



SINCLAIR BROADCAST GROUP

PUBLIC FILE SELF-AUDIT

Quarter: 4
Year: 2018

Station Call Letters: WWMB

Market City: Myrtle Beach

Market State: SC

This self-audit is comprised of information obtained from the Commercial Radio and Television Station Public Inspection Folder Advisory produced by Pillsbury Winthrop Shaw Pittman. Please refer to the Advisory for complete descriptions and instructions on maintenance of your Public File. This self-audit must be completed quarterly to ensure that our folders are up to date and our licenses are not in jeopardy.

Regarding Digital Sub-Channels

Digital sub-channels are not separate television broadcast stations. Digital sub-channels are licensed under each station's main digital channel. The FCC's Public File requirements are per full power or Class A television broadcast station, not per channel. Stations are not to keep separate public files for digital sub-channels.

Political. If a digital sub-channel airs Political Ads, the associated documents are to be maintained within the station's main channel's public file (hard copies and on-line).

Quarterly Reports. All quarterly reports and certifications such as Children's Television Reports (Form 398), Commercial Limits Certification, and Quarterly Programs/Issues Reports are completed and filed per station, and will contain information relating to its digital sub-channel(s). Separate quarterly reports and certifications are not completed and filed per digital sub-channel.

The following items MUST be included in the stations Public File:

(e)(1) Authorization. A copy of all current FCC authorizations to construct or operate the station, along with any other documents necessary to reflect changes to the authorization or any conditions that the FCC has placed on the authorization. Note that this requirement is separate from the requirement that the station post its licenses at the transmitter control point. While the rule does not explicitly require the inclusion of authorizations for auxiliary facilities in this

portion of the file, our informal discussion of this issue with FCC staff leads us to recommend such inclusion as a prudent course of action. **Note: A number of these items are auto-linked by the FCC to the station's online Public File; however, it is the station's responsibility to ensure that the authorizations folder is complete.**

Retention Period: The current authorizations must be retained until they are replaced by new authorizations, at which time copies of the new authorizations must be placed in the file.

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(2) Applications and Related Materials / (e)(2) Waiver Requests. A copy of any application tendered for filing with the FCC, together with all related material, and copies of Initial Decisions and Final Decisions in cases involving an administrative hearing, as well as a notation regarding any petitions to deny filed against the application, with the name and address of the party that filed the petition.

Note: Any documents or items filed with the FCC which are related to the above applications must be placed in the public inspection file along with the applications themselves. Such related documents include, but are not limited to, exhibits filed as part of the application, amendments to the application, and subsequent correspondence between the FCC and the applicant concerning the application.

Retention Period: Applications must be retained until final action has been taken, except that applications for a new construction permit or assignment or transfer granted pursuant to a waiver showing shall be retained for as long as the waiver is in effect. License renewal applications which are granted for a shortened term must be retained until final action has been taken on the license renewal application filed immediately following the short-term renewal.

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(3) *Citizen Agreements.* A copy of every written citizen agreement.

Note: A citizen agreement is defined as a written agreement between a broadcast applicant, permittee, or licensee and one or more citizens or citizen groups that are entered for primarily non-commercial purposes. Such agreements are currently very rare.

Retention Period: For the term of the agreement, including any renewal or extension of the agreement (hard copy and online).

Indicate whether this folder is complete and has been correctly included in the Public File.

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(4) *Contour Maps.* A copy of current service contour maps submitted as part of any application tendered to the FCC, along with any information from such applications showing main studio and transmitter location.

Retention Period: For as long as the documents reflect current, accurate information regarding the station.

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(5) *Ownership Reports and related materials.* A copy of the most recent, complete ownership report (Form 323) filed with the FCC for the station, together with all related documentary material required to be filed with the FCC pursuant to Sections 73.3613 and 73.3615 of the FCC rules, or an up-to-date list of such contracts. Licensees or permittees who choose to retain a list of contracts must provide a copy of such contracts to requesting parties within seven days. In the case of television only, such documents include copies of all network affiliation agreements or understandings. For purposes of this rule, “network” is defined as “any person, entity or corporation which offers an interconnected program service on a regular basis for 15 or more hours per week to at least 25 affiliated television licensees in 10 or more states; and/or any person, entity or corporation controlling, controlled by or under common control with such person, entity or corporation.” ***Note: The Ownership Report is filed with the FCC***

directly by outside FCC counsel and is auto-linked by the FCC to the station's online Public File; however it is the station's responsibility to ensure that the Ownership Report is in fact linked to the station's online Public File.

Retention Period: Until a new, complete ownership report is filed with the FCC, at which time a copy of the new report and any related materials must be placed in the public inspection file.

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(6) Political File. Records concerning requests for time and dispositions thereof by candidates for public office, in accordance with Section 73.1943 of the FCC's rules.

Note: Such records include (a) a listing of all requests for broadcast time made by or on behalf of candidates for public office, (b) the disposition of each request, (c) if the request was granted, the charges imposed for the broadcast time, and (d) if free broadcast time was provided, a record of such time. For further information and details, please refer to the latest edition of the communications practice group's **Political Broadcasting Advisory**.

Note: Political orders must be promptly filed at the time the order is complete.

Retention Period: Two years.

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(7) Equal Employment Opportunity. On November 7, 2002, the FCC adopted new equal employment opportunity regulations under Section 73.2080 (the "new EEO Rule"). Those regulations became effective on March 10, 2003. Station employment units ("SEUs") with 5 or more full-time employees ("Nonexempt SEUs") must, in addition to other obligations spelled out in the new EEO Rule, retain certain records as well as annually, on the anniversary of the date a station is due to file its license renewal application, place in the public inspection files of all stations comprising the Nonexempt SEU, and on the home page of the web sites of all such

stations, an EEO Public File Report containing the following information (although if a broadcast licensee acquires a station pursuant to FCC Form 314 or 315 during the twelve months covered by the EEO Public File Report, its EEO Public File Report shall cover the period starting with the date it acquired the station):

- (i) a list of all full-time vacancies filled by the station's employment unit during the preceding year, identified by job title;
- (ii) for each such vacancy, the recruitment source(s) utilized to fill the vacancy (including, if applicable, organizations entitled to notification pursuant to paragraph (c)(1)(ii) of section 73.2080, which should be separately identified), identified by name, address, contact person and telephone number;
- (iii) the recruitment source that referred the hiree for each full-time vacancy during the preceding year;
- (iv) data reflecting the total number of persons interviewed for full-time vacancies during the preceding year and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies; and
- (v) a list and brief description of initiatives undertaken pursuant to paragraph (c)(2) of section 73.2080 during the preceding year.

In addition, FCC Form 396 ("Broadcast Equal Employment Opportunity Program Report"), which is required to be filed with the FCC immediately before the station's application for renewal of license is due to be filed, must also be placed in the public inspection files of all stations, irrespective of the number of full-time employees comprising the SEU.

FCC Form 396-A ("Broadcast Equal Employment Opportunity Model Program Report"), which is required to be filed with any FCC Form 301, 314 or 315 application involving an applicant which intends to employ 5 or more full-time employees, must be placed in the public inspection file for the station or stations which are the subject of the 301, 314 or 315 applications.

FCC Form 397 ("Broadcast Mid-Term Report"), which is due to be filed by television SEUs with 5 or more full-time employees, and by radio SEUs with 11 or more full-time employees, must be placed in the public inspection files of all stations comprising the SEU which is making the filing.

The obligations of religious broadcasters, as defined in the new EEO rule, differ from those of nonreligious broadcasters. Since the EEO Rule is new and the FCC intends to enforce it vigorously, religious broadcasters should carefully review the rule.

At this time, there is no requirement that broadcast stations file FCC Form 395-B ("Annual Employment Report") with the Commission. However, the FCC has under consideration (i) a proposal to reinstitute the requirement, (ii) a proposal to extend all aspects of the new EEO Rule to part-time positions, and (iii) various petitions for reconsideration and clarification of

the new rule. If the FCC reinstates the Form 395-B requirement, it may require stations to place such reports in their public inspection files and/or on their web sites.

Retention Period: Until final action is taken on the station's next license renewal application (normally eight years, the length of a standard broadcast license term. Each Annual EEO Public File Report must remain in the public inspection file for such period of time. However, the Annual EEO Public File Report, which is posted on the station's web site, may be removed when the next Annual EEO Public File Report is so posted.

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy, online and on station's website home page).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(8) *The Public and Broadcasting (Manual).*

Note: The current edition of the Manual is dated July 2008. Stations are required to provide a free copy of the Manual to members of the public requesting it.

Retention Period: Perpetual.

Indicate whether this folder is complete and has been correctly included in the Public File.

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(9) *FCC Investigations and Complaints.* Licensees are required to retain material relating to a matter which is the subject of an FCC complaint or investigation until the licensee is notified by the Commission that the material may be discarded.

Retention Period: Indefinitely until the FCC indicated the material may be discarded.

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(10)(i) *Quarterly Programs/Issues Lists.*

Note: A list which, in the exercise of the licensee's good faith judgment, represents approximately five to ten of the most significant issues facing the station's service area, and the programs which the station broadcast during the preceding three-month period to address those issues. Quarterly Issues/Programs Lists must be placed in the file on January 10 (for the period October through December), April 10 (for the period January through March), July 10 (for the period April through June) and October 10 (for the period July through September) of each year. Each list should have a short narrative statement describing the issues identified by the station and the programming that responded to each issue. Descriptions of programs should include the date, time, duration and title of each program, as well as a brief description.

Retention Period: Until final action is taken on the station's next license renewal application (normally eight years, the length of a license term).

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(10)(ii) *Children's Television: Commercial Limits.* Material demonstrating compliance with children's television commercial limits.

Note: Commercial TV stations must include records that are adequate to substantiate that the station complied with the limits on commercial advertisements in children's programming established in 47 U.S.C. Section 303a and implemented by 47 C.F.R. Section 73.670 (*i.e.*, 12 minutes per hour on weekdays and 10.5 minutes per hour on weekends). As with the Quarterly Issues/Programs Lists, this material must be placed in the file on January 10, April 10, July 10 and October 10 of each year.

Retention Period: Until final action is taken on the station's next license renewal application (normally eight years, the length of the license term).

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(10)(iii) Children’s Television Programming Reports. For commercial TV broadcast stations, on a quarterly basis, a completed Children’s Television Programming Report (“Report”), on FCC Form 398, reflecting efforts made by the licensee during the preceding quarter, and efforts planned for the next quarter, to serve the educational and informational needs of children. The report for each quarter is to be placed in the public inspection file by the tenth day of the succeeding calendar quarter. By this date a copy of the Report for each quarter is also to be filed electronically with the FCC. The Report shall identify the licensee’s educational and informational programming efforts, including programs aired by the station that are specifically designed to serve the educational and informational needs of children and it shall explain how programs identified as Core Programming meet the definitions set forth in 73.671(c). The Report shall include the name of the individual at the station responsible for collecting comments on the station’s compliance with the Children’s Television Act, and it shall be separated from other materials in the Public Inspection File. The Report shall identify the program guide publishers to which information regarding the licensee’s educational and informational programming was provided as required in 73.673, as well as the station’s license renewal date.

Notes: Within a few days of submitting the Report through the FCC’s online filing system, the Report is auto-linked by the FCC to the station’s online Public File, however it is the station’s responsibility to ensure that the Report is in fact linked to the station’s online Public File. Website Certification should be filed quarterly along with the Form 398 in the Public File with the same retention period.

Retention Period: These Reports shall be retained in the Public Inspection File until final action on the station’s next license renewal application. (normally eight years, the length of a license term). Licensees shall publicize in an appropriate manner the existence and location of these Reports.

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(11) Radio Issues/Programs List Folder (Radio Stations Only).

Note: An Issues/Programs List is a list which, in the exercise of the licensee's good faith judgment, represents approximately five to ten of the station's *most significant* treatments of community issues facing the station's service area during the past calendar quarter, including the programs which the station broadcast during the past quarter to address those issues. Quarterly Issues/Programs Lists must be placed in the file by January 10 (for the period October through December), April 10 (for the period January through March), July 10 (for the period April through June) and October 10 (for the period July through September) of each year. Each list should have a short narrative statement describing the issues identified by the station and the programming that responded to each issue. Descriptions of programs should include the date, time, duration and title of each program, as well as a brief description.

Retention Period: Until final action is taken on the station's next license renewal application (normally eight years, the length of the license term).

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy only).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(12) Local Public Notice Announcements Folder. A statement certifying compliance with the requirement of local public notice of the filing of a license renewal application.

Note: The dates and times that the pre-filing and post-filing license renewal application notices were broadcast and the text of those notices must be made part of the certifying statement.

Retention Period: As long as the application to which it refers must be retained.

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(13) Radio and Television Time Brokerage Agreements. For commercial radio and television stations, a copy of every agreement or contract involving time brokerage of the licensee's stations or of another station by the licensee, whether the agreement involves stations in the same markets or in differing markets, with confidential or proprietary information redacted where appropriate. (such as the price paid by the broker). **Note: This type of document should have financial information redacted before posting.**

Retention Period: As long as the contract or agreement is in force.

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(14) Television Station Must Carry/Retransmission Consent Election Statement.

Note: Under the Cable Act, television stations must elect either must-carry status or seek retransmission consent with cable systems every three years. This rule requires that television broadcast stations place copies of all must-carry/retransmission consent election letters in the public inspection file by the election deadline.

Retention Period: For the duration of the applicable must-carry/retransmission consent period (usually occurs every 3 years).

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(15) Radio and Television Joint Sales Agreements. Copies of any agreements for the joint sale of advertising time involving the station, whether such agreements involve stations in the same or different markets. Confidential or proprietary information must be redacted from the copies placed in the folder.

Note: Any joint sale of advertising time between stations, even if they are in different markets, must be included in this folder.

Retention Period: Although the rule does not specifically provide for a retention period, the agreement should probably be retained in the folder for as long as it is in force.

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(16) Class A TV Continuing Eligibility (Class A TV Stations Only). Documentation sufficient to show compliance by the station with the Class A eligibility requirements set forth in Section 73.6001 of the FCC rules.

Note: The requirements of Section 73.6001 are that Class A stations broadcast a minimum of 18 hours per day, and an average of at least three hours per week of locally produced programming each quarter.

Retention Period: Although the rule does not specifically provide for a retention period, a reasonable reading would indicate that the documentation should be updated every calendar quarter to show continuing eligibility.

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(17) Sponsorship Identification.

Note: Whenever a station broadcasts material that is political in nature or that involves a controversial issue of public importance, *and* a corporation, committee, association, unincorporated group, or other entity is paying for or furnishing the broadcast material, the station must place a list in its public inspection file of the chief executive officers, executive committee members, or members of the board of directors of the entity paying for or furnishing the broadcast material.

Retention Period: Two years.

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

(e)(18) *Bipartisan Campaign Reform Act of 2002 (BCRA)- (Political Matters of National Importance).*

Note: This record retention requirement is not part of the FCC’s public inspection file rule, but rather comes directly from Congress via the BCRA of 2002. We recommend that the material referred to be kept in a folder marked “Political/Legislative Issues/Matters of National Importance.” The Act requires licensees to maintain, and make available for public inspection, a complete record of *requests* to purchase broadcast time that communicate a message relating to any matter of national importance, including a legally qualified candidate, any election to Federal office, or a national legislative issue of public importance. The record must contain: (a) the issue to which the advertising refers (as applicable); (b) whether the request to purchase broadcast time was accepted or rejected by the station; (c) the rate charged for the time; (d) the date and time on which the advertising aired; (e) the class of time that was purchased; and (f) the name of the entity purchasing the time, along with the name, address and phone number of a contact person for such entity, and a list of the chief executive officer or members of the executive committee or of the board of directors of such entity. Please refer to **Special Bulletin to Broadcasters**, SB No. 02-16 (November 26, 2002) for further information.

Retention Period: Two years.

Indicate whether this folder is complete and has been correctly included in the Public File (hard copy and online).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

**(e)(19) QUARTERLY FILING CHECKLIST
*Children’s Television: Commercial Limits***

Indicate whether this quarterly certification is complete and has been correctly included within the station’s Public File (hard copy and on-line).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

Children’s Television Programming Reports (Form 398) and Website Certification

Indicate whether this quarterly report is complete, filed online, and has been correctly included within the station’s Public File (hard copy and on-line).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

Quarterly Programs/Issues Lists

Indicate whether this report is complete and has been correctly included in the station’s Public File (hard copy and on-line).

Yes: No:

If you checked No, please include an explanation of what is missing and what will be done to remedy the problem.

Please indicate who reviewed the Public File, hard copy and on-line files, and have them sign-off on the Public File Self-Audit, along with the Business Manager and General Manager.

Reviewer: Clyde Vanel
Date of Review: 01/28/2019

Business Manager:
Date:

General Manager: /Clyde Vanel/
Date: 01/28/2019