WCLY-AM
Raleigh, North Carolina
POLITICAL ADVERTISING DISCLOSURE STATEMENT
2016

The policies in this Political Advertising Disclosure Statement ("Disclosure Statement") apply only to legally qualified candidates for public office, or their authorized campaign organizations, who seek to purchase political advertisements on radio station WCLY-AM (the "station"). The policies are not applicable to political action committees or to non-candidate "issue" advertising. The purpose of this Disclosure Statement is to explain WCLY-AM's political advertising policies and procedures, including application of the "lowest unit charge" provisions of Section 315(b) of the Communications Act, as amended (the "Act"), and the sponsorship identification provisions found in Section 317 of the Act and Section 441d of the Federal Election Campaign Act. This document does not constitute an offer to sell time nor is it a contract; rather, it is a statement of the policies that this station in good faith, attempts to follow in connection with the sale and placement of political advertising. The terms of any actual sale of time are contained in our sale contracts and none of the matters contained in this disclosure statement are incorporated by reference in the sale contract. For more information, please contact Brian Grube, Local and National Sales Manager at (919) 890-6143, 3100 Highwoods Blvd, Ste. 140., Raleigh, NC 27604.

The station will provide reasonable access to all candidates for federal office prior to each primary or general election involving such candidate. While candidates may request specific programming, the station reserves the right to determine program availability while still affording reasonable access. Generally, the station also sells airtime to legally qualified candidates for non-federal public office. However, the station reserves the right to determine the amount of advertising that it will sell to state and local candidates. The station may choose not to sell time at all for certain state and local races, or to limit the sale of time to state and local candidates to certain programs or dayparts.

Orders for Political Time

Orders for political time will not be considered firm until the appropriate certifications and purchase request forms (see attached) have been delivered and, if the candidate is without an established credit history for prompt payment, the net cash payment has been received at least one week in advance of the air date of the first spot in the schedule. All orders for political time must include a completed and signed Agreement Form for Political Broadcasts (NAB Form PB-18 Candidates). Advertising agencies must provide the station with a signed statement from the candidate authorizing the agency to purchase time on the candidate's behalf. Checks should be made payable to ***WCLY-AM***. **The station does NOT accept advertisements during news programming.**

Acceptable Forms of Payment

Acceptable forms of payment include cash, check and direct bank transfer, debit and credit cards.

Lowest Unit Charge

During the 45 days preceding a primary or run-off election and the 60 days preceding a general or special election (the "Election Periods"), candidates are entitled to receive all discount privileges otherwise offered to commercial advertisers and are to be placed on a par with the most favored commercial advertiser of this station. That is, during the Election Period, candidates will be charged the "lowest unit charge" (the "LUC") for the same class and amount of time for the same period. At times other than the Election Periods (the "Comparable Rate Period"), candidates may purchase time at rates comparable to those charged commercial advertisers.

The lowest unit charge provisions apply only during Election Periods to "legally qualified" candidates for public office or their authorized campaign organizations to promote their candidacy; they are not applicable to political action committees nor to non-candidate issue advertising. When requested, satisfactory proof must be provided to the station that the candidate is "legally qualified," as that term is defined by the Federal Communications Commission and/or that the purchaser is authorized to buy time for the candidate.

At times other than the prescribed Election Periods, the rates charged candidates shall not exceed the charges made for comparable uses of the station by other advertisers.

In the event we determine after the fact that a legally qualified candidate has been sold advertising at a rate higher than our LUC in that class of time, we shall provide appropriate refunds or credits as promptly as possible.

Federal Candidate Eligibility for Lowest Unit Charge and Certification

To qualify for the station's lowest unit charge ("LUC"), federal candidates, or their authorized committees, must certify in writing, at the time programming is purchased, that the programming does not refer to another candidate for the same office, or if the programming does refer to an opposing candidate, they must certify in writing that the programming meets the following requirements:

> The radio broadcast must include an audio statement, voices by the candidate identifying him or herself, the office being sought, and the candidate has approved the broadcast.

Candidates must make this certification in the form of the "Federal Candidate Certificate for Radio Advertising" attached hereto. Failure to adhere to this sponsorship identification disclosure means the candidate forfeits **all** rights to the LUC for **all** programming aired during the remainder of the Election Period.

In addition, please see North Carolina General Statutes §163-278.39A(c) for additional state disclosure requirements.

Proper Sponsor Identification – Federal Candidate Authorized Advertisements

Political programming which advocates the election or defeat of a federal candidate or that solicits any political contributions, regardless of whether or not it refers to another candidate for the same office, must comply with the following sponsorship identification rules.

> The advertisement must include an audio statement by the candidate identifying himself or herself stating that the candidate approved the broadcast and that the candidate and or the candidate's authorized committee has paid for the broadcast. As described above, if the broadcast refers to an opposing candidate in any manner, it must also identify the office being sought in addition, North Carolina law requires the disclosure statement to be at least three (3) seconds and joint statements must disclose the name of all sponsors.

In addition, please see North Carolina General Statutes §163-278.39A(c) for additional state disclosure requirements.

Proper Sponsor Identification

All advertisements must state that the broadcast is 'sponsored, paid for or furnished by" the identified sponsor. A pre-airing submission of all ads is requested to permit the station to verify compliance with the identification requirements.

Type of Rates Offered by WCLY-AM

This Station sells commercial time in units of fifteen (15), thirty (30) or sixty (60) second increments throughout the day. *No political spots are scheduled after 6PM election day.* Rates are gross.

Type of Spots Offered by the Station

WCLY-AM offers three classes of time: 1) Rotations; 2) Run of Schedule; and

ROTATIONS

Spots are generally sold to be broadcast within specific day-parts. For example, one or more spots may be purchased to air between the hours of 6:00AM-10:00AM, the precise air time to be selected at the sole discretion of the Station. One or more spots may be purchased to air on any one or more days to be selected at the sole discretion of the Station; for example, on any three days Monday-Friday, on any two days, Monday-Sunday, or on either Saturday-Sunday. Further, one or more spots may be purchased to air during a period on any of one or more days. A rate will be quoted for virtually any period of time or series of days. Generally, the greater the flexibility the Station maintains for spot placement, the lower the rate. (There may be limits on the number of commercials that can be purchased but such limits will comply with the FCC's reasonable access requirements for Federal candidates).

RUN OF SCHEDULE

ROS spots will be placed within the period of days and daypart purchased at times selected at the discretion of the Station. During period of heavy inventory, it is most likely that ROS spots will be broadcast during the least desirable time permitted under the rotation.

Tiers Offered by the Station

WCLY-AM offers three (3) tiers of immediately preemptible time. If a spot is preempted, a make good spot will be rescheduled, if requested, and broadcast within a reasonable period of time.

Tier 1- Immediately Preemptible without Notice

Typical clearance in this tier is 25-50%. Tier 1 rates are preemptible without prior written notice from WCLY-AM.

Tier 2 – Immediately Preemptible with 12 Hours' Notice

Typical clearance in this tier is 50-80%. Tier 2 spots are preemptible with 12 hours' prior written notice from WCLY-AM.

Tier 3 – Immediately Preemptible with 24 Hours' Notice

Typical clearance in this tier is 95-100%. Tier 3 spots are preemptible with 24 hours' prior written notice from WCLY-AM.

Preemption Priority for the Same Tier

In the event our sale orders for the same tier for the same time period should exceed the station's available inventory, the station will, subject to the "reasonable access" requirements for federal candidates, establish a scheduling priority for the announcements on the following basis:

1. Outside the Election Periods during which the LUC is applicable, priority will be given to the schedule of spots purchased by the advertiser that has purchased, in the aggregate, the largest dollar volume of advertising. In the event two or more advertisers have purchased the same dollar volume, the advertiser whose order was purchased first will be afforded priority.

2. During the Election Periods during which the LUC is applicable, political advertisements qualifying for the "lowest unit charge" will be afforded scheduling parity with advertisements purchased by the station's most favored commercial advertisers. In the event the purchase orders of a commercial and political advertiser should be considered equal under these criteria, a political advertiser will be afforded priority. In the event the purchase orders of two or more political advertisers should be considered equal under these criteria, the candidate whose order was placed first will be afforded priority.

Additional Rate and Sales Information

The station's rate card sets forth the specific time periods within which spot time may be purchased. Packages are treated as volume discounts and are considered in calculating the LUC, as are bonus spots. Rates for other time periods or special programming are available upon request.

The station will supply the current selling level and the LUC for specific time periods, tier, and amounts of time upon request.

The station has calculated the predicted LUC for every tier sold on the station. The LUC in each tier may vary on a weekly basis depending upon the price of spots actually broadcast during each week. Candidates may purchase preemptible spots at a particular class' LUC or at a higher tier so as to decrease the potential for preemption. Candidates may also decrease the potential for preemption by purchasing a higher class of time.

For additional information about station rates, please contact Brian Grube, Local and National Sales Manager at (919) 890-6143.

Make Good Policy

In the event a spot is preempted, the station will notify the candidate and if requested will make good the spot through placement in a comparable time period or periods to deliver an audience comparable to the spot purchased.

Audit Of Rates Charged

At the end of each week, the station will audit the rates for all political time sold during the Election Periods to insure that the rates charged candidates reflect the actual LUC, that is, the lowest rate any advertiser paid for the same class of spot that cleared during the same time period during the given week. Refunds will be issued for any overcharges.

Product Separation

WCLY-AM endeavors to separate commercial advertisers. In cases where limited inventory and high demand dictate, we run competitors in the same commercial break.

Recapture of Spot Time Sold

The station reserves the right to recapture spot time sold to a candidate to meet equal opportunity or reasonable access requirements of the Communications Act of 1934, as amended. If spot time is recaptured by the station, the candidate will be advised as soon as practical and an appropriate refund will be issued.

Delivery of Copy

Advertisers must deliver advertising copy to Station at least two (2) days prior to the first scheduled broadcast date (MP3, DAT, CD, or DSL/Digital Website).

Waiver of Deadlines

Station reserves the right to waive its regular ordering and delivery of copy deadlines, where appropriate, to provide equal opportunity to political advertisers or to assure candidates' reasonable access.

Production Assistance

Station will provide assistance to produce political commercials or use of production facilities, if available, at no cost to the candidate. If duplicate tapes are needed for other stations, a charge of $5.00 per dub will be made.

Arrangements for use of production facilities should be made with Station's Production Director at least two (2) working days in advance. Production facilities are scheduled on a first-come, first-served basis.

Value Added Features

If scheduled during the Election Periods, candidates may purchase value-added elements offered to commercial advertisers in conjunction with spot time purchased.

Log Deadlines

Normal WCLY-AM log deadlines follow below (these deadlines will not apply during a holiday weekend or other selected weekends and will be adjusted accordingly):

Log For:	Order & Payment Deadline:
Monday	12PM Friday (of prior week)
Tuesday	12PM Monday
Wednesday	12PM Tuesday
Thursday	12PM Wednesday
Friday	12PM Thursday
Saturday	12PM Friday
Sunday	12PM Friday

No Production; Anti-Discrimination Policy

The station does not produce political advertising. Also, the station does not discriminate in the sale of advertising time and will accept no advertising which is placed with an intent to discriminate on the basis of race or ethnicity.

Further Information

We will provide, upon request, further information about our rates, advertising policies, advertising packages, rotators, and advertising plans. We encourage prospective political time buyers to inquire. It is our desire to furnish all appropriate information to those interested in purchasing political advertising on our station to enable you to make the most cost efficient and effective advertising decisions.

Contact Person; 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 time buyers to inquire. It is our desire to furnish all appropriate information to those interested in purchasing political advertising on our Station to enable you to make the most cost efficient and effective advertising decisions.

For further information, please contact:

Brian Grube, Local and National Sales Manager (919-890-6143)
WCLY-AM, 3100 Highwoods Blvd, Ste 140., Raleigh, NC 27604