

*Before the*  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

Complaint of )  
 )  
Campaign Legal Center and Sunlight )  
Foundation )  
 )  
Against )  
 )  
The Gannett Company, licensee of )  
WCNC-TV, Charlotte, NC )  
 )  
For Violations of the Communications Act )  
§ 315 and FCC Regulation § 73.1212 )

To: Enforcement Bureau

**COMPLAINT**

The Campaign Legal Center and the Sunlight Foundation file this complaint regarding violations of the Communications Act and the Federal Communications Commission’s (“FCC”) regulations by the Gannett Company licensee of WCNC-TV. In February 2014, WCNC-TV ran a political ad sponsored by Patriot Majority USA (“Patriot Majority”). The station failed to disclose information about Patriot Majority and the ad in its online political file as required by the Communications Act and the FCC’s regulations.

**I. Facts**

**A. Parties**

The Campaign Legal Center is a nonpartisan, nonprofit organization that promotes awareness and enforcement of political broadcasting laws. The Campaign Legal Center’s mission is to represent the public interest in the enforcement of media and campaign laws. Through public education, advocacy for federal rulemaking proceedings, and congressional

action, the Campaign Legal Center seeks to shape political broadcasting policies and promote effective enforcement of the public interest obligations of the media.<sup>1</sup>

The Sunlight Foundation is a nonpartisan nonprofit that advocates for open government globally and uses technology to make government more accountable to all. Sunlight accomplishes these goals at municipal, federal, and international levels by building tools that empower democratic participation and by working with policymakers and civil society organizations to employ a technology-centric and transparency-oriented approach to their work. The Sunlight Foundation has built tools that empower individuals and journalists to better and more easily understand political spending across the United States, which depend on data found within broadcast stations' political files and elsewhere.<sup>2</sup>

WCNC-TV is an NBC-affiliated broadcast station in Charlotte, North Carolina. Charlotte is the 25th largest Designated Market Area in the country, serving more than 1.1 million households.<sup>3</sup> The Gannett Company, licensee of WCNC-TV, is headquartered in Tysons Corner, VA. Gannett is a national media holding company that operates newspapers, television broadcast stations, and digital media brands.<sup>4</sup>

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<sup>1</sup> See Campaign Legal Center, [www.campaignlegalcenter.org](http://www.campaignlegalcenter.org) (last visited Apr. 2, 2014).

<sup>2</sup> For instance, Political Ad Sleuth and Ad Hawk are two such tools. See Political Ad Sleuth, <http://politicaladsleuth.com> (a searchable database created from FCC online public file documents); Ad Hawk, <http://adhawk.sunlightfoundation.com> (a mobile app allowing identification of political ads).

<sup>3</sup> *Local Television Market Universe Estimates*, The Nielsen Company, (2013), [http://www.tvb.org/media/file/TVB\\_Market\\_Profiles\\_Nielsen\\_TVHH\\_DMA\\_Ranks\\_2013-2014.pdf](http://www.tvb.org/media/file/TVB_Market_Profiles_Nielsen_TVHH_DMA_Ranks_2013-2014.pdf).

<sup>4</sup> Gannett, Our Company, <http://www.gannett.com/article/99999999/WHOWEARE/100427016> (last visited Apr. 7, 2014).

## B. The Advertisement

In March 2014, WCNC-TV broadcast a political ad sponsored by Patriot Majority. Patriot Majority is a political advocacy group and Super PAC whose mission is to “create jobs, promote economic development and preserve the American Dream for all families.”<sup>5</sup>

The Patriot Majority ad, entitled “Bad Company,” refers to Thom Tillis.<sup>6</sup> Tillis is the Speaker of the House in the North Carolina House of Representatives. He is also a 2014 Republican candidate for the U.S. Senate in North Carolina, challenging incumbent Democratic Senator Kay Hagan.<sup>7</sup> The ad, transcribed below, discusses health care reform and Medicare.<sup>8</sup>

[Narrator:] In North Carolina, we put families first. But Senate candidate Thom Tillis sides with health insurance companies. He'd let them deny coverage for pre-existing conditions, and raise rates for women needing mammograms.

Tillis supports a plan that would end Medicare as we know it and force seniors to spend up to \$1700 more for prescriptions. Thom Tillis, he's with the special interests, hurting North Carolina families.

Patriot Majority spent \$77,000 to broadcast this ad at WCNC-TV for the week of March 21, 2014, and \$500,000 in total running the ad.<sup>9</sup>

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<sup>5</sup> Patriot Majority PAC, About Us, <http://www.patriotmajority.org/about> (last visited Apr. 7, 2014).

<sup>6</sup> Exhibit A, attached, is a screenshot of the ad and a News Observer article confirming that the ad aired at stations across North Carolina in February of 2014. The ad is available at <https://www.youtube.com/watch?v=Vxi-CIzU4nA>.

<sup>7</sup> Philip Elliott, *US Chamber of Commerce throws backing to Thom Tillis in North Carolina's GOP Senate primary*, US News (Apr. 10, 2014), <http://www.usnews.com/news/politics/articles/2014/04/10/us-chamber-of-commerce-backs-tillis-in-nc-race>.

<sup>8</sup> See John Frank, *Outside Group Launches Attack Ad on Thom Tillis*, News Observer (Feb. 12, 2014), <http://www.newsobserver.com/2014/02/12/3614927/outside-group-launches-attack.html>.

<sup>9</sup> *Id.*

## II. Argument

The Patriot Majority ad triggers WCNC-TV's political file disclosure requirements in the Communications Act and the FCC's regulations. WCNC-TV, however, failed to disclose the required information.

### A. The Communications Act and the FCC's regulation requirements.

When broadcasters run political ads, they must meet specific disclosure requirements set forth in the Communications Act and the FCC's regulations.

Section 315(e)(1) of the Communications Act requires that broadcast licensees maintain records regarding any request to purchase broadcast time that “communicates a message relating to any political matter of national importance, including (i) a legally qualified candidate; (ii) any election to Federal office; or (iii) a national legislative issue of public importance.”<sup>10</sup>

For such requests, the licensee must disclose “the name of the candidate to which the communication refers and the office to which the candidate is seeking election, the election to which the communication refers, or the issue to which the communication refers (as applicable).”<sup>11</sup>

Similarly, FCC regulations require licensees to disclose information about paid broadcasts if those broadcasts concern a “political matter” or discuss a “controversial issue of public importance,” and the ad is paid for by “a corporation, committee, association or other unincorporated group, or other entity.”<sup>12</sup>

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<sup>10</sup> 47 USC § 315(e)(1)(B)(i)–(iii) (2014).

<sup>11</sup> *Id.* § 315(e)(2)(E).

<sup>12</sup> 47 CFR § 73.1212(e). *See also id.* § 73.1943. Currently, a station in the top-50 designated market areas and affiliated with a top-four network must upload its political file to the FCC's online database; however, all television stations will be required to do so beginning in July 2014. *Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Second Report and Order, 27 FCC Rcd 4535, 4536–37 (2012).

**B. The Patriot ad triggers the disclosure requirements of § 315(e)(2) of the Communications Act and § 73.1212(e) of the FCC’s regulations.**

The Patriot Majority ad run by WCNC-TV triggers the disclosure requirements of § 315(e)(2) of the Communications Act and § 73.1212(e) of the FCC’s rules for two reasons. First, the ad refers to Thom Tillis. He is a “legally qualified candidate” for the U.S. Senate in North Carolina because he maintains a public campaign website where he collects donations, issues press releases, and regularly updates campaign information.<sup>13</sup> Tillis also raised \$1.7 million for his campaign in 2013.<sup>14</sup>

Second, the ad communicates a message relating to both a “political matter of national importance” and a “controversial issue of public importance” for purposes of the Communications Act and the FCC’s regulations. The ad discusses health insurance coverage and Medicare. Health care reform is the quintessential legislative and controversial issue of public importance. It was President Obama’s key initiative and has been the subject of nationwide debate and court challenges, including at the Supreme Court.<sup>15</sup> Medicare is a national issue because it is a federal government-funded insurance plan that affects nearly 50 million Americans.<sup>16</sup> It is also a controversial issue because it is subject to nationwide debate and media coverage, and its funding has recently come under attack.<sup>17</sup>

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<sup>13</sup> See Thom Tillis, US Senate, <http://thomtillis.com/> (last visited Apr. 15, 2014).

<sup>14</sup> See Cameron Joseph, *Tillis Continues Mediocre Fundraising Pace*, The Hill (Jan. 24, 2014), <http://thehill.com/blogs/ballot-box/196395-tillis-continues-mediocre-fundraising-pace>.

<sup>15</sup> E.g., *State Laws and Actions Challenging Certain Health Reforms*, NCSL (April 14, 2014), <http://www.ncsl.org/research/health/state-laws-and-actions-challenging-ppaca.aspx>.

<sup>16</sup> *Total Number of Medicare Beneficiaries*, <http://kff.org/medicare/state-indicator/total-medicare-beneficiaries/> (2012 numbers) (last visited Apr. 20, 2014).

<sup>17</sup> E.g., Tom Howell, Jr., *House Votes to Thwart Cuts to Medicare Payments; Quick Vote Stirs Controversy*, Washington Times (Mar. 27, 2014), <http://www.washingtontimes.com/news/2014/mar/27/house-gop-struggles-pass-medicare-doc-fix/>.

**C. WCNC-TV failed to disclose the information required by law.**

WCNC-TV uploaded the following to its online political file for the sale of airtime for “Bad Company”: the contract, which discloses rates, dates, and times the ad ran, in compliance with section 315(e)(2)(A)-(D); and the National Association of Broadcasters (NAB) Form PB-18, “Agreement Form for Non-Candidate/Issue Advertisements.” Copies of both are included in Exhibit B.

WCNC-TV properly disclosed the candidate referred to in the ad, but failed to disclose the issue addressed by the ad. The NAB form provides the space for stations to meet the disclosure requirements of § 315 of the Communications Act. The form asks whether the ad communicates a “message relating to any political matter of national importance.” If yes, then the station must, in the next section, disclose the name of the candidate, the office being sought, the date of the election and/or the issue to which the ad refers. The form gives several examples of legislative issues of national importance, including the “Affordable Care Act.” WCNC-TV indicated on the NAB form that this ad communicates a message relating to a political matter of national importance. The station even attached the “Agreed Upon Schedule” on page 5, which is only necessary for ads that communicate a message of national importance. Despite these considerations, WCNC-TV never disclosed the issue referred to in the ad. This constitutes a violation of the Communications Act.

**Conclusion**

The Communications Act and FCC rules are intended to inform the public about the amount of spending and source of funding when broadcast stations air paid programming concerning candidates, elections, and political matters of public importance. WCNC-TV has failed to disclose this important information. Thus, the Campaign Legal Center and the Sunlight Foundation respectfully request that the FCC take prompt action to ensure that this information is made available to the public through WCNC-TV’s public file. We further request that the FCC

take other measures, such as assessing forfeitures and issuing a Public Notice reminding broadcast stations of their obligations, to ensure that this and other broadcast stations include all of the legally required disclosures in the future.

Respectfully submitted,

Of counsel:

Matthew J. Dulac  
Georgetown Law Student

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Angela J. Campbell  
Andrew Jay Schwartzman  
Institute for Public Representation  
Georgetown University Law Center  
600 New Jersey Avenue, NW  
Suite 312  
Washington, DC 20001  
(202) 662-9535

Dated: May 1, 2014

*Counsel for Campaign Legal Center  
and Sunlight Foundation*

## Exhibit A

This screenshot is from the Patriot ad “Bad Company,” available at: <https://www.youtube.com/watch?v=Vxi-CIzU4nA>.



THOM TILLIS  
*WITH* SPECIAL INTERESTS  
*HURTING* NORTH CAROLINA FAMILIES

PAID FOR BY PATRIOT MAJORITY USA, WWW.PATRIOTMAJORITY.ORG.  
NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE.  
PATRIOT MAJORITY USA IS RESPONSIBLE FOR THE CONTENT OF THIS ADVERTISING.

0:27 / 0:30

### Bad Company

patriotmajorityusa · 51 videos

11,496

Subscribe 97

Like Dislike

About Share Add to

Published on Feb 12, 2014

"In North Carolina, we put families first. But Senate candidate Thom Tillis sides with health insurance companies – he'd let them deny coverage for pre-existing conditions and raise rates for women needing mammograms. Tillis supports a plan that would end Medicare as we know it. And force seniors to spend up to \$1700 more for prescriptions. He's with the special interests; hurting North Carolina families."



## **Outside group launches attack ad on Thom Tillis**

John Frank, News Observer

February 12, 2014

<http://www.newsobserver.com/2014/02/12/3614927/outside-group-launches-attack.html>

A so-called “dark money” group is coming to Democrat Kay Hagan’s aid in North Carolina, unleashing a new TV ad Wednesday that attacks Republican frontrunner Thom Tillis.

Patriot Majority USA, a nonprofit that doesn’t disclose its donors, is putting \$500,000 toward running the ad for the next eight days, a spokesman said.

The 30-second spot doesn’t mention Hagan but it appears to be a response to ads from Americans for Prosperity attacking the first-term senator for supporting the federal health care law. AFP – which is backed by the brothers Charles and David Koch brothers –has spent more than \$6.5 million, on its effort with some estimates putting the price tag at \$8 million-plus.

In the “Bad Company” ad, Patriot Majority fights back on the same turf: the health care law. It attacks Tillis for opposing the Affordable Care Act, saying his stance means he “sides with health insurance companies.” The ad also claims Tillis “supports a plan that would end Medicare as we know it” for backing U.S. Rep. Paul Ryan’s proposed budget. A version of the claim was dubbed by fact-checker PolitiFact as the 2011 “lie of the year.”

The kicker – “Thom Tillis, he’s with special interests, hurting North Carolina families” – reiterates a theme Democrats are trying to use against Tillis. It also is the theme GOP rival Greg Brannon is using against the House speaker, who also faces Charlotte pastor Mark Harris and two other lesser-known candidates in the primary race.

Tillis campaign spokesman Jordan Shaw called on Hagan to speak out. “While Kay Hagan denounces the use of outside funds against her, liberals in DC are spending hundreds of thousands of dollars falsely attacking Thom Tillis,” he said in a statement. “Where is Kay Hagan’s statement condemning these ads? Liberals in DC know that Thom Tillis is the candidate to beat Kay Hagan, so they’re trying to use the same tired scare tactics to save Hagan’s rubber stamp for the Obama agenda.”

Hagan criticized Americans for Prosperity for not disclosing its donors and bashed the special interest money behind the effort. Now she is getting help from the same type of group. Hagan campaign spokeswoman Sadie Weiner on Wednesday said the senator supports the DISCLOSE Act to make all groups disclose donors and “increase transparency and accountability for all outside groups – Democratic or Republican.”

But Weiner stopped short of criticizing Patriot Majority for running the ads.

A Patriot Majority USA spokesman did not say where in the state the ad would appear but the size of the ad buy means it won’t reach the same voter-awareness levels as the AFP ads.

## Exhibit B

NAB Form PB-18 Issues

### AGREEMENT FORM FOR NON-CANDIDATE/ISSUE ADVERTISEMENTS

Station and Location:	Date:
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I, Terre Devastre

do hereby request station time concerning the following issue:

<u>Patriot Majority USA</u>
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Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks
<u>AS</u>	<u>ORDERED</u>				

This broadcast time will be used by: Patriot Majority USA

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**THIS PAGE MUST BE COMPLETED FOR PROGRAMMING THAT  
"COMMUNICATES A POLITICAL MATTER OF NATIONAL IMPORTANCE."  
FOR ALL OTHER ISSUE ADS, PLEASE GO TO PAGE 3.**

Programming that "communicates a political matter of national importance" includes (1) references to legally qualified candidates (presidential, vice presidential or congressional); (2) any election to Federal office (e.g., any references to "our next senator", "our person in Washington" or "the President"); and (3) a national legislative issue of public importance (e.g., Affordable Care Act, revising the IRS tax code, federal gun control or any federal legislation).

Does the programming (in whole or in part) communicate "a message relating to any political matter of national importance?"

Yes  No

For programming that "communicates a message relating to any political matter of national importance," list the name of the legally qualified candidate(s) the programming refers to, the offices being sought, the date(s) of the election(s) and/or the issue to which the communication refers (if applicable):

 Thom Tillis, US Senate, Primary 5/6/14

I represent that the payment for the above described broadcast time has been furnished by (name and address):

Robert Majumdar DSA PO Box 35522  
Washington, DC 20033-5522

and you are authorized to announce the time as paid for by such person or entity (hereinafter referred to as the "sponsor").

List the chief executive officers or members of the executive committee or the board of directors below (or attach separately):

Craig Varoga, Treasurer

For programming that "communicates a message relating to any political matter of national importance," attach Agreed Upon Schedule (Page 5)

**THIS PAGE MUST BE COMPLETED FOR PROGRAMMING THAT  
DOES NOT "COMMUNICATE A POLITICAL MATTER OF NATIONAL  
IMPORTANCE"**

I represent that the payment for the above described broadcast time has been furnished by (name and address):

Patent Majority USA

and you are authorized to announce the time as paid for by such person or entity (hereinafter referred to as the "sponsor").

List the chief executive officers or members of the executive committee or the board of directors below (or attach separately):

Craig Varga, Treasurer

**TO BE COMPLETED FOR ALL ISSUE ADVERTISEMENTS**

**THIS STATION DOES NOT DISCRIMINATE OR PERMIT DISCRIMINATION ON THE BASIS OF RACE OR ETHNICITY IN THE PLACEMENT OF ADVERTISING.**

The Sponsor agrees to indemnify and hold harmless the station for any damages or liability, including reasonable attorney's fees, that may ensue from the broadcast of the above-requested advertisement(s). **For the above-stated broadcast(s), the sponsor also agrees to prepare a script, transcript, or tape, which will be delivered to the station at least \_\_\_\_\_ before the time of the scheduled broadcasts.**

**TO BE SIGNED BY ISSUE ADVERTISER (SPONSOR)**

2/10/14                      *Joe Martin*                      202-338-8700  
Date                                      Signature                                      Contact Phone Number

**TO BE SIGNED BY STATION REPRESENTATIVE**

Accepted                       Accepted in Part                       Rejected

\_\_\_\_\_  
Signature                                      Printed Name                                      Title

### AGREED UPON SCHEDULE

For All Issue Advertisements That Communicate a Message Relating to Any Political Matter of National Importance

Broadcast Length	Time of Day, Rotation or Package	Days	Class	Times per Week	Number of Weeks
AS ORDERED					

Attach proposed schedule with charges (if available):

### AFTER AIRING OF BROADCASTS:

Attach invoices or Schedule Run Summary to this Form showing:

- (1) actual air time and charges for each spot;
- (2) the date(s), exact time(s) and reason(s) for Make-Good(s), if any; and
- (3) the amount of rebates given (identify exact date, time, class of broadcast and dollar amount for each rebate), if any.

**Note:** Because the FCC requires that the political file contain the actual time the rate for spots "communicating a political matter of national importance" air, that information should be included in the file as soon as possible. If that information is only generated monthly, the file should include the name of a contact person who can provide the times that and rates for specific spots aired. The FCC's online political files include a folder for "Terms and Disclosures." NAB suggests that, for stations subject to the online public file rule, the names of contact person(s) be placed in that folder.

# ORDER



**Orders**  
**Order / Rev:** 38767  
 Alt Order #: 07056258  
 Product Desc: PATRIOT MAJORITY USA  
 Estimate: 2561  
 Flight Dates: 02/11/14 - 02/24/14  
 Original Date / Rev: 02/10/14 / 02/10/14  
 Order Type: P-PAC

**WCNC - Charlotte**  
 Primary AE: Mick Nesci  
 Sales Office: T-WDC  
 Sales Region: NTL

**Agency**  
**Name:** Waterfront Strategies  
 Buying Contact:  
 Billing Contact:  
 3050 K Street NW  
 Washington, DC 20007

Billing Type: Cash  
 Billing Calendar: Broadcast  
 Billing Cycle: EOM/EOC  
 Agency Commission: 15%

**Advertiser**  
**Name:** Patriot Majority  
 Demographic: A35+  
 Product Codes: NonBallot Issue  
 Priority: 04-TR-  
 Revenue Codes: AGY, POL, GEN

NewBusiness Thru:  
 Order Separation: 00:15:00  
 Advertiser External ID: 28308  
 Agency External ID: 10957AG

**Bill Plan**

Start Date	End Date	# Spots	Gross Amount	Net Amount
01/27/14	02/20/14	68	\$77,000.00	\$65,450.00

**Totals**

Month	# Spots	Gross Amount	Net Amount	Rating
February 2014	68	\$77,000.00	\$65,450.00	0.00
<b>Totals</b>	<b>68</b>	<b>\$77,000.00</b>	<b>\$65,450.00</b>	<b>0.00</b>

**Account Executives**

Account Executive	Sales Office	Sales Region	Start Date / End Date	Order %
Mick Nesci			Start Of Order - End Of Order	100%

Order Share	Share	Total
WCNC - Charlotte	18%	\$77,000.00
Market	100%	\$427,777.78

Competitive Share	Share	Total
CABLE	0%	\$0.00
HCNC	0%	\$0.00
UNKWN	0%	\$0.00
WAXN	1%	\$4,277.78
WBTW	32%	\$136,888.89
WCCB	4%	\$17,111.11
WFVT	0%	\$0.00
WHKY	0%	\$0.00
WJZY	8%	\$34,222.22
WNSC	0%	\$0.00
WSOC	36%	\$154,000.00
WTM	0%	\$0.00
WUNE	0%	\$0.00
WUNG	0%	\$0.00
WVWB	1%	\$4,277.78

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
N 2	WCNC	02/13/14	02/17/14	News @ 5a M-F	CM	5:00 AM-6:00 AM	M--TF--	:30	3	\$200.0002-NF	0.00	NM		3	\$600.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>					<u>Rating</u>

Order / Rev: 38767  
 Alt Order #: 07056258  
 Flight Dates: 02/11/14 - 02/24/14

Advertiser: Patriot Majority  
 Product Desc: PATRIOT MAJORITY USA  
 Estimate: 2561  
 WCNC - Charlotte

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
N 2	WCNC	02/13/14	02/17/14	News @ 5a M-F News @ 5a M-F	CM	5:00 AM-6:00 AM	M--TF--	:30	3	\$200.00	2	0.00	NM	3	\$600.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/11/14	02/17/14	M--TF--		3			\$200.00			0.00			
N 3	WCNC	02/13/14	02/17/14	Early News ROS M-F 5:00 PM-6:00 PM	CM	5:00 PM-6:00 PM (5:00 PM-6:00 PM)	M--TF--	:30	3	\$350.00	6	0.00	NM	3	\$1,050.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/11/14	02/17/14	M--TF--		3			\$350.00			0.00			
N 4	WCNC	02/13/14	02/17/14	News @ 6a M-F News @ 6a M-F	CM	6:00 AM-7:00 AM	M--TF--	:30	3	\$400.00	2	0.00	NM	3	\$1,200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/11/14	02/17/14	M--TF--		3			\$400.00			0.00			
N 5	WCNC	02/13/14	02/17/14	Today Show Today Show	CM	7:00 AM-9:00 AM	M--TF--	:30	3	\$500.00	2	0.00	NM	3	\$1,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/11/14	02/17/14	M--TF--		3			\$500.00			0.00			
N 6	WCNC	02/13/14	02/17/14	Olympic Winter Zone Olympics Zone	CM	Various	M--TF--	:30	3	\$1,000.00	4	0.00	NM	3	\$3,000.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/11/14	02/17/14	M--TFSS		3			\$1,000.00			0.00			
7	WCNC	02/15/14	02/15/14	Early Morning ROS Sa-Su Early Morning ROS Sa-Su	CM	6:00 AM-10:00 AM	-----3-	:30	3	\$900.00	2	0.00	NM	3	\$2,700.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/10/14	02/16/14	-----3-		3			\$900.00			0.00			
8	WCNC	02/16/14	02/16/14	Early Morning ROS Sa-Su 7:00 AM-10:00 AM	CM	7:00 AM-10:00 AM (7:00 AM-10:00 AM)	-----3	:30	3	\$1,200.00	6	0.00	NM	3	\$3,600.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/10/14	02/16/14	-----3		3			\$1,200.00			0.00			
N 9	WCNC	02/13/14	02/17/14	Late News Olympics M-Su Late News Olympics M-Su	CM	Various	M--TFSS	:30	2	\$600.00	2	0.00	NM	2	\$1,200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/11/14	02/17/14	M--TFSS		2			\$600.00			0.00			
N 10	WCNC	02/13/14	02/17/14	News @ 6p M-F News @ 6p M-F	CM	6:00 PM-6:30 PM	M--TF--	:30	3	\$500.00	2	0.00	NM	3	\$1,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/11/14	02/17/14	M--TF--		3			\$500.00			0.00			
N 11	WCNC	02/13/14	02/17/14	Olympic Winter Day M-F Olympics Daytime M-F	CM	Various	M--TF--	:30	1	\$1,500.00	2	0.00	NM	2	\$3,000.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/10/14	02/16/14	---TF--		1			\$1,500.00			0.00			
		Week: 02/17/14	02/23/14	M-----		1			\$1,500.00			0.00			
12	WCNC	02/18/14	02/20/14	Olympic Winter Day M-F Olympics Daytime M-F	CM	Various	-TWT---	:30	1	\$1,500.00	2	0.00	NM	1	\$1,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/18/14	02/20/14	-TWT---		1			\$1,500.00			0.00			
13	WCNC	02/18/14	02/20/14	News @ 5a M-F News @ 5a M-F	CM	5a-6a	-TWT---	:30	1	\$200.00	2	0.00	NM	1	\$200.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/18/14	02/20/14	-TWT---		1			\$200.00			0.00			
14	WCNC	02/18/14	02/20/14	Early News ROS M-F 5:00 PM-6:00 PM	CM	5:00 PM-6:00 PM (5:00 PM-6:00 PM)	-TWT---	:30	1	\$350.00	6	0.00	NM	1	\$350.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/18/14	02/20/14	-TWT---		1			\$350.00			0.00			
15	WCNC	02/18/14	02/20/14	News @ 6a M-F News @ 6a M-F	CM	6a-7a	-TWT---	:30	1	\$400.00	3	0.00	NM	1	\$400.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/18/14	02/20/14	-TWT---		1			\$400.00			0.00			
16	WCNC	02/18/14	02/20/14	Today Show Today Show	CM	7a-9a	-TWT---	:30	2	\$500.00	2	0.00	NM	2	\$1,000.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/18/14	02/20/14	-TWT---		2			\$500.00			0.00			
17	WCNC	02/18/14	02/20/14	Olympic Winter Zone Olympics Zone	CM	Various	-TWT---	:30	1	\$1,000.00	4	0.00	NM	1	\$1,000.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/18/14	02/20/14	-TWT---		1			\$1,000.00			0.00			
18	WCNC	02/18/14	02/20/14	Late News Olympics M-Su Late News Olympics M-Su	CM	Various	-TWT---	:30	1	\$600.00	2	0.00	NM	1	\$600.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/18/14	02/20/14	-TWT---		1			\$600.00			0.00			
19	WCNC	02/18/14	02/20/14	News @ 6p M-F News @ 6p M-F	CM	6p-630p	-TWT---	:30	1	\$500.00	2	0.00	NM	1	\$500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>		<u>Spots/Week</u>			<u>Rate</u>			<u>Rating</u>			
		Week: 02/18/14	02/20/14	-TWT---		1			\$500.00			0.00			



Order / Rev: 38767  
 Alt Order #: 07056258  
 Flight Dates: 02/11/14 - 02/24/14

Advertiser: Patriot Majority  
 Product Desc: PATRIOT MAJORITY USA  
 Estimate: 2561  
**WCNC - Charlotte**

Ln	Ch	Start	End	Inventory Code	Break	Start/End Time	Days	Len	Spots	Rate	Pri	Rtg	Type	Spots	Amount
N 20	WCNC	02/13/14	02/17/14	Olympic Winter Day M-FCM Olympics Daytime M-F	CM	Various	M--TF--	:30	4	\$1,500.00	2-NF	0.00	NM	8	\$12,000.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
		Week: 02/10/14	02/16/14	---TF--					4	\$1,500.00		0.00			
		Week: 02/17/14	02/23/14	M-----					4	\$1,500.00		0.00			
N 21	WCNC	02/15/14	02/16/14	Olympic Winter Day Sa-Su Olympics Daytime Sa-Su	CM	Various	-----SS	:30	2	\$4,250.00	3-TF	0.00	NM	2	\$8,500.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
		Week: 02/10/14	02/16/14	-----SS					2	\$4,250.00		0.00			
N 22	WCNC	02/13/14	02/17/14	Olympic Winter LateFringe Olympics LateFringe	CM	Various	M--TF--	:30	2	\$1,500.00	2-NF	0.00	NM	4	\$6,000.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
		Week: 02/10/14	02/16/14	---TF--					2	\$1,500.00		0.00			
		Week: 02/17/14	02/23/14	M-----					2	\$1,500.00		0.00			
N 23	WCNC	02/17/14	02/17/14	News @ 5a M-F News @ 5a M-F	CM	5a-6a	M-----	:30	1	\$100.00	3-TF	0.00	NM	1	\$100.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
		Week: 02/17/14	02/23/14	M-----					1	\$100.00		0.00			
N 24	WCNC	02/13/14	02/17/14	News @ 6a M-F News @ 6a M-F	CM	6a-7a	M--TF--	:30	3	\$350.00	3-TF	0.00	NM	6	\$2,100.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
		Week: 02/10/14	02/16/14	---TF--					3	\$350.00		0.00			
		Week: 02/17/14	02/23/14	M-----					3	\$350.00		0.00			
N 25	WCNC	02/13/14	02/17/14	Today Show Today Show	CM	7a-9a	M--TF--	:30	4	\$550.00	3-TF	0.00	NM	8	\$4,400.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
		Week: 02/10/14	02/16/14	---TF--					4	\$550.00		0.00			
		Week: 02/17/14	02/23/14	M-----					4	\$550.00		0.00			
N 26	WCNC	02/13/14	02/17/14	Olympic Winter Prime Olympics Prime	CM	Various	M--TFSS	:30	1	\$9,500.00	2-NF	0.00	NM	2	\$19,000.00
		<u>Start Date</u>	<u>End Date</u>	<u>Weekdays</u>					<u>Spots/Week</u>	<u>Rate</u>		<u>Rating</u>			
		Week: 02/10/14	02/16/14	---TFSS					1	\$9,500.00		0.00			
		Week: 02/17/14	02/23/14	M-----					1	\$9,500.00		0.00			
													Totals	68	\$77,000.00