

RADIO WYOMING STATIONS

(Casper Radio Group, Brahmin Broadcasting, Appaloosa Broadcasting, White Park Broadcasting, Jackson Radio Group)
STATEMENT OF POLICY ON POLITICAL ADVERTISING

This Statement of Policy on Political Advertising sets forth the guidelines and policies which will govern the acceptance of political advertising by our stations and the rates that will be charged for such advertising.

It is the intention of station to comply fully with all applicable laws and regulations relating to the use of this station by legally qualified candidates for public office. Our policies regarding political broadcasting are designed to meet all legal requirements. However, to the extent permitted by law, station reserves the right to modify this policy at any time.

This policy is provided for general information, and is not intended to be a part of any advertising contract. Any advertising contract is governed by law and by its own terms.

GENERAL POLICY. In order for a commercial advertisement (including those in program-length format) to qualify as a “political advertisement,” and for it to be treated as set forth in this Statement, the announcement must contain a “use” by a “legally qualified candidate” in connection with the candidate’s campaign. Advertisements which do not constitute a “use,” or which are not on behalf of a “legally qualified candidate,” will be treated as standard, non-political advertisements, and will be accepted or rejected by the station at its normal rates within the discretion of station management.

To qualify as a “use,” the advertisement must contain the recognizable voice of the candidate. This need not be in the editorial portion of the advertisement; the appearance of the identified or identifiable voice of the candidate during the requisite sponsorship identification portion of the advertisement is sufficient.

To be a “legally qualified candidate,” the candidate must have publicly announced his or her intention to run for nomination or office, be qualified under the applicable local, state or federal law to hold the office for which he or she is a candidate, and either be on the ballot or have made the appropriate substantial showing that they are bona fide candidates for election or nomination.

The appearance of a candidate in a non-election related advertisement, such as for a product or service, is not in connection with the candidate’s campaign. While such appearance may give rise to equal opportunity obligations, it is not a “political advertisement” within the scope of this Statement.

While station does not offer *free* time for political advertising, during the 2016 campaign the station exercised its editorial discretion to offer the candidates for certain positions the opportunity to appear on station in a manner that is exempt from equal opportunities requirements. The station reserves the right to continue to do so within its discretion.

CANDIDATES FOR FEDERAL OFFICE. We afford legally qualified candidates for federal elective office reasonable access by permitting the purchase of reasonable amounts of time for the use of the candidate over the facilities of station. We have no predetermined limitations on the total amount of time a federal candidate may purchase or on the time of day in which his/her announcements may appear. Instead, we intend

to consider individually the needs of each federal candidate in an effort to meet his or her needs. In determining what constitutes “reasonable” access, we consider such factors as the amount of time the candidate has already purchased and/or used, the total number of candidates in the race who are likely to buy time, the overall demand for political advertising on our station, and any potential programming disruption that might be caused by a candidate’s requested schedule.

STATE AND LOCAL RACES. It is the policy of station to keep its listeners informed of opposing candidates' viewpoints in significant state and local elections. Generally, station also sells air time to legally qualified candidates for non-federal public office in such elections. Because of the size of the station listening area, and the number of state and local elections that regularly take place therein, station exercises discretion to determine whether to accept advertising for a particular race, whether to limit the sale of time to state and local candidates to certain programs or day parts, as well as the amount of advertising that it will sell to state and local candidates for such offices. Some of the factors we consider in making these decisions include the number and importance of state and local races, the constraints imposed by station's obligation to afford reasonable access to federal candidates, the availability of inventory, and the potential programming disruption.

RATES FOR CANDIDATES. During the “statutory period,” the charges for use of station by legally qualified candidates running in that election are not, under federal law, permitted to exceed the lowest unit charge of station for the same class and length of announcement for the same time period. The “statutory period” is the 45-day period preceding a primary or primary run-off election and the 60 day period preceding a general or special election. Whether a candidate is entitled to the lowest unit charge for a particular announcement depends on the date the spot airs -- not when the order is accepted. Thus, to qualify for lowest unit rate treatment, the announcement must be a use, must be for a legally qualified candidate, and must actually air during the statutory period. At times when the lowest unit charge is not applicable, the charges for use of station by legally qualified candidates may not exceed the charges made for comparable use of station by other advertisers.

Because the prices of spots on station are subject to change, the lowest unit charge for a particular length of spot, class of spot and time period may also vary during the 45 or 60-day pre-election periods.

An advertisement must be placed by or on behalf of the candidate or his official campaign committee, or by the political party supporting the candidate’s nomination or election, in order to qualify for lowest unit rate treatment. Lowest unit charge does not apply to third party or independent expenditure advertising, even if the advertisement constitutes a “use.” The “use” must be sponsored by the candidate to qualify for lowest unit charge.

In the event any legally qualified political candidate is charged in excess of the applicable lowest unit charge, or the comparable use rate, whichever is applicable, whether because of a post-order change in the applicable lowest unit charge or for any other reason, station will rebate the excess payment to the candidate, or credit that amount toward a future time purchase should the candidate so desire. While station will endeavor to give the candidate a choice of such a rebate or “make-good” prior to the election date the station cannot guarantee that it will be able to notify the candidate, or make good any charges in excess of the legal rate, prior to the date of the election because of the volume of political and non-political advertising placed on station.

TYPES OF ADVERTISING SCHEDULES. We are pleased to work with candidates and their representatives to ensure that the candidate is aware of and is able to make any purchase of time available to commercial advertisers, according to the schedule the candidate believes would be most advantageous. It is our

policy to assist candidates in making informed judgments as to their time purchases by alerting them to the full range of options available.

Advertising on station varies by two major factors: length of the advertisement and the daypart in which it will air. The following information is intended to inform candidates as to the various types of purchases station's advertisers typically make:

Length of Advertisements. Station primarily sells time in durations of either 30 or 60 seconds. Station will make other lengths of time available to candidates for federal office if station has offered such lengths to commercial advertisers during the statutory period. Thus, federal candidates should inquire as to the availability and price of program length political advertisements in lengths equivalent to programs broadcast by station during the past year.

Fixed. These spots are guaranteed to air on the day or days and within the specific time-period purchased. These spots will not be preempted or moved in favor of other, more expensive spots, and will air as scheduled except in the event of unforeseen program changes or technical difficulties. This is the station's highest priced class of time. The likelihood of a spot not running is less than one percent.

Pre-emptible with Notice: During the statutory period, we forecast that spots booked in this class of time will typically clear at a minimum of 65%. In the event of a preemption, we will immediately (within one business day) notify the candidate and offer a make good. In our make good offer process, we will endeavor to first try to place the preempted spot back in the same time period within the same broadcast week. However, in high oversell circumstances, Station may do one of the following: 1) offer a comparable make good in another time period, 2) offer a make good in a subsequent week to the one originally ordered, but before the election, or 3) offer the candidate a "bump" rate (a rate that is high enough to bump the next lowest unit rate spot out and replace it) that will be sufficient to work the preempted spot back in.

Standard dayparts. Station provides advertising in various time periods ("dayparts"). Station sells time in the following daypart blocks: 6:00 a.m. to 10:00 a.m. (Morning Drive); 10:00 a.m. to 3:00 p.m. (Midday); 3:00 to 7:00 p.m. (Afternoon Drive); 7:00 p.m. to 12:00 midnight (Evening); These spots are guaranteed to air within the daypart purchased, except in the event of unforeseen program changes or technical difficulties. The Jackson Radio Group does permit candidate sponsorship of newscasts. The station retains the discretion to air these advertisements at any time within the daypart purchased.

Current rate information for all of the lengths and advertisement positioning offered by station is provided to each person who requests information regarding political advertising on station. In addition to the current "going rates," the station also will provide its best, good faith estimate of the lowest unit rates upon any request for information. Because so many options are available, it is impossible to provide a comprehensive and understandable rate sheet. Typically, Station's "going" rates are similar or identical to the class of time identified as "Preemptible With Notice" However, the rate sheet does not reflect all options available to political candidates, and the candidate or his or her representative should request information from station as to any specific form of advertising under consideration. Consistent with the policies set forth in this Statement, the station is committed to meeting the needs of all qualified political advertisers.

Make Goods. Make good privileges are outlined and defined within each class of time. Station endeavors to make all spots good whenever possible. The exception is when Station has an oversell situation and there is more demand than inventory supply. In this instance, make good privileges are prioritized by Station's three classes of time. In an oversell situation, candidates and advertisers who purchase in the "Fixed" class of time are granted highest priority, then "Pre-emptible With Notice". Station cannot guarantee, however, that time sensitive make goods can be provided in the time period or rotation originally ordered. If inventory constraints make identical scheduling impossible, station will offer make goods of equivalent value. If these are not acceptable to the candidate, station will provide credits or refunds for preempted spots.

Station accepts political advertising on election day.

PREREQUISITES TO BROADCAST. For each political time order, a signed station political broadcast form must be at station or station's representative's office at the time a political order is placed, and preferably at least 72 hours prior to broadcast. Copies of the current form are available upon request.

Commercial copy, along with written traffic instructions, should be submitted to the station as soon as possible to ensure proper airing and compliance with sponsorship identification requirements. All traffic instructions for airing of commercials must be in writing. The candidate is responsible for delivery of all advertisements to station. Station reserves the right to request information to demonstrate that persons purchasing time for a candidate are authorized to do so; in no event, however, will station deny reasonable access to a federal candidate on such grounds.

SPONSORSHIP IDENTIFICATION. Under the rules of the Federal Communications Commission and the Federal Election Commission, a sponsorship identification announcement must be given revealing who paid for or sponsored an announcement or program. Candidates and their committees (or an outside party paying for the broadcast) must disclose the true identity of the person or entity by whom or on whose behalf payment is made. If an outside party is involved, the identification must state whether the announcement was authorized by a candidate or his/her committee. *If a political announcement does not contain proper sponsorship identification, the station is required to insert the required sponsorship identification before allowing the spot to air. Since all advertisements must be limited to the amount of time purchased, spots lacking the required identification may be partially overdubbed.*

PREPAYMENT AND CREDIT. All political orders, whether direct from the candidate or through a recognized advertising agency, require pre-payment to station. If payment is not received, station will cancel any spots not paid for at least one working day prior to their scheduled broadcast

PRODUCTION FACILITIES. Station will make its production facilities available to candidates and their representatives. All inquiries or requests concerning production time and facilities should be made through your sales representative.

POLITICAL FILE. We maintain a political file of all requests for broadcast time made by or on behalf of candidates for public office, together with materials showing the disposition made by station of each such request, any charges made if the request was granted, and the lengths, classes, and dayparts purchased. The political file is available for public inspection during regular business hours at station's main studio. Our regular business hours are 8:30 a.m. to 5:00 p.m., Monday through Friday. We retain the records in our political file for a period of three years. If you have any questions about our political file, please do not hesitate to ask.

LIST OF OFFICERS AND DIRECTORS REQUIRED. Station requires a committee, association, or group that is purchasing political advertising to furnish station with a list of its chief executive officers, members of its executive committee, or members of its board of directors. Such lists must be furnished before station will grant a request for time. These lists will be available for public inspection at station's main studio during regular business hours. These records will be retained in the political file for three years.

PLACING ORDERS. Please call (307) 232-2155 to place advertising on station:

If you make a written request prior to the weekend immediately preceding an election, station will provide you the name and phone number of a station contact, through whom you may make requests for additional advertising or copy changes during that weekend. Our policy is only to make copy changes on the weekend before the election.

This is to acknowledge receipt of the
Radio Wyoming Stations
"2016 Political Advertising Policies"

I have received and reviewed these policies on behalf of:

Name of Candidate and Office Sought

Signature/Title

Date