



## Charlottesville Radio Group STATEMENT OF POLICY ON POLITICAL ADVERTISING

It is the intention of Charlottesville Radio Group heretofore identified as "CRG" to comply fully with all applicable laws and regulations relating to the use of 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, CRG 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 CRG by permitting the purchase of reasonable amounts of time for their use on CRG. While CRG 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 CRG has offered to commercial advertisers during the year preceding the relevant pre-election period, as well as any length of time that the station has programmed in the year preceding the election. CRG 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.

CRG 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 CRG, and potential programming disruption.

**STATE AND LOCAL RACES.** It is the policy of CRG to keep its listeners informed of opposing candidates' viewpoints in state and local elections. Generally, CRG also sells airtime to legally qualified candidates for non-federal public office. However, CRG reserves discretion 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 CRG's obligation to afford reasonable access to federal candidates, the availability of inventory, and potential programming disruption. CRG 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 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 CRG by legally qualified candidates running in that election are not, under federal law, permitted to exceed the lowest unit charge of CRG 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 CRG 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 a post-order change in the applicable lowest unit charge or for any other reason, CRG 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 CRG by legally qualified candidates may not exceed the charges made for comparable use of CRG 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 “use,” unless the candidate authorizes the advertisement. 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, CRG’s lowest unit charge is based on the net to CRG. Thus, for example, if CRG’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, CRG will net \$85 from the sale of that spot (\$100 less the normal 15% agency commission). CRG’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 CRG’s advertisers may make:

**Length of Announcements.** Generally, CRG makes available for purchase airtime in the following lengths: 60 seconds, 30 seconds and 10 seconds. Our rates are unit based ie; the same whether the client purchases a :30 or :60 avail. A 10 second "billboard" is deemed too short to permit the required sponsor identification and therefore unavailable for political advertising. As stated above, CRG will make other lengths of time available to candidates for federal office if CRG has offered such lengths to commercial advertisers during the year preceding the relevant pre-election period, or if CRG has aired programs of such lengths in the year preceding the election.

## TYPES OF ADVERTISING SCHEDULES (continued).

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

**Grid 1 Fixed (non-pre-emptible):** 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. Fixed spots constitute CRG's highest-priced class of time.

**Grid 2 Effective Selling Level (pre-emptible with notice):** Spots of this level are generally pre-empted only to run fixed spots purchased by another advertiser. The likelihood of clearance of this level of pre-emptible spot, therefore, is relatively high except in high demand dayparts and programs with few locally available commercials.

**Grid 3 Immediately Pre-emptible (pre-emptible without notice):** Spots of this level are the lowest program/day part rate accepted by the station and are immediately pre-emptible to run Effective Selling Level spots or fixed spots. Thus, the likelihood of clearance of Immediately Pre-emptible Level 3 spots is the lowest of all available classes of time.

For "pre-emptible" classes, candidates may purchase ads at the lowest unit charge or at a higher rate so as to decrease the potential for pre-emption. In the event that a candidate purchases a pre-emptible 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 pre-emptible 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.

**Current rate information** for all of the lengths/classes of time offered by CRG is provided to each person who requests information regarding political advertising on CRG.

**Make Goods:** It is the policy of CRG to offer all political candidates "make goods" prior to the election, for candidate "use" spots that are pre-empted if CRG has offered time-sensitive make goods for the same class of time to any commercial advertiser within the past year. CRG cannot guarantee, however, that the time-sensitive make goods can be provided in the time period originally ordered. If inventory constraints make identical scheduling impossible, CRG will offer make goods of equivalent value or provide credits/refunds for pre-empted spots.

**Election Day:** CRG does accept political advertising on Election Day.

**PREREQUISITES TO BROADCAST.** For each political time order, an NAB political broadcast form must be at CRG prior to broadcast. Copies of the current NAB form are available upon request. CD or mp3 recordings must be at CRG in advance of their first scheduled airing, or no later than 11 am on Friday for weekend airing. However, we will do our best to accommodate federal candidate's 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 whose behalf payment is made. If an outside party is involved, the identification must state whether a candidate or his/her committee authorized the announcement. *An audio identification of at least four (4) seconds in duration is required. 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 purchased, spots lacking the required identification may be partially overdubbed.*

**STAND BY YOUR AD PROVISION.** In order to qualify for Lowest Unit Charge rates, Federal candidates must provide CRG with a written certification stating that they will not make a direct reference to another candidate for office without an enhanced sponsorship identification announcement. *This identification must include an audio identification of at least four (4) seconds in duration clearly identifying the sponsoring candidate. This audio identification must state that the candidate has approved the ad and that the candidate's campaign committee has paid for the ad.*

**PREPAYMENT AND CREDIT.** All political orders, whether direct from the candidate or through a recognized advertising agency, must be paid in full at least (24) hours prior to the first scheduled broadcast of the flight. 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.** CRG will make its production facilities available to candidates and their representatives. All inquiries or requests concerning production time and facilities should be made through station political advertising or production representative (see contacts list below).

**POLITICAL FILE.** We maintain a political file of all requests for broadcast time made by or on behalf of candidates for public office, together with materials showing the disposition made by CRG of each such request, any charges made if the request was granted, and the lengths, classes, and dayparts purchased. **CRG will upload political advertisers' NAB forms and related broadcast contracts to the public file at COB on the business day immediately preceding the date ad(s) are scheduled to begin airing.** The political file is available for public inspection online and during regular business hours at CRG'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.

**LIST OF OFFICERS AND DIRECTORS REQUIRED.** CRG requires a committee, association, or group that is purchasing political advertising to furnish CRG 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 CRG will grant a request for time. These lists will be available for public inspection at CRG's main studio during regular business hours. These records will be retained in the political file for two years.

**PLACING ORDERS/PRODUCTION.** The following persons are available to assist candidates with their radio advertising on CRG:

Garrett Klingel	VP/GM	Political Advertising
Sharon Sant	Senior Account Rep	Political Advertising
Teresa Plunkett	Traffic Manager	Traffic/Fulfillment
Teresa Plunkett	Production/Continuity	Studio Time/Production

**Saga Communications, Inc., through its subsidiary, Charlottesville Radio Group and Station(s) WINAamfm/WVAXamfm/WQMZ/WCNR/WW/WCVL, prohibit all forms of discrimination in advertising contracts. We do not and shall not discriminate on the basis of race or gender regarding advertising practices.**