preemption at the time of the particular request.

In addition to the classes of time described above that are routinely offered to commercial advertisers, the station on occasion offers:

- "ROS" spots that are offered in daily or weekly rotations across multiple programs and scheduled only as inventory permits. These are the first spots to be preempted, and makegoods are not offered for such spots on a time-sensitive basis.
- "Fixed" spots that are non-preemptible and scheduled to air in a particular program at a specific time or break and will air as scheduled absent unforeseen program changes or technical difficulties.

Further, the station from time to time may participate in an "unwired network" whereby the station will air spots sold by a national sales representative who has offered advertisers broad geographic coverage at special multi-station rates.

Audience Guarantee agreements are based on previously agreed upon terms and conditions.

Candidates interested in discussing the availability of any of these type offerings should contact the station, rates and conditions will be made available upon request.

Reasonable Access

All Federal Candidates will receive access to the station's programming for the purchase of "reasonable amounts" of advertising time. The station reserves the right to accept or deny all state, local or 3rd party political advertising, and/or limit the amount of inventory made available to these categories. Access to the station's commercial airtime for any of these candidates or parties will be made on a per race basis.

Rates

All rates quoted on the attached rate card are for (:30) thirty-second commercial announcements.

- Sixty-second (:60) announcements are double the :30-second rate
- Fifteen-second (:15) commercial announcements are 50% of 30-second rate rounded up to the next highest five-dollar increment.
- Ten-second (:10) commercial announcements are 50% of 30-second rate rounded up to the next highest five-dollar increment.

The station reserves the right to revise (increase/decrease) the rates charged during the election period as they relate to ordinary business practice.

Please be advised that 10-second spots and 15-second spots are considered separate classes of preemptible time and are **highly preemptible** in time periods which do not contain fixed :10 or 15-second positions;

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therefore, the station does not offer non-preemptible class status to any announcement less than 30 seconds in duration outside of these natural positions. Please contact station for further information.

Program length commercials will be sold subject to availability. Available time periods will be provided upon request.

Direct response commercial time is available, is highly preemptible and has no guarantee of running at all. Qualifying unit lengths (:30's :60's :90's and :120's) with respective rates will be provided upon request. Advertiser must meet the criteria of a "Direct Response" client (available upon request). No makegoods are offered to spots preempted from Direct Response schedules.

Political Sponsorship Identification

In order to give clarification as to what constitutes adequate sponsor identification for all political advertising (both spot and program), the station has adopted the following requirements for all political advertising as set forth in various Federal Communication Commission rulings.

- It is required that the name of the organization purchasing the airtime be clearly identified and preceded by the words: "Paid For By . . ." or "Sponsored By . . ." or "Furnished by..."
- Example - "Paid for by the John Doe for Congress Committee", or, "Sponsored by the John Doe for Congress Committee"
- No abbreviations are allowed and full committee name must appear
- These disclosures must be both aural and visual OR visual only so long as the height of the letters are at least 20 scan lines and visible for at least a 4-second duration. This FCC requirement is based on the need for sponsor identification to be clearly and quickly understandable to the general viewing public. In this respect, either disclosure method chosen must have the visual portion contain large enough print and be shown for a long enough period of time to be readable. The aural disclosure, incorporated, should be distinctly spoken.
- Please note that a P.O. Box is not a legal residence or business address and is not accepted as the address of a party, candidate or campaign headquarters.
- Adequate sponsor identification shall be made at both the beginning and end of all political programs which exceed 5 minutes duration. Programs of five minutes or less duration need only contain one sponsor identification disclosure and this may appear at the beginning or the conclusion of the program.
- Third party candidate support groups are those groups or persons who are neither the Candidate nor are the Official Committee or Agent of the Candidate. As defined, such third party groups are not guaranteed access to station time, nor is the station obligated to offer a lowest unit rate. Further, regardless of the spots being for a Federal or State office candidate, a full disclaimer is required as outlined in the four bullet points at the top of this section with the exception that all such spots must state whether the spot IS or IS NOT authorized by the candidate or the candidate's official committee.

Standards for Political Sales Practices

Makegoods

The station will use its best efforts, and negotiate in good faith, to provide "makegood" spots prior to the election for any immediately preemptible candidate "use" spots that are preempted. Although the station's policy is to offer all candidates makegoods before the election, we cannot guarantee to any advertiser that the makegoods can be provided in the program time period or rotation originally ordered. If inventory constraints

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preclude such identical scheduling, we will offer makegoods of equivalent value. If these are not acceptable to the advertiser, the station will provide credits or refunds for preempted spots.

Ad Creative & Production Services

Payment for other creative services (i.e. production, dubs, etc.) is required prior to services rendered. Production rates are available upon request. The availability of creative production facilities is not guaranteed. It is therefore suggested that requests for production time be booked in advance.

Signed Documents

All pertinent paperwork (orders, completed political agreement forms, etc.) and documents that require candidate or candidate agent signature must be signed and delivered to the station no later than the close of business on the working day prior to the first potential air date. Political record of request form for avails should be completed and forwarded to the station for placement in the political file.

Advance Payment Policy

The station requires that payment for political spots be made prior to the start of the schedule. Payment should be made in the form of cash, wire transfer, credit card, cashiers' check, certified check.

Please send payment to: EWS Political Sales
 Attn: Samantha Osborne
 1100 13th Street NW
 Suite 400
 Washington, DC 20005
 202-408-2758

Log Guidelines

TV logs close at 12pm (Noon) on the normal business day prior to actual air date (i.e., Tuesday's log closes at 12pm on Monday). The exception relates to weekend log schedules and holidays. Holiday log schedules are available upon request. Weekend deadlines are as follows:

DAY	LOG CLOSES
Friday	12:00pm Thursday
Saturday	1:00pm Thursday
Sunday	12:00pm Friday
Monday	1:00pm Friday

Political File

The station maintains a current political file in compliance with regulations established by the Federal Communications Commission. The file is available for inspection at <https://stations.fcc.gov>.

Rebates

If at any time an error has been made and a lower rate is warranted, the agency/client will be contacted immediately. The overcharge amount either will be returned to agency/client or added to schedule to purchase additional spots per agency/client directive.

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Programming

The station will provide reasonable access to its facilities for all legally qualified federal candidates. Candidates are invited to make specific program requests, but the station reserves the right to make the final determination with respect to the amount of time offered and the placement of any candidate advertising. All stated programs are subject to change without notice.

The station reserves the right to schedule competitive political advertisers back-to-back if necessary.

Advertising on Election Day

Political announcements can air up to 5pm on Election Day.

Cancellation Policy

Schedule may be canceled with 2 weeks prior notice.

Election Dates

State Primary Election Date – TBD

State General Election Date – TBD