



Federal Communications Commission
Washington, D.C. 20554

April 27, 2018

DA 18-429

Released: April 27, 2018

HSH Charleston Licensee, LLC
201 Massachusetts Avenue, NE
Suite C-1
Washington, DC 20001

Colby M. May, Esq.,
7010 Little River Turnpike
Suite 440
Annandale, VA 22003.

Re: WGWG-TV, Charleston, SC
Facility ID: 21536
File No. BRCDT-20120731AFC
FRN: 002390803

Dear Licensee:

This letter is in reference to the above captioned license renewal application filed by HSH Charleston Licensee, LLC (Licensee), licensee of full-power station WGWG-TV, Charleston, South Carolina (Station). We hereby admonish the Licensee for its failure to prepare the Station's Lists in accordance with Section 73.3526(e)(11)(i) of the Commission's rules (Rules).¹

Section 73.3526 of the Rules requires each commercial broadcast licensee to maintain a public inspection file containing specific types of information related to station operations.² In relevant part, Section 73.3526(e)(11)(i) of the Rules requires every commercial television licensee to maintain a list of programs "that have provided the station's most significant treatment of community issues during the preceding three month period" and must provide "a brief narrative describing what issues were given significant treatment and the programming that provided this treatment."³ Specifically, these narratives must include, at minimum, "the time, date, duration, and title of each program in which the issue was treated."⁴ TV issues/programs lists must be placed in the Station's online public file by the tenth day of the succeeding calendar quarter and copies must be retained until final action has been taken on the station's next license renewal application.⁵

¹ 47 CFR § 73.3526(e)(11)(i).

² 47 CFR § 73.3526.

³ 47 CFR § 73.3526(e)(11)(i).

⁴ *Id.*

⁵ *See id.*; 47 C.F.R. § 73.3526(b)(2). Broadcasters were required to begin placing public file documents in their online public file, with limited exception, on August 2, 2012. *See Effective Date Announced for Online Publication of Broadcast Television Public Inspection Files*, Public Notice, 27 FCC Rcd 7478 (2012).

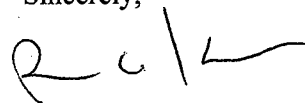
A staff review of the Licensee's online public inspection file revealed that the Licensee, since acquiring the Station on February 27, 2015,⁶ failed to include in its TV issues/programs lists all of the necessary information required by Section 73.3526(e)(11)(i) of the Rules. While the all of the Station's TV issues/programs lists were placed in the Station's online public file in a timely manner, the lists from the second quarter of 2015 to the second quarter of 2017 omitted information required by Section 73.3526(e)(11)(i) of the Rules. On September 29, 2017, the Licensee amended all of its previously submitted TV issues/programs lists in order to comply with the substantive requirements of the Section 73.3526(e)(11)(i).

Although we conclude that the Licensee violated Section 73.3526(e)(11)(i) of the Rules, we find that admonition is appropriate sanction at this time. While the Licensee took actions to fix and prevent future violations, this does not relieve it from liability for violations that have already occurred.⁷ We do not rule out more severe sanctions for violations of a similar nature in the future. We also remind the Licensee that the Commission expects all television licensees to comply with the Commission's public inspection file rules, which includes providing all of the necessary information required by the Rules in the Station's TV issues/programs lists.

Accordingly, **IT IS ORDERED**, pursuant to Section 4(i) of the Communications Act of 1934, as amended,⁸ and Sections 0.61 and 0.283 of the Commission's rules,⁹ that HSH Charleston Licensee, LLC **IS ADMONISHED** for violating Section 73.3576(e)(11)(i) of the Rules.¹⁰

IT IS FURTHER ORDERED that a copy of this Letter shall be sent by First Class and Certified Mail, to the licensee and its counsel at the addresses listed above.

Sincerely,



Barbara A. Kreisman
Chief, Video Division
Media Bureau

⁶ See File No. BALCDT-20140910ADE (granted Dec. 4, 2014; consummated Feb. 27, 2015).

⁷ See *International Broadcasting Corp.*, Memorandum Opinion and Order, 19 FCC 2d 793, 794 (1969) (permitting mitigation as an excuse based upon corrective action following a violation would "tend to encourage remedial rather than preventive action").

⁸ 47 U.S.C. § 154(i).

⁹ 47 CFR §§ 0.61, 0.283.

¹⁰ 47 CFR § 73.3526(e)(11)(i).