

## STATION POLITICAL DISCLOSURE STATEMENT

Reno Media Group, KLCA will provide reasonable access to its broadcast facilities for political advertising by legally qualified federal candidates. However, we reserve the right to determine the non-federal candidates to whom we will sell time. Once time is sold to a federal or non-federal candidate, equal opportunity rights are afforded to all legally qualified opponents of that candidate. Where doubt exists, KLCA may require satisfactory proof that the candidate is "legally qualified" as that term is defined by the FCC. Advertising orders for all candidates must be received in writing and signed by the person making the purchase. If an advertising agency is involved, the advertiser should furnish a statement by the candidate or candidate's committee authorizing the agency to purchase advertising on the candidate's behalf.

Most rates for commercial advertising time sold on KLCA are arrived at on an individually negotiated basis. Individually negotiated spot packages are equally available for purchase by political candidates. Negotiated buys may, for example, include spots in a number of different rotations or day-parts and combinations of different classes of spots. A description of various classes of advertising time offered to commercial advertisers is provided below. Rates for most classes of time vary on a weekly basis, based upon supply and demand. During the 45-day period before a caucus, primary or primary or run-off election, and the 60-day period prior to a general election, the ultimate charge provided to eligible political candidates and their authorized committees purchasing spots for "uses" – that is, spots purchased on behalf of a candidate containing a positive appearance by a candidate in which the candidate's voice or likeness is readily identifiable – will in no event exceed the lowest price paid by any other advertiser for a spot of the same class and length and for the same daypart or rotation which actually run during the same rate period as the political spots. A legally qualified federal candidate will be eligible to receive the lowest unit rate only if the candidate provides to KLCA the written certification required under Section 305 of the Bipartisan Campaign Finance Reform Act of 2002 ("BCRA"), and adheres to that certification throughout the campaign. At times other than the 45 and 60 day pre-election periods, candidates will be charged rates comparable to those charged to commercial advertisers, and will receive the same opportunities to negotiate individual packages that commercial advertisers receive. Lowest unit rate policies do not apply to "soft money" announcements (including announcements sponsored by a political party but which are not "uses" and not endorsed by the candidate), announcements sponsored by a third party, or to any form of "issue" advertising.

Eligible candidates will receive all discount privileges available to commercial advertisers, and will be provided with any rebates for overcharges, before the election when possible. The applicable rates for specific classes of time and rotations in which a candidate is interested will be provided upon request to Jill Gover at Reno Media Group, 961 Matley Lane, Suite 120, Reno NV 89502, 775-829-1964 ext 233. The precise lowest unit rate may not be determined until after particular spots have aired. Lowest unit rates provided to eligible candidates in advance represent KLCA's best good faith estimate of such rates, although the final rates may vary, in which event rebates will be provided if appropriate.

## Classes of Time

Immediately preemptible spots aired during specific rotations. These spots are not guaranteed to run, and may be preempted without notice. These spots are sold to commercial advertisers with the understanding that they will run, unless the station sells out its inventory in a particular rotation or day-part. Accordingly, the probability of clearance varies constantly based on supply and demand. Whether a spot will be preempted depends on the price of a spot, length of a flight, and make-up of the schedule purchased. KLCA sells immediately preemptible spots for the following day-parts and rotations:

Monday – Friday 6:00am-10am	Sat 7pm-12 Midnight
Monday – Friday 10a-3pm	Sun 6am-10am
Monday – Friday 3pm-7pm	Sun 10am-3pm
Monday – Friday 7pm-Midnight	Sun 3pm-7pm
Sat 6am-10am	Sun 7pm-12 Midnight
Sat 10 am-3pm	Mon-Fri 6am-7pm
Sat 3pm-7pm	

Advertisers may also purchase spots within particular programs. Immediately preemptible rates for these day-parts and for particular programs are subject to change on a daily basis, based upon supply and demand. During lowest unit charge periods, political candidates will be provided with the lowest rates for immediately preemptible spots for the specific day-parts and rotations which candidates purchase. At other times, candidates will be provided with the lowest rates comparable to those received by commercial advertisers for immediately preemptible spots for rotations and day-parts which candidates purchase. because rates and clearance probabilities for these spots change frequently, candidates should contact us to receive the current rates when placing a buy. Candidates will receive treatment comparable to that received by commercial advertisers with respect to preemption.

Non-preemptible spots. Commercial clients often refer to this class of time as "fixed rate". Candidates may purchase spots in this class of time and be guaranteed that the commercials will air as ordered except for technical problems reasonably outside the control of KLCA (machine failures, power outages, sports over-runs, etc.) or acts of God. During time when the available supply of commercial time is exceeded by demand for commercial time, spots purchased at these rates will preempt spots purchased at the preemptible rates even if the preemptible rate is higher than the non-preemptible rate.

1. Package Plans. KLCA offers individually negotiated packages that may include, for example, combinations of spots in various day-parts, bonus and discount and/or ROS spots. Sponsorship packages which would imply a relationship between the station and a candidate are not available to political candidates. In addition, non-cash incentives of *de minimis* value or which would imply a relationship between the station and a candidate, which may be available in some package plans, are not available to candidates. All other packages that are made available to commercial advertisers are available to political candidates. However, the lowest unit rate for all day-parts and rotations is calculated to reflect all package discounts to ensure that eligible

political candidates receive the lowest unit rates for all spots scheduled to air during lowest unit charge periods regardless of whether they buy an entire package.

2. Make Goods. KLCA will make every effort to provide "make-good" spots prior to the election for spots purchased by eligible political candidates that are in fact preempted because of unforeseen program changes or technical difficulties. Although the station's policy is to offer all eligible political candidates make-goods prior to the election, we cannot guarantee to any advertiser that the make-goods can be provided during the day-part or rotation originally purchased. If that is not possible because of inventory constraints, the station will offer make-goods of equivalent value. If these are not acceptable to an advertiser, the station will provide credits or refunds for preempted spots.

3. Newscasts. Sponsorships of KLCA newscasts, traffic or weather reports and spots within newscasts are not available to political candidates.

4. Available Spot Lengths. Typically, KLCA sells 30 Second and 60 Second spots. There is a rate distinction made between 30 second and 60 second spots. The 30 second spots are 80% of the 60% rate. Prices for spots of lengths longer than 30 second and 60 seconds may be individually negotiated.

5. Sponsorship Identification. All spots must comply with the sponsorship identification requirements of Section 317 of the Communications Act and Section 311 of BRCA. If spots do not contain the identification required under the Communications act, we reserve the right to add appropriate identification (which may require deletion of some part of the existing commercial) and to bill the candidate for any production costs incurred by the station.

6. Rebates. If we sell advertising time to an eligible political candidate for a "use" during the prescribed "lowest unit rate" periods for a particular amount and class of time at a rate in excess of the rate charged another advertiser for the same amount and class of time in the same time period which clears as scheduled, the stations will afford the candidate the benefit of the lower rate by means of a rebate, a refund against future purchases, or a refund for the difference, as determined by the candidate. No adjustments will be made for purchases not subject to the "lowest unit rate" requirements.

7. Value Added Features. If scheduled during the prescribed lowest unit rate periods, eligible political candidates may purchase spots with value added elements in conjunction with air time on the same terms as offered to commercial advertisers, including non-cash promotional incentives, unless the nature of the promotional incentive is *de minimis* (such as coffee mugs or other five away items\_ or might imply an endorsement by or other relationship with the station, in which case such promotional features are not available to political candidates. "Billboard" or program sponsorship arrangements are not available to political advertisers. Details will be provided upon request.

8. Audience Delivery. At the request of some commercial advertisers, we sell time on the basis of Arbitron audience evaluations. Because ant bonus spots necessary to provide additional audience delivery may not be determined with certainty by the end of any election period,

requests to purchase time on this basis on behalf of a legally qualified candidate must be directed to the general sales manager.

9. Credit practices. We require all new advertisers and all advertisers in volatile businesses or those whose operations are intermittent or of limited duration, including political candidates, to pay for all spots in the form of a certified or cashier's check, money order, wire transfer, or cash in the full net amount of the schedule being ordered in advance of the schedules commencement. All payments must be received by STATION no later than 48 hours prior to air date.

10. Receipt of Materials. All tapes must be received by the KLCA Traffic Department no later than 24 hours prior to air date. Tapes for Schedules commencing on Saturday, Sunday or Monday must be received no later than noon on the Friday prior to air date. KLCA cannot guarantee make-goods for schedules which do not air due to a delay in receipt of tapes.

11. Receipt of Documents. The station must have received all properly completed documents prior to broadcasting a scheduled advertisement, including:

- All Political advertisers must sign certification associated with this policy statement to acknowledge receipt and understanding of KLCA's political advertising policies.
- The political Advertising form.
- A list of the entities' chief executive officers, executive committee or board of directors, where the purchase is made by a corporation, committee, association or other unincorporated group.
- For federal candidates, the certification required by BRCA

#### Policy Acknowledgement

I, \_\_\_\_\_, am an authorized member of \_\_\_\_\_, who is placing political advertising with KLCA. In that capacity, I acknowledge receipt and understanding of KLCA's political policy statement.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date