



**Cleveland, Ohio WENZ-FM, WZAK-FM, WJMO, WERE
Political Broadcast Advertising Disclosure Statement
Cleveland Primary Election as of March 19, 2023**

Legally Qualified Candidates: The stations provide political advertising to candidates who are legally qualified by either (1) publicly announcing their candidacy for a specific office; or having made a substantial showing of genuine candidacy, and (2) if elected, are qualified under the applicable federal, state or local law to hold office. Candidates for federal office are afforded “reasonable access” to air their political commercials. The stations are not required by law to sell advertising time to state and local candidates. Nonetheless, the stations maintain the right to exercise our good faith judgment to determine which state or local races, if any, are of greatest significance and therefore the stations may refuse to sell time to candidates for non-federal races.

Candidate “Uses”: A “use” is defined as a non-exempt *positive appearance* on the air by a legally qualified candidate in which, the candidate’s voice is identified or is “readily identifiable” by the listening audience. Thus, “use” can be conveyed by the candidate reading the sponsorship tag or the candidate being identified as the person reading the tag; i.e., “Paid for by...” or “Sponsored by...” Such sponsor identification complies with the requirements of Section 317 of the Communications Act. The purchase of time by the candidate or the candidate’s authorized campaign committee, or authorized agent with the use of the candidate’s voice to promote his or her election to office, qualifies as authorized “use”.

Equal Opportunities: A station that permits a “legally qualified” candidate for public office to “use” its facilities must then afford “equal opportunities”, often referred to as “equal time,” to all other candidates for that office. A candidate acquires a right to equal opportunities only when an appearance is made by an “opposing” candidate. A candidate’s right to equal opportunities arises only when a timely request is made, and such requests must be made within seven days of an appearance by an opposing candidate. The stations also may limit the amount of time sold if: (1) the grant of the request would seriously interfere with the station’s duty to program in the public interest or (2) the grant of the request would give the last-minute purchaser an unfair advantage over opposing candidates by allowing him or her to saturate broadcast time during the last few days before an election.

Political Rate Window: Political rates for legally qualified candidates are available during the 45-day period before a primary or primary run-off election and during the 60-day period before a general or special election. Under the “lowest unit rate” (LUR), and within the political windows for specific elections, the stations extend their most favorable quantity or volume discount to any legally qualified candidate regardless of the number of commercials purchased by the candidate. The LUR applies only to charges made for the same class and amount of time. The LUR is based on the most favored rates during the relevant weeks within the political rate window at the time of the request by a candidate to air his or her commercials. Since the most

avored quantity and volume discounts may vary within the political period; each station's LUR may vary. Outside of the political rate window for LUR, the stations may extend commercial time to legally qualified candidates at prevailing rates.

Other Ballot Advertising: Generally, "issue advertising" does not involve programs or announcements advocating the election or defeat of a political candidate. Accordingly, issue advertising is not subject to the general political broadcasting rules and not afforded the LUR. Nonetheless, issue advertising must comply with the FCC's rules on sponsorship identification and sponsorship list retention within the public file. Political action committees, other organizations, and individuals unaffiliated with a candidate who purchase time advocating the election or defeat of a particular candidate are not entitled to the LUR.

Availability to Place Political Commercials: During normal business hours, 8:30am until 5:30pm, Monday through Friday, legally qualified candidates may place advertising time by completing and signing the *National Association of Broadcasters (NAB PB-19) Agreement Form for Political Candidate Advertisements*, along with payment in advance by cash, certified check, or credit card authorization completed by the candidate or authorized committee. Advertising for political candidates may be placed and aired through Election Day.

Production, Tape, and Copy Delivery: Produced tapes for political commercials must be delivered to the radio station no later than twenty-four hours in advance of the scheduled commercials to ensure compliance with FCC sponsorship identification rules. Copy and any required production for political commercials must be provided to the station a minimum of two business days in advance of airing. Any excessive editing, dubbing, and remote recording will be subject to charges, rates to be determined. The stations reserve the right to alter any political advertisement to ensure compliance with the FCC's sponsorship identification requirements.

Classes of Time: The stations provide different classes of time for political candidates. The identifiable classes of time will define the time period, and the level of preemption, including the LUR. Each class of time and the accompanying rates will be identified in the attachment to this disclosure statement. Pre-emptible is the "lowest unit rate" and offers the station's most favored volume or quantity discounts. Pre-emptible time has a level of clearance between 20% and 30%. Non-pre-emptible time is a level of rates above the "lowest unit charge", having a level of clearance between 85% and 95%. When political commercials are preempted, the stations make every attempt to provide timely make goods within the schedule ordered. Commercials are made good in the same daypart or time period in which they were ordered, or a credit is issued if the commercial cannot be made good within the schedule. While the political candidate is afforded the LUR for the days and dayparts effective during the political window, the candidate may, at his or her own discretion, elect either class of time based on the level of preemption. In the case of candidates for federal office, the stations are required to provide reasonable access to each station's overall schedule. If a particular time period is sold out, the station must provide reasonable access to accommodate such time periods with available commercial inventory.

Right to Amend Political Rates and Transactions: The stations reserve the right to cancel or modify any sale of advertising made or contract entered into for the sale of time on the station, pursuant to the FCC's requirements regarding "equal opportunities" and "reasonable access" in the case of federal candidates. Where such cancellations or modifications are necessary, advertisers will be advised and rebates, schedule changes, or other adjustments will be made as may be appropriate.

Piggy Back Ads: We do not permit multiple candidates to split the cost of one ad. Such splitting would effectively lower the LUR and permit candidates to create a new class of ad. To the extent multiple candidates appear in one ad, one (and only) of the candidates must pay for the ad and provide all required “uses”, tags and paperwork. We cannot edit or censor such ads but we can require one candidate pay for the ad.

Not an Offer to Sell: This disclosure statement does not constitute an offer to sell time, nor is it a contract; rather, it is a statement of the policies that the stations, in good faith, attempt to follow in connection with the sale and placement of political advertising. The terms of any actual sales of time are contained in the stations’ sales contracts and none of the matters contained in this disclosure statement are incorporated by reference in the sales contracts.

Rate Card

Cleveland- Political Window- February 2- March 19, 2024

	LUR	LUR	Non Pre-emptible	Non Pre-emptible
WENZ	60	30	60	30
M-F 6a -10a	35	40	75	65
M-F 10a - 3p	40	40	75	65
M-F 3p - 7p	50	50	110	100
M-F 7p - 12mid	30	20	35	30
SA 6a-10a	25	20	40	35
Sa 10a-3p	35	30	50	45
SA 3p-7p	35	30	50	45
SA 7p-12m	15	20	30	25
SU 6a-10a	25	20	25	20
SU 10a-3p	35	30	35	30
SU 3p-7p	35	30	35	30
SU 7p-12mid	25	20	30	25

	LUR	LUR	Non Pre-emptible	Non Pre-emptible
WZAK	60	30	60	30
M-F 6a -10a	40	45	120	90
M-F 10a - 3p	50	40	115	100
M-F 3p - 7p	80	85	140	125
M-F 7p - 12mid	15	25	45	45
SA 6a-10a	30	25	40	35
Sa 10a-3p	45	40	65	55
SA 3p-7p	45	40	65	55
SA 7p-12m	20	15	35	25
SU 6a-10a	30	25	35	20
SU 10a-3p	45	40	65	55
SU 3p-7p	45	40	65	55
SU 7p-12mid	25	20	35	25

	LUR	LUR	Non Pre-emptible	Non Pre-emptible
WERE	60	30	60	30
M-F 6a -10a	10	5	25	20
M-F 10a - 3p	10	5	25	20
M-F 3p - 7p	10	5	25	20
M-F 7p - 12mid	10	6	25	20
SA 6a-10a	10	5	25	15
Sa 10a-3p	10	5	25	20
SA 3p-7p	10	5	25	20
SA 7p-12m	10	6	25	15
SU 6a-10a	10	5	25	20
SU 10a-3p	10	5	25	20
SU 3p-7p	10	5	25	20
SU 7p-12mid	10	6	25	15

	LUR	LUR	Non Pre-emptible	Non Pre-emptible
WJMO	60	30	60	30
M-F 6a -10a	10	5	25	20
M-F 10a - 3p	10	5	25	20
M-F 3p - 7p	10	5	25	20
M-F 7p - 12mid	10	6	25	20
SA 6a-10a	10	5	25	15
Sa 10a-3p	10	5	25	20
SA 3p-7p	10	5	25	20
SA 7p-12m	10	6	25	15
SU 6a-10a	10	5	25	20
SU 10a-3p	10	5	25	20
SU 3p-7p	10	5	25	20
SU 7p-12mid	10	6	25	15