

WNOR/WAFX
STATEMENT OF POLICY ON POLITICAL ADVERTISING
2022

It is the intention of WNOR/WAFX/WJOI 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, WNOR/WAFX/WJOI 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. The following is always subject to change.

CANDIDATES FOR FEDERAL OFFICE. We afford legally qualified candidates for federal elective office reasonable access to WNOR/WAFX/WJOI by permitting the purchase of reasonable amounts of time for their use on WNOR/WAFX/WJOI. While WNOR/WAFX/WJOI do not offer free time for political advertising, they make 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 WNOR/WAFX/WJOI 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. WNOR/WAFX/WJOI 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.

WNOR/WAFX/WJOI intend 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 WNOR/WAFX/WJOI, and potential programming disruption.

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

WNOR/WAFX/WJOI 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 WNOP/WAFX/WJOI 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, WNOP/WAFX/WJOI will rebate the excess payment to the candidate, or credit that amount toward a further time purchase should the candidate so desire.

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, WNOP/WAFX/WJOI lowest unit charge is based on the net to WNOP/WAFX/WJOI. Thus, for example, if WNOP/WAFX/WJOI 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, WNOP/WAFX/WJOI will net \$85 from the sale of that spot (\$100 less the normal 15% agency commission). WNOP/WAFX/WJOI 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 WNOP/WAFX/WJOI advertisers may make:

Length of Announcements. Generally, WNOP/WAFX/WJOI makes airtime available for purchase in the following lengths: 60 seconds, 30 seconds, 15 seconds.

Classes of Time: Generally, WNOP/WAFX/WJOI make available the following classes of time to qualifying political candidates. Committee and issue advertising does not qualify for the classes of time listed below.

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 WNOP’s highest classes 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 time periods of high demand and few available commercials.

Grid 3 Immediately Pre-emptible (pre-emptible without notice): Spots of this level are the lowest day part rates 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 Grid 3 spots is the lowest of all available classes of time.

For “pre-emptible” classes, candidates may purchase ads at the lowest unit charge for any class of time. They may purchase a more expensive class of time 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 of time 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 and classes of time offered by WNOR/WAFX/WJOI are provided to each person who requests information regarding political advertising on WNOR/WAFX/WJOI and that provide stations with documentation of their legally qualified candidate status.

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

PREREQUISITES TO BROADCAST. For each political time order, an NAB political broadcast form must be at WNOR/WAFX/WJOI or WNOR/WAFX/WJOI representative’s office prior to broadcast. Copies of the current NAB form are available upon request. Tapes must be at WNOR/WAFX/WJOI in advance of their first scheduled airing, or, no later than 12:00pm on Friday for weekend airing. However, we will do our best to accommodate federal candidate 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 upon 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. A video identification of at least four (4) seconds in duration with letters equal to or greater than four (4) percent of the vertical picture height 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. If WNOR/WAFX/WJOI is required to perform such production, normal production charges will be assessed.*

PREPAYMENT AND CREDIT. All political orders, whether direct from the candidate or through a recognized advertising agency, are subject to normal WNOR/WAFX/WJOI credit policies. Candidates who wish to apply for credit should allow ample time for processing of the credit application. Unless credit is extended, advance payments must be made 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. WNOR/WAFX/WJOI 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 WNOR/WAFX/WJOI's 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, together with materials showing the disposition made by WNOR/WAFX/WJOI 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 WNOR/WAFX/WJOI main studio or on our web site. 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. WNOR/WAFX/WJOI require a committee, association, or group that is purchasing political advertising to furnish WNOR/WAFX/WJOI 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 WNOR/WAFX/WJOI will grant a request for time. These lists will be available for public inspection at WNOR/WAFX/WJOI main studio during regular business hours. These records will be retained in the political file for two years.

