

WTOL-TV (CBS) and WUPW-TV (FOX) ONLINE PUBLIC FILES  
2013 and 2014 Commercial Certification Statements  
Incident – 2/25/16

**2/25/16**

Approximately 11:45AM ET

During a routine cleanup of the WTOL and WUPW online public files, the 4<sup>th</sup> Qtr 2013 and 1<sup>st</sup> through 4<sup>th</sup> Qtr 2014 *Records Concerning Commercial Limits in Children's Programs* were inadvertently deleted by Lisa McManus, Program Manager. Lisa immediately contacted Beverly Eddy, Paralegal at Raycom Media corporate offices and explained what had occurred.

Approximately 12PM ET

Beverly and Lisa contacted Christopher Petite of Covington & Burling law firm. During the conversation, it was noted that a recovery function is available on each online public file under the RECYCLE BIN tab. Lisa then attempted to recover all of the deleted files for each station on the site.

Approximately 12:30PM ET

After trying unsuccessfully to retrieve the deleted files on each station's site, Lisa called Christopher again to advise of the status. Christopher contacted the FCC Media Bureau who confirmed that recovery actions on the sites should be instantaneous. As this was not what Lisa was experiencing when she tried to recover the deleted files, the FCC contact (Hossein Hashemzadeh) agreed that the Media Bureau would try to restore them and would notify Christopher when they did.

2:21PM ET

Mr. Hashemzadeh confirmed to Christopher that he was able to "recover the files for WTOL with no problem" and suggested that we try to restore the deleted WUPW files. Christopher conveyed this to Lisa via email.

3:51PM ET

Lisa sent an email to Christopher to confirm that the deleted files for both WTOL and WUPW had been restored to each station's online public files. At the time of restoration, however, it was noted that the time stamp on the restored files indicated the day's date (2/25/16) instead of when the commercial certification statements were originally uploaded (i.e. the dates of original filing with the FCC).

3:57PM ET

Christopher Petite replied to Lisa's email and noted that he had asked the FCC staff to weigh in on the issue and to hopefully restore the original as-filed time stamps. At this time, Lisa was instructed to retain any/all correspondence that pertains to this issue as it may be needed going forward.

4:12PM ET

Lisa sent an email to Beverly Eddy and Lisa Cruz, Raycom Corporate Program Manager to confirm that the deleted files for both WTOL and WUPW had been restored to each station's online public files and to notify them of the time-stamp issue. They were also advised that the FCC Media Bureau contact would be looking into the matter further and would contact Christopher Petite when any update was available.

**2/25/16 (continued)**

4:30PM ET

Lisa continued monitoring WTOL and WUPW online public files to see if any further action had been taken by the FCC Media Bureau staff to update the time stamps.

**2/26/16**

Entire Day; various times

Lisa continued monitoring WTOL and WUPW online public files to see if any further action had been taken by the FCC Media Bureau staff to update the time stamps.

**2/29/16**

9:59AM ET

Received email from Christopher Petite noting that he is giving additional time to the Media Bureau to deal with the file date restoration for WTOL & WUPW.

10:07AM ET

Lisa replied to Petite, Eddy and Cruz to confirm that continual monitoring was being done and that a timeline would be created to include as part of the documentation of the issue.

**3/2/16**

9:40AM ET

Received email from Christopher Petite that the FCC Media Bureau contact (Hossein Hashemzadeh) has confirmed that the current system will not allow for the restoration of the original upload dates when a deleted file is restored. Further information – when the FCC announced that radio stations and cable entities will begin to maintain online public folders, the MB staff redesigned the filing system to accommodate the new filers. With this re-design, the new system will have an ability to always retain the original as-filed date. This does not, however, resolve the current issue. It was confirmed that a careful record of what transpired in this instance with the inadvertent deletion of the commercial certifications would be kept as originally planned.