

**POLITICAL ADVERTISING  
DISCLOSURE STATEMENT**

**OF**

**WKCF-TV**

**&**

**EKCF-TV/The Justice Network**

**Orlando/Daytona Beach, FL.**

**This Disclosure Statement is Effective  
for the Period Beginning on January 1, 2018  
and Ending on November 6, 2018**

Updated:  
February 16, 2018



Section 1  
**INTRODUCTION**

We wish to thank you for your interest in purchasing political advertising on WKCF-TV. It is our desire to furnish you complete information concerning our various advertising rates, policies, plans and packages and to assist you in making an informed decision concerning the purchase of advertising on our Station. In addition, we explain in this Disclosure Statement the application of certain provisions of the Communications Act of 1934, as amended and the Federal Election Campaign Act that apply to political broadcasting. This Disclosure Statement (“Disclosure Statement”) is being provided to you for that purpose.

Should you have any question concerning the Disclosure Statement, please let us know. We realize that the purchase of broadcast advertising time may be complex. We will be pleased to respond to your questions and to clarify, upon request, our various rate plans, sales packages and policies. All inquiries should be directed to:

*David Riva*  
General Sales Manager  
1021 North Wymore Road  
Winter Park, FL. 32789  
407-389-7630

Section 2  
**EQUAL OPPORTUNITY**

WKCF-TV will afford “equal opportunity” as determined by the Federal Communications Commission (“FCC”) for “uses” of WKCF-TV’s broadcast facility by all legally qualified candidates for the same office.

For purposes of the “equal opportunity” requirement, a “use” is defined as any nonexempt appearance by a candidate on WKCF-TV’s broadcast facility in which the candidate’s voice or likeness is identified or identifiable. Some candidate appearances, in news, news interviews, news documentaries, and involuntarily in the ads of opposing candidates do not normally qualify as a “use” and those appearances may be exempt from the “equal opportunity” law.

Section 3  
**ADVERTISING RATES**

It is our policy and practice to comply with all applicable FCC requirements with respect to rates charged by our station for political advertising. Thus, within the meaning of the FCC's rules, it is our policy to extend for the "use" of WKCF-TV's broadcast facility by "legally qualified candidates" during the "lowest unit charge period"—which is the forty-five (45) day period prior to a primary election and the sixty (60) day period prior to a general election—the "lowest unit charge" that WKCF-TV extends to its most favored commercial advertisers for purchase of the same class and amount of time for the same period. And we extend for the "use" of WKCF-TV's broadcast facility by "legally qualified" candidates *outside* the applicable 45/60 day "lowest unit charge" periods, advertising rates that are comparable to rates we charge to commercial advertisers for comparable uses.

Please note that advertising (1) which does not include an appearance by the candidate in which the candidate's voice or likeness is identified or is identifiable; (2) which is not purchased by the candidate or the candidate's campaign committee or authorized agent; or (3) which is otherwise exempt by law does not constitute a "use." Such advertising, therefore, would not qualify for the "lowest unit charge."

It should be noted that the meaning of the term "use" in connection with the "lowest unit charge" requirement differs from the definition of a "use" for purposes of the "equal opportunity" requirement. For example, please see the definition of a "use" in Section 2.

Finally, *federal* candidates must meet the requirements of the Bipartisan Campaign Finance Reform Act of 2002 ("BCRA") to qualify for the lowest unit charge. All contracts entered into with federal candidates seeking the lowest unit charge are subject to compliance with the following conditions:

(a) To receive the lowest unit charge during the applicable 45-day/60-day political windows, a candidate for *federal* office must provide a written certification to WKCF-TV stating that his or her advertisements will not mention any opponent unless at the end of such advertisement there appears simultaneously, for a period no less than 4 seconds—(i) a clearly identifiable photographic or similar image of the candidate; and (ii) a clearly readable printed statement, identifying the candidate and stating that the candidate has approved the broadcast and that the candidate's authorized committee paid for the broadcast. Such certifications shall be provided and certified as accurate by the candidate (or any authorized committee of the candidate) at the time of purchase.

(b) Where a federal candidate has supplied the above-referenced certificate, any ads submitted by that candidate must, in fact, comply with the certificate in order to be entitled to receive the lowest unit charge. In the event that a federal candidate's ad does not comply with the above-referenced certificate, that candidate will not necessarily be eligible for the lowest unit charge for any ads placed during any remaining lowest unit charge windows.

Section 4  
**REASONABLE ACCESS BY FEDERAL CANDIDATES**

Federal law affords candidates for federal office “reasonable access” to “use” a broadcast station’s facilities. We will afford “legally qualified” federal candidates, i.e., candidates for President, Vice President, U.S. Senate and U.S. House of Representatives, “reasonable access” for the “use” of our facilities.

Section 5  
**ACCESS BY NON-FEDERAL CANDIDATES**

Candidates for state and local office will be afforded access to WKCF-TV’s facilities subject to the time demands of federal candidates and our overall advertising availabilities. WKCF-TV may find it necessary not to accept or to limit the amount and class of advertising purchased by certain candidates for state and local offices.

WKCF-TV will sell announcements (also referred to as “spots”) to state and local candidates one week prior to the desired flight. For example, if a state or local candidate wants to purchase advertising on WKCF-TV, we will provide the candidate (or candidate’s agency) with availabilities and rates for our different classes of time, and percentages of preemption likelihood the week prior to the desired flight. We will continue this practice up to the primary election. Details of our classes of time are explained in section 6.

Section 6  
**HOW OUR ADVERTISING IS SOLD**

Advertising can be purchased in announcement, also referred to as “spot”, lengths and program lengths as described herein. Spots can be purchased by individual program areas, within “package plans”, defined rotators, broad rotators and direct response rotators. Our advertising rates are negotiated and established on an individual basis with each advertiser, and the rates vary depending on the class of time, overall market conditions, and advertiser demand at the time the order is placed. These demand-driven rates will be extended to all political candidates to whom we sell advertising.

We offer to all advertisers the following classes of time: (1) Non-Preemptible; (2) Preemptible with Notice; (3) Immediately Preemptible Without Notice; and (4) Defined and Broad rotators. A description and definition of each class follows:

1. Non-Preemptible (Section 1). These spots are purchased to run within a specific time period/program as disclosed on WKCF-TV’s regular rate sheet and the “LUC Estimates”. They are the most expensive class of time sold by WKCF-TV. For federal candidates, these spots will not be preempted by an advertiser offering a higher rate. However, these spots could be subject to preemption by a program change or in the event the program purchased is not airing and there are no available spots in the content

airing in its place (ie: breaking news, special programming), WKCF-TV will make an effort to offer comparable makegoods whenever possible. In the event that a program change results in a shift in time or date, WKCF-TV will move these spots with the program into its new time and/or date.

Additionally, spot(s) may be preempted if all spots in a particular time period/program for a particular day have been sold at the same class of time *and* an advertiser has more than one spot in said time period/program in order to comply with “reasonable access” requirements for federal candidates.

WKCF-TV reserves the right to not offer a spot to an advertiser in the event that a program is completely sold out at “Section 1” rates. In this event, comparable options will be offered whenever possible. For federal candidates, “equal opportunity” will apply to all time periods/programs sold. (See Section 8 for example.)

2. Preemptible with Notice (Section 2). These spots are purchased to run within a specific time period as displayed on WKCF-TV’s regular rate card and “LUC Estimates.” These spots are superior in terms of preemption and to Immediately Preemptible spots but subordinate to Non-Preemptible spots. Due to the volume of political activity on the station and the nature of log finalization deadlines (performed at the end of the day), often times preemption notification is given just prior to the scheduled air date/time. The likelihood of preemption is a function of a number of factors including demand and supply. We estimate this class of time will be preempted approximately 25% of the time. However, we will, upon request, provide you with a more current estimate of the likelihood of preemption when your order is placed. Spots that are preempted from this class of time may be bought back in to that same time period for that same week only by purchasing the higher class of time (or “Section 1”). If the time period is sold out at “Section 1”, WKCF-TV will offer makegoods whenever possible and time permitting.

3. Immediately Preemptible Without Notice (Section 3). These spots are scheduled to be broadcast at a specific time period as displayed on WKCF-TV’s regular rate card and “LUC Estimates.” These time period spots carry the risk of preemption by Non-Preemptible and Preemptible with Notice spots. They are the least expensive class of time sold in specific time periods. The likelihood of preemption is a function of a number of factors including demand and supply. We estimate this class of time will be preempted approximately 50% of the time. However, we will, upon request, provide you with a more current estimate of the likelihood of preemption when your order is placed. Spots that are preempted from a specific time period/program may be bought back into that same time period/program by purchasing that spot at a higher class of time. For example, if a “Section 3” spot is preempted, the advertiser may buy that spot back into that same program by purchasing at the “Section 2” or “Section 1” rate level. In the event that a program is sold out at “Section 2”, the advertiser must buy back in at “Section 1”. If the time period is sold out as “Section 1”, WKCF-TV will offer makegoods whenever possible and time permitting.

4. Defined and Broad Rotators. We offer to all advertisers the option of purchasing advertising in defined and broad rotators. WKCF-TV does not guarantee any specific or balanced rotation or placement of these spots. All spots purchased in specific time periods will take precedence over these rotations regardless of rate. The likelihood of preemption is a function of a number of factors including demand and supply. We estimate this class of time will be preempted approximately 75% of the time on WKCF-TV and 20% of the time on EKCF-TV. Makegoods may be offered but there is no guarantee of placement.

5. Run of Schedule. These announcements are run during specified or negotiated time periods. They are scheduled at the discretion of the Station and run only if no higher paying advertiser purchases the time period during which they are scheduled. At current selling levels, we estimate that these announcements are preempted approximately fifty percent (50%) of the time on WKCF-TV and 35% of the time on EKCF-TV. The likelihood of preemption is a function of a number of factors including demand and supply. We will, upon request, provide you with a more current estimate of the likelihood of preemption when your order is placed.

## Section 7 TIME UNITS AVAILABLE

WKCF-TV customarily sells commercial time in thirty (30)-second units. Sixty (60) second, fifteen (15)-second, ten (10)-second, and five (5)-second units are also sold.

- Five and Ten-second announcements are typically purchased at 50% of the 30-second rate. However, variations occur by individual time periods/rotations/classes of time. Both five and ten-second positions are limited and may not be available. A five and/or ten-second rate card will be made available upon request.
- Fifteen-second announcements are typically purchased at 65% of the 30-second rate. However, variations occur by individual time periods/rotations/classes of time. Fifteen-second positions are limited and may not be available. A fifteen-second rate card will be made available upon request.
- Sixty-second announcements are typically purchased at double the 30-second rate. However, variations occur by individual time periods/rotations/classes of time. Sixty-second positions are limited and may not be available. A sixty-second-rate card will be made available upon request.
- Ninety-second announcements are typically purchased at triple the 30-second rate. However, variations occur by individual time periods/rotations/classes of time. Ninety-second positions are limited and may not be available. A ninety-second-rate card will be made available upon request.

- Two-minute (One hundred twenty second) announcements are typically sold at four times the 30-rate. However, variations occur by individual time periods/rotations/classes of time. Two-minute positions are limited and may not be available. A two-minute rate card will be made available upon request.

WKCF-TV does not routinely sell time in units of more than 60-seconds duration, although requests by political candidates to purchase longer form program time will be evaluated on a case-by-case basis. We request that you inquire of us if you are interested in purchasing longer form program time, and we will review with you the availabilities and rates that would be applicable both outside and within the “lowest unit charge” periods. The 5-second units on the Station are also available on a very limited basis and requests will be evaluated on a case-by-case basis.

Federal candidates will be afforded “reasonable access” to all time units, and all candidates for the same office will be assured “equal opportunity” in the placement, purchase and amount of time.

Section 8  
**PREEMPTION PRIORITY FOR  
THE SAME CLASS OF TIME**

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In the event that orders for the same class of spots for the same time period should exceed WKCF-TV’s available inventory, we will, subject to the “reasonable access” requirements for federal candidates, establish a scheduling priority for the spots on the following basis:

1. Outside the lowest unit charge “LUC” periods, priority will be given to the schedule of spots with (a) the closest last telecast date of the schedule, (b) class of time purchased, (c) the higher unit rate, and (d) WKCF-TV’s most favored advertisers (not necessarily in that order).
2. During the lowest unit charge “LUC” periods, political advertisements qualifying for the “LUC” will be afforded scheduling parity with advertisements purchased by WKCF-TV’s most favored commercial advertisers by class of time. In the event a commercial advertiser and political advertiser order the same time period/program in the same class of time and the inventory available on that program cannot accommodate both, the federal candidate will be afforded priority.

Spots may be preempted in the event that all spots in a particular program/time period have been sold at the same class of time and an

advertiser has more than one spot in said program/time period. It may also be necessary to preempt a federal candidate's spot(s) in a program/time period in order to comply with "reasonable access" for all federal candidates.

For example, some ABC primetime programs have only five spots available in a given night. Of these five available spots, two are purchased by federal candidate A, and one spot each is purchased by federal candidates B, C, and D. In this event, WKCF-TV reserves the right to preempt one of candidate A's spots to allow for federal candidate E to purchase a spot at the same non-preemptible rate to allow for equal access. WKCF-TV reserves the right not to offer a spot for sale to an advertiser in the event a particular program/time period is sold out to federal candidates at the non-preemptible rate. This would occur when there are more federal candidates than there are available spots in a given program/time period. Should this occur, federal candidates will be offered makegoods whenever possible.

#### Section 9 **MAKE GOOD POLICY**

In the event an Immediately Preemptible, Preemptible with Notice, Non-Preemptible (See Section 8), Defined and Broad Rotator, or Run of Schedule spot is preempted for any reason, including a technical error or any other circumstance beyond the station's control, reasonable effort will be made to make good the spot in a comparable time period(s) whenever possible. If a make good cannot be offered, we will either issue a credit or rebate as the advertiser elects.

#### Section 10 **RATES OUTSIDE THE LOWEST UNIT CHARGE PERIODS**

Please note that outside the lowest unit charge "LUC" period, WKCF-TV charges political advertisers rates comparable to our regular commercial advertisers.

#### Section 11 **CURRENT LOWEST UNIT CHARGE RATE**

The rates listed on our current rate card constitute, as of the current date, the "lowest unit charge" rates for the various classes and units of time in the same time periods described above. These rates apply during the forty-five (45) day and sixty (60) day "lowest unit charge" periods prior to each election. Again, political advertisers should be aware that because our rates are negotiated with each advertiser and rise and fall based upon overall advertiser demand, these rates are subject to change. Moreover, it is not always possible to determine the "lowest unit charge" for any given week until all

advertising for that week has been broadcast. When necessary, credits or rebates will be issued.

Section 12  
**CURRENT RATES AND SELLING LEVELS**

During the lowest unit charge period, WKCF-TV will furnish all legally qualified candidates (who have requested time) the most current rates, current selling levels (i.e., estimated likelihood of preemption) and program changes for each week. We endeavor to send this information at least one week in advance. Outside the lowest unit charge period, WKCF-TV will provide the most current rates upon request.

Section 13  
**AUDIENCE DELIVERY**

We may, in some circumstances, negotiate with an advertiser to provide a certain agreed upon (i.e., contractual) audience delivery rating for a specific advertising purchase. We do not provide cash refunds or rebates to any commercial or political advertiser as the result of our failure to deliver an estimated audience rating, rather, in the event that ratings information indicates that an agreed upon audience delivery is not achieved, we may offer to run bonus spots. The provision of such bonus spots will be governed by the terms of our agreement with the advertiser; however, bonus spots are subject to other time demands and availability and may not be offered in the same time periods as the original schedule. A determination of the need for such bonus spots also may be analyzed based on the cumulative delivery of an advertiser's advertising schedules.

In the absence of a contractual obligation to provide a certain agreed upon audience delivery rating, we may, upon request, attempt to estimate the audience rating for a specific advertising purchase. We do not guarantee that a particular advertising schedule will deliver that estimated rating, we do not provide cash refunds or rebates to any commercial or political advertiser as the result of our failure to deliver an estimated audience rating, and we have no obligation to run any bonus spots if our rating information indicates that the Station delivered less than the estimated audience rating. If we offer to run any bonus spots, in our discretion, they are subject to other time demands and availability and may not be offered in the same time periods as the original schedule.

As a practical matter, political advertisers should note that the ability of the station to provide bonus spots for audience underdelivery may be limited or unavailable – in some cases due to lack of audience ratings data or due to inventory constraints during the political season. As a result, it may not be possible for the station to air bonus spots until after the election. Accordingly, any bonus advertising announcements that might be offered may be of no value to political advertisers. Rebates in these circumstances will

not be made to political candidates because we do not make rebates to commercial advertisers for underdelivery of estimated audience ratings.

Section 14  
**PACKAGE PLANS**

WKCF-TV offers various package plans. The rates in these packages are available to “legally qualified” candidates both outside and within the lowest unit charge “LUC” periods. We encourage you to consult us to determine if any of the plans would be appropriate for your advertising needs.

However, some package plans include five second (:05) billboards that announce the advertiser is sponsoring a particular program or segment of a program (i.e. “Tonight’s weather is brought to you by Advertiser X”). WKCF-TV does not allow nor is required to offer political advertisers the opportunity to sponsor any segment of our newscast or any other locally produced WKCF-TV programming. This is done to safeguard against the appearance of station favoritism toward one or more candidate(s).

Section 15  
**PER INQUIRY AND DIRECT RESPONSE RATES**

WKCF-TV accepts direct response advertising. Direct response commercial typically include a phone number for consumers to purchase products and/or order services. These spots are scheduled at the discretion of WKCF-TV and run only if any of the individual time periods included are not sold out. These rotations carry the lowest priority for clearance. Direct response preemptions are credited and no makegoods are not offered for these rotations.

WKCF does not accept Per Inquiry advertising. However, we do accept Per Inquiry advertising on EKCF (The Justice Network). Per Inquiry advertising is utilized by advertisers selling goods or services. It is designed to pay the station for the advertising based on lead generation and or sales. Due to the nature of this advertising, it is not applicable to political advertising and therefore not available.

Section 16  
**NON-CASH MERCHANDISING AND  
PROMOTIONAL ADVERTISER INCENTIVES**

WKCF-TV may offer various non-cash merchandising and promotional incentives to commercial advertisers. These incentives are not available to political advertisers where the certain value of such merchandise is de minimis or the non-cash incentive plans or promotions reasonably imply a relationship between WKCF-TV and the advertiser.

Section 17  
**AGENCY AND CANDIDATE COMMISSIONS**

WKCF-TV customarily provides a fifteen percent (15%) discount for advertising purchases made by an advertising agency. Political candidates and authorized campaign committees who purchase time without an advertising agency will be extended a fifteen percent (15%) discount.

Section 18  
**POLITICAL ADVERTISING DURING NEWS PROGRAMS**

We accept political advertisements during network or local news programming. We will provide “reasonable access” to federal candidates in all newscasts. We reserve the right to limit the number of spots purchased by state or local candidates in any newscast to ensure our ability to provide “equal opportunity” to all candidates and “reasonable access” to federal candidates.

Section 19  
**PRODUCTION CHARGES**

WKCF-TV produces spot announcements for any commercial or political advertiser that requests this service. Should you be interested in having a political commercial produced, please contact:

**Eric Bloom**  
**National Sales Manager**  
**WKCF-TV**  
**1021 N. Wymore Road**  
**Winter Park, FL. 32789**  
**407-389-7620**  
**ebloom@hearst.com**

Charges for the production of political advertising will not exceed comparable production charges made to commercial advertisers. If you are interested in having us produce a political ad, we will provide you with production estimates. In order to prevent the appearance that WKCF-TV supports or favors any political candidate, we do not allow our on-the-air talent to appear in any political advertising.

## Section 20

### **SEPARATION OF COMPETITIVE POLITICAL ADVERTISEMENTS**

The Station's policy is to attempt, where possible, to separate competitive political advertisements. However, that may not always be possible, and the Station does not promise or warrant that competitive announcements will be separated.

## Section 21

### **SPONSORSHIP IDENTIFICATION**

All political advertisements must fulfill sponsorship identification requirements established by the FCC. The identification must state that the broadcast is "sponsored by", "paid for by", or "furnished by" the identified person on whose behalf the advertising is purchased. **All television ads must contain a visual identification in letters equal to or greater than four percent (4%) of the vertical picture height (i.e., no less than 20 scan lines for SD and 42 scan lines for HD) for a period of not less than four (4) seconds.** Should a candidate's ad not be submitted in sufficient time for a pre-airing review or not contain the proper identification, WKCF-TV will add the required material within the announcement. This may result in the content of the advertisement being truncated.

If the length of the sponsored broadcast is 5 minutes or less, only one announcement is required, and it may be made at either the beginning or conclusion of the programming. For sponsored broadcasts that exceed 5 minutes, please inquire about the necessary requirements for identification.

In addition, in order to receive the lowest unit charge during the applicable 45-day/60-day political windows, a candidate for *federal* office must comply with the disclosure requirements described above in Section 3.

Section 22  
**ORDERING DEADLINES**

**ORDERING/NAB FORM/PAYMENT DEADLINES**

**CANDIDATES ORDERING / NAB FORM DEADLINES**

All schedules must be delivered to WKCF-TV. Orders may be e-mailed, sent via “e-port”, delivered in person, or faxed to the station’s political advertising specialist. Orders must be received prior to the deadlines stated below. Orders received after these deadlines will start the following day. This does not apply to holiday log schedules.

<u>TO AIR ON</u>	<u>DEADLINE</u>
MONDAY	BY 12:00 PM PRECEDING FRIDAY
TUESDAY	BY 12:00 PM PRECEDING MONDAY
WEDNESDAY	BY 12:00 PM PRECEDING TUESDAY
THURSDAY	BY 12:00 PM PRECEDING WEDNESDAY
FRIDAY	BY 12:00 PM PRECEDING THURSDAY
SATURDAY	BY 12:00 PM PRECEDING FRIDAY
SUNDAY	BY 12:00 PM PRECEDING FRIDAY

**CANDIDATES COPY / TRAFFIC INSTRUCTIONS / PAYMENT DEADLINES**

<u>TO AIR ON</u>	<u>DEADLINE</u>
MONDAY	BY 3:00 PM PRECEDING FRIDAY
TUESDAY	BY 3:00 PM PRECEDING MONDAY
WEDNESDAY	BY 3:00 PM PRECEDING TUESDAY
THURSDAY	BY 3:00 PM PRECEDING
FRIDAY	BY 3:00 PM PRECEDING THURSDAY
SATURDAY	BY 12:00 PM PRECEDING FRIDAY

**SUNDAY**

**BY 3:00 PM PRECEDING FRIDA**

**NON-CANDIDATE (ISSUE) ORDERING / NAB FORMS / PAYMENT  
DEADLINES**

All schedules must be delivered to WKCF-TV. Orders may be e-mailed, sent via “e-port”, delivered in person, or faxed to the station’s political advertising specialist. Orders must be received prior to the deadlines stated below. Orders received after these deadlines will start the following day. This does not apply to holiday log schedules.

**TO AIR ON**

**DEADLINE**

**MONDAY**

**BY 12:00 PM PRECEDING FRIDAY**

**TUESDAY**

**BY 12:00 PM PRECEDING MONDAY**

**WEDNESDAY**

**BY 12:00 PM PRECEDING TUESDAY**

**THURSDAY**

**BY 12:00 PM PRECEDING WEDNESDAY**

**FRIDAY**

**BY 12:00 PM PRECEDING THURSDAY**

**SATURDAY**

**BY 10:00 AM PRECEDING FRIDAY**

**SUNDAY**

**BY 12:00 PM PRECEDING FRIDAY**

**NON-CANDIDATE (ISSUE) COPY / SCRIPT & BACK UP / TRAFFIC INSTRUCTION  
DEADLINES**

**TO AIR ON**

**DEADLINE**

**MONDAY**

**BY 1:00 PM PRECEDING FRIDAY**

**TUESDAY**

**BY 1:00 PM PRECEDING MONDAY**

**WEDNESDAY**

**BY 1:00 PM PRECEDING TUESDAY**

**THURSDAY**

**BY 1:00 PM PRECEDING**

**FRIDAY**

**BY 1:00 PM PRECEDING THURSDAY**

**SATURDAY**

**BY 10:00 AM PRECEDING FRIDAY**

**SUNDAY**

**BY 1:00 PM PRECEDING FRIDAY**

These ordering deadlines are designed to ensure that WKCF-TV has adequate time to process orders in the event we receive an inordinately large volume of orders on any given day. Creating advertiser profiles, correctly inputting orders, approval of orders, processing orders in traffic and log editing all take a considerable amount of time.

Orders that are received after the above deadlines may not be processed in time for the desired start date. WKCF-TV will make every effort to process orders that are received after the above deadlines but cannot guarantee they will air in compliance with the deadlines stated. Any order that is sent to WKCF-TV after these deadlines will be discussed with the advertiser and will clearly communicate our ability or lack thereof to meet the desired start date.

One exception to these ordering deadlines occurs in relation to ordering spots in Special Programming. This special programming could include professional sporting events/games, local sports, or news specials. WKCF-TV will make every effort to inform advertisers in advance of these specials and if spots are still available. In the event that WKCF-TV is airing one of these "One Time Only" specials and there is inventory available in the program after we print the log, WKCF-TV will allow all clients (political or otherwise) to buy a spot(s) in the program the day of airing until the program is sold out. We will require that the copy and money for this purchase be in house before the special airs. This is the only time WKCF-TV allows spots to be purchased and air on the same day.

Orders that are sent to WKCF-TV incorrectly based on the provided avails and programming by WKCF-TV will not be confirmed until the purchaser corrects the order. We will make reasonable effort to point out any inaccuracies to the purchasers as we would any regular advertiser. However, it is the responsibility of the purchaser to read and follow the provided material. These corrections need to be sent to WKCF-TV prior to stated copy deadlines. WKCF-TV will not be responsible for spots missed due to inaccurate ordering.

All political orders will be confirmed only by the receipt of the schedule, payment, material and traffic instructions and the appropriate forms or by WKCF-TV. Payment provided prior to stated deadlines to our national rep firm (HRP) will be accepted. Confirmed orders are subject to preemption until the schedule, payment, appropriate forms, material and traffic instructions for the orders are received by WKCF-TV.

#### Section 23

### **BROADCAST OF POLITICAL ADS ON ELECTION DAY**

WKCF-TV accepts political advertising on Election Day.

Section 24  
**WHO TO CONTACT**

Political advertisers interested in ordering time should contact:

**Eric Bloom**  
**National Sales Manager**  
**WKCF-TV**  
**1021 N. Wymore Road**  
**Winter Park, FL. 32789**  
**407-389-7620**  
**[ebloom@hearst.com](mailto:ebloom@hearst.com)**

Section 25  
**TAPE SPECIFICATIONS**

To be compatible with the Station's broadcast equipment, your commercial must be sent as a digital file. This can be done through electronic delivery via our FTP site or through an email link.

It is important that the rules for the creation of the file are followed, specifically, the MPEG-2 type from our specs:

**Standard Definition:**

File Wrapper: MPEG-2 Layer 1

Video Resolution: 720 X 480i, 29.97 frames/second, 16x9 aspect ratio

Compression Codec: MPEG2 [4:2:0 GOP of 15]

Bitrate: 15 Mb/s 8 bit

Audio: PCM 16, 20, or 24 Bit 48 KHz sample rate

Audio Level: -24 LKFS (-24 full scale digital, more or less 2 units)

**High Definition:**

File Wrapper: MPEG-2 Layer 1

Video Resolution: 1920 X 1080i, 29.97 frames/second, 16:9 aspect ratio

Compression Codec: MPEG2 [4:2:0 GOP of 15]

Bitrate: 35 Mb/s 8 bit

Audio: PCM 16, 20, or 24 Bit 48 KHz sample rate

Audio Level: -24 LKFS (-24 full scale digital, more or less 2 units)

\*\*(HD commercials are 'center cut' when down-converted on our SD feed. Please make sure that graphics, titles, and characters will not be cut-off on the left and right sides.)

**Content formatting:**

Slate duration = 01 seconds 29 frames

Black duration = 01 seconds 29 frames

60 second duration = 59 seconds 29 frames

30 second duration = 29 seconds 29 frames

15 second duration = 14 seconds 29 frames

10 second duration = 09 seconds 29 frames

Section 26  
**TRAFFIC INSTRUCTION DELIVERY**

Electronic files should be uploaded to:

FTP site: <ftp://64.178.175.55/>

Username: commercial

Password: spot

Once uploaded, you must notify us via email that the file has been sent:

[HearstOrlandoTraffic@hearst.com](mailto:HearstOrlandoTraffic@hearst.com)

All traffic instructions must be sent by email (preferred) or fax to:

Tina Rogers  
1021 N. Wymore Road  
Winter Park, Fl. 32789  
Telephone: (407)-389-7642  
Fax: (407)-389-7647  
[HearstOrlandoTraffic@hearst.com](mailto:HearstOrlandoTraffic@hearst.com)

Section 27  
**PAYMENT AND CREDIT POLICY**

WKCF-TV requires political advertisers to pay for advertising in advance by the deadlines listed in Section 22. Two forms of payment are accepted: check (certified or bank) or wire transfer. WKCF-TV does not accept credit cards payments for political advertisers. Checks should be made payable to WKCF-TV. To ensure timely receipt of payment by check, please send payment to the attention of:

**Eric Bloom**  
**National Sales Manager**  
**WKCF-TV**  
**1021 N. Wymore Road**  
**Winter Park, FL. 32789**  
**407-389-7620**  
**[ebloom@hearst.com](mailto:ebloom@hearst.com)**

Section 28  
**STATION'S RIGHT TO RECAPTURE TIME**

We reserve the right to cancel or adjust the amount of time sold on WKCF-TV to accommodate special program or advertising preemptions, or because of technical difficulties or labor disputes, or for other reasons beyond the control of WKCF-TV, or where necessary to enable WKCF-TV, pursuant to the Communications Act of 1934, as amended, to satisfy the "equal opportunity" requirements of all legally qualified political candidates and the "reasonable access" requirements of all legally qualified federal political candidates. Where such cancellations or modifications are necessary, advertisers will be advised and rebates, credits, schedule changes or other adjustments will be made as may be appropriate.

Section 29  
**DISCLOSURE STATEMENT IS 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 which this Station, in good faith, attempts to follow in connection with the sale and placement of political broadcast advertising. The terms of any actual sale of time are contained in our sale contract and none of the matters contained in this Disclosure Statement are incorporated by reference in the sale contract.

Section 30  
**EKCF-TV (The Justice Network)**

EKCF-TV (The Justice Network) is a digital television station operated by WKCF-TV with content provided by both The Justice Network and WKCF-TV. A separate current rate card for EKCF-TV will be provided with all WKCF-TV material. All sections above in this disclosure statement apply to EKCF-TV.

Section 31  
**NON-DISCRIMINATION IN THE SALE OF ADVERTISING TIME**

This Station does not discriminate in the sale of advertising time, and we will accept no advertising which is placed with an intent to discriminate on the basis of race or ethnicity. Advertisers and agencies should not purchase broadcast air time on this Station for a discriminatory purpose, including but not limited to decisions not to place advertising on particular stations on the basis of race or ethnicity. WKCF-TV expects advertisers and agencies, at the time of purchase, to represent and warrant that their purchase complies with this non-discrimination provision.

Section 32  
**FURTHER INFORMATION**

We will be pleased to provide, upon request, further information about our rates, advertising policies, advertising packages, and advertising plans. We encourage prospective political advertisers to inquire. It is our desire to furnish all appropriate information to those interested in purchasing political advertising on WKCF-TV to assist you in communicating your message within our service area.

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