

STATEMENT OF POLICY ON POLITICAL ADVERTISING FOR ELECTION YEAR 2021

This Statement of Policy on Political Advertising describes the policies of each station for which you have sought information (the “Station”), regarding advertising purchases by legally qualified candidates for public office and their authorized campaign committees. This policy applies to “uses” of the Station by such candidates, as that term is defined by the Federal Communications Commission, and not to sale of time to other entities, including political issue advertisers. To the extent permitted by law, the Station reserves the right to modify this Statement at any time. It is provided for general information and is not a part of any advertising contract.

It is the Station’s policy to comply fully with all applicable laws and regulations relating to political broadcasting.

CANDIDATE ACCESS TO STATION FACILITIES. We afford legally qualified candidates for federal elective office reasonable access to the Station by permitting the purchase of reasonable amounts of time for the candidate's “use” of the Station (i.e., a positive spot in which the candidate’s voice or picture appears). The Station also offers time for sale to legally qualified candidates for certain state and local elective offices. The Station will determine the extent to which it will sell advertising for particular state and local races on a case-by-case basis, consistent with the Station’s legal obligations.

RATES FOR CANDIDATES. During the 45-day period preceding a primary or primary run-off election and during the 60-day period preceding a general or special election, the Station will charge its lowest unit rate for “uses” of the Station by legally qualified candidates for a particular class of spot, length of spot and time period. Whether a candidate is entitled to the lowest unit rate for a particular spot depends on the date the spot airs -- not when the order is placed or accepted.

In addition, a federal candidate is eligible to receive the Station’s lowest unit rate only if the candidate provides a written certification that the spot will not make direct reference to another candidate for the same office unless the spot complies with the enhanced disclosure requirements imposed by the Bipartisan Campaign Reform Act (“BCRA”) and the candidate abides by the terms of this certification. To satisfy these requirements, the end of the spot must contain both 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. If a federal candidate has either not provided the required certification or does not comply with its terms, he or she is not entitled to receive the Station’s lowest unit rate for the remainder of the time leading up to the election for that office.

The lowest unit rate for a particular length of spot, class of spot and time period may vary during the 45-day and 60-day pre-election periods, and the Station will inform candidates of its estimate of the applicable lowest unit rate when requests for availabilities are received.

Outside of the pre-election 45- and 60-day periods, charges for political advertising by legally qualified candidates will not exceed charges for comparable uses of the Station by other commercial advertisers.

TYPES OF ADVERTISING SCHEDULES. The Station differentiates between the advertising time it sells based on the following general characteristics:

- **Length of Announcements:** Generally, the Station makes available for purchase the following lengths of air time: 60 seconds, 30 seconds, 15 seconds, and 10 seconds. Federal candidates may purchase any standard length of time that the Station has offered to commercial advertisers during the year preceding the election. The Station will also consider, on a case-by-case basis, requests by federal candidates for non-standard lengths of time whether or not sold or programmed commercially by the Station during the previous year.
- **Classes of Time:** The Station makes available for purchase the following classes of time, which is on a lowest unit rate basis in the pre-election periods:
 - **Non-Preemptible.** The Station offers non-preemptible time to advertisers. These spots are not preemptible by other spots, even if a higher price is paid by other advertisers.
 - **Candidate-Only Preemptible.** The Station offers candidates a special class of time with preemption priority over all other preemptible time, but not over non-preemptible time. This class of time will be offered at a rate not less than 5% below the current effective selling level for preemptible time sold to commercial advertisers.
 - **Preemptible.** A preemptible spot runs the risk of being preempted by another spot for which a higher rate is specified in the purchase order. Spots in this class also may be preempted by any spot purchased in a higher class (Candidate-Only Preemptible or Non-Preemptible), regardless of the rate paid for the preemptible spot. A candidate's advertising will be preempted only by advertisements in a higher class of preemptible advertisements, based on the classes the Station adopts.. Spots in the preemptible class may be preempted by candidate-only preemptible and non-preemptible advertisements regardless of the rate paid for the preemptible advertisement.

All spots, including non-preemptible spots, may be preempted at the Station's discretion in order to cover a breaking news event, to broadcast programming deemed of overriding public importance, due to transmission or other technical problems, or in other similar circumstances.

Candidates should note that the likelihood that a particular spot will be preempted fluctuates regularly based on the amount of available inventory

and other factors. The Station will provide a good faith estimate of the likelihood that an advertisement ordered in a particular time period and class will clear, but the Station emphasizes that it can provide only an estimate of the likelihood of preemption, not a guarantee, and that it will not undertake to update voluntarily preemption estimates if circumstances change after they are given.

- **Time Periods:** The most common time periods for which the Station sells advertisements (programs and rotations) are listed on the Station's rate card. From time to time, we may sell advertising in other time periods. In addition, the Station offers advertisers various "weekly rotators," by which advertisers may purchase a certain number of spots per week, to be aired at any time within a particular part of the day during the week. Please contact the Station for more information on other time periods and rotators.

SPECIFIC SALES PRACTICES. The Station occasionally sells time to some advertisers on other bases, such as run of schedule spots, or subject to certain guarantees or benefits, which may be requested by political advertisers. Those guarantees and benefits are described below:

- **Make Goods.** If a candidate spot of any class is preempted or fails to run as scheduled for technical or similar reasons, the Station will endeavor to offer the candidates a "make good" to be broadcast prior to the election. Make-goods will consist of one or more spots with an aggregate value comparable to that of the preempted spot. The Station will first seek to provide a make good for the same class of time, but, in many cases, the offered make-goods will consist of a combination of spots in time periods other than that originally ordered. If a candidate rejects the offered make-goods, the Station will provide credits or refunds for the preempted spots.
- **Package Plans.** From time to time, the Station will offer specialized and/or individually negotiated packages of advertising time to its advertisers. During the statutory "lowest unit charge" periods, legally qualified candidates may purchase such packages from the Station at the lowest rate at which the Station sells such packages to commercial advertisers. In addition, the Station will factor the rate applicable to each spot within a package into its calculation of the lowest unit rate for candidate spots having the same length of time, time period, and class as the package spots.
- **Audience Delivery Guarantees.** From time to time, the Station may sell advertising to its clients with a guarantee that the audience for the programs or day parts in which the spots are aired will meet or achieve a pre-designated level. Legally qualified candidates may negotiate under-delivery protection, which is not available unless it is specifically negotiated for before an order is accepted. To the extent under-delivery protection is part of a contract, the Station may provide the advertiser with make good spots to make up all or part of a shortfall. However, in many cases, the ratings information necessary to determine whether a guaranteed audience level has been

achieved will not be available until after the election. In those cases, the Station will negotiate with candidates on a case-by-case basis to provide comparable benefits.

- **Value Added Features.** Advertisers on the Station sometimes may purchase value-added or promotional elements in conjunction with air time. Legally qualified candidates may purchase value-added elements on the same terms and under the same circumstances as the Station makes them available to commercial advertisers. However, the Station reserves the right to not make available to political candidates any particular value added features that are of nominal value or that could imply a relationship between the Station and the candidate. The Station does not offer sponsored public service announcements to political candidates.

AVAILABILITY. The attached rate card provides the basic periods for which the Station sells time and the Station's currently projected 30 second rates for those periods. The projected rates reflect all volume and other discount privileges available to commercial advertisers on the Station. Additional rate information for different lengths, classes of time, packages, and rotators offered by the Station will be provided to any candidate, or candidate's representative, who requests the information. The customary differences in pricing are that 60 second rates are twice the price of 30 second rates, while 10 second rates are 50% of 30 second rates and 15 second rates are 75% of 30 second rates. All orders are subject to availability at the requested time. The Station will accept political advertising on Election Day and during newscasts, subject to a cut-off at the time local polling stations close.

AGENCY PLACEMENT AND DIRECT PLACEMENT. The rates quoted by the Station on the attached rate card reflect payments of standard agency commissions. Purchases directly from the Station will be at the quoted rates less the 15 percent commission that would otherwise be paid to an agency.

SUBMISSION OF MATERIALS. For each political time order, the Station requests that a candidate provide an NAB political broadcast form (PB-17). Although the Station will use commercially reasonable efforts to clear orders promptly after they are received, candidates should submit orders and broadcast materials no later than one full business day before the advertising is scheduled to air. The Station cannot guarantee its ability to clear advertisements received later than this deadline, particularly in the weeks preceding an election, when demands on staff are particularly intense. Where doubt exists, the Station may require proof satisfactory to the Station that the purchaser is authorized to buy time for the candidate and the candidate is legally qualified.

Where such disclosure is legally required, such as where a committee is purchasing political advertising, the Station requires a list of members of the executive committee or board of directors of any corporation, committee, association, or other group purchasing the time before the Station will grant a request for time. These lists will be available for public inspection at the Station's

main studio during regular business hours and retained in the political file for two years.

Orders placed with the Station will not be confirmed until all of the required materials have been received and payment requirements (described below) have been satisfied.

PREPAYMENT AND CREDIT. All political orders, whether direct from the candidate or through a recognized advertising agency, are subject to the Station's normal credit policies. Candidates who wish to apply for credit should allow ample time processing of the credit application. Unless credit is extended, the Station requires payment in full prior to the scheduled airing of any advertisement. Federal candidates will not be required to pay more than seven (7) days in advance.

SPONSORSHIP IDENTIFICATION. All political advertisements must contain sponsorship identification that complies with the requirements of BCRA and the rules of the Federal Communications Commission and the Federal Election Commission.

All ads must include visual sponsorship identification in letters not less than 4% of total picture height broadcast for not less than four seconds. The Station will add the required sponsorship identification to any spots not containing it and may charge candidates for production costs in doing so on a commercially reasonable basis. *The Station will not add time to any spot to accommodate sponsorship identification.*

In addition to sponsorship identification, the following requirements apply:

- **Elections for Candidates for Federal Office.** Ads authorized by a federal candidate or the candidate's committee must include a statement that identifies the candidate and states that he or she has approved the communication. The federal candidate must convey the statement either through an unobscured, full-screen view of the candidate making the statement or through a voice-over by the candidate, accompanied by a clearly identifiable photographic or similar image of the candidate, which must be at least 80% of the vertical screen height. The end of the spot must include a similar statement in writing. The written statement must appear in letters no smaller than 4% of the vertical picture height and must remain on screen for a period of at least four seconds. The written statement should also state the name of the person or entity that sponsored or paid for the spot.
- **Elections for Candidates for State and Local Office.** Advertisers must include any disclosures required by applicable state laws. For example, to the extent required by law, the advertisement must include a statement that it is a political advertisement.

PRODUCTION FACILITIES. The Station will make its production facilities available to candidates and their representatives. Charges for production facilities are determined separately from charges for air time. All inquiries or requests concerning

production time and facilities should be made through your sales representative or the Station's production department.

POLITICAL FILE. The Station maintains a political file of all requests for broadcast time made by or on behalf of candidates for public office; materials showing the disposition of each request; the rates provided for requests that are granted; and the lengths, classes, and time periods purchased. We retain the records in our political file for a period of two years. The political file is available for public inspection during regular hours at the Station's main studio.

WEEKEND ACCESS. The Station will permit federal candidates (but not state and local candidates) to place time orders and change or edit copy outside of regular business hours on the weekend before the election. Contact the Station for more specifics.

NON-DISCRIMINATION POLICY. The Station does not discriminate in advertising contracts on the basis of race or gender. Any provision in any order or agreement for advertising that purports to discriminate on the basis of race or gender, even if handwritten, typed or otherwise made a part of a particular contract, is hereby rejected.

DISCLOSURE IS NOT AN OFFER TO SELL. THIS STATEMENT OF POLICY DOES NOT CONSTITUTE AN OFFER TO SELL ADVERTISING TIME, NOT IS IT A CONTRACT. RATHER, IT IS A STATEMENT OF THE POLICIES THAT THE STATION ATTEMPTS TO FOLLOW IN GOOD FAITH IN CONNECTION WITH THE SALES AND PLACEMENT OF POLITICAL ADVERTISING. THE TERMS OF ANY ACTUAL SALE ARE CONTAINED IN THE SALES CONTRACT AND NONE OF THE MATTERS IN THIS STATEMENT OF POLICY ARE INCORPORATED BY REFERENCE INTO THE SALES CONTRACT.

STATION RATES