

## Attachment E

### Standard Questions for Section 310(b) Petition for Declaratory Ruling Involving a Broadcast Licensee

**Petitioner(s):**

**FCC File Number(s):**

**Purpose:** This list of standard questions solicits the initial information that the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (Committee) will review in connection with any referral of the above-referenced Petition by the Federal Communications Commission (FCC) in order to assess any national security and law enforcement concerns raised by the Petition. After review, the Committee may request additional information, including through tailored questions. The 120-day initial review period will typically start on the date the Chair of the Committee determines that your responses to these standard questions and any tailored questions, when required, are complete. If the Committee determines no tailored questions are necessary, the 120-day initial review period will start no more than 30 days after the FCC's referral, on the date the Committee informs the FCC that the responses to the standard questions are complete and that no tailored questions are required. If you fail to provide timely responses to any Committee requests for information, the Committee may recommend that the FCC dismiss the Petition without prejudice.

**Dissemination of Information:** The information received by the Committee pursuant to 47 CFR § 1.40003 and any subsequent requests for information by the Committee may be shared and used in accordance with Section 8 of Executive Order 13913 of April 4, 2020, Establishing the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector, 85 Fed. Reg. 19643 (Apr. 8, 2020).

### Instructions

- 1) Who Must Respond to this Questionnaire:** A Petitioner that seeks to obtain (a) a section 310(b)(4) foreign ownership ruling in connection with an application for a new broadcast license or (b) a new or modified 310(b)(4) foreign ownership ruling in connection with an application for assignment, transfer of control, or other change in ownership or control of the Licensee must respond to this questionnaire. In the case of (b), a Petitioner must provide information pertaining to the post-transaction ownership, structure, and operations of the Licensee and Relevant Parties. As used in this questionnaire, the term "Licensee" refers to both an Applicant for a broadcast license and an existing licensee.
- 2) Complete all Sections:** When a "Yes" answer is indicated, provide further information as appropriate. The questions seek further details regarding the Applicant and security-related practices and some questions are particularly directed at identifying and assessing the complete scope of the equipment that the Applicant will be operating and the services the Applicant will be offering should the FCC grant those authorities. Accordingly, in answering the "Section V: Licensee Services" questions, the Applicant(s) must file complete and accurate responses.
- 3) Response Format:** Uniquely and sequentially Bates-number your responses to the standard questions, including any attachments, with an endorsement on each page. The Bates number must be a unique, consistently formatted identifier; the number of digits in the numeric portion of the format

should not change in subsequent productions, if any, nor should spaces, hyphens, or other separators be added or deleted. Produce any Excel documents in native format (if desired, you may also produce a PDF version for record keeping purposes).

- 4) **Identify Sensitive Information:** Specifically identify answers or documents that you deem to be privileged or confidential as the information contains trade secrets or commercial or financial information. If there are multiple petitioners, each petitioner should also clearly mark any answers or documents that contain sensitive information that should not be disclosed to the other petitioners. Personally Identifiable Information (PII) may be submitted in a separate attachment. The PII Supplement is Attachment G.
- 5) **Individuals' names:** For names that follow different naming conventions, such as the use of surnames as first names (e.g., Korean names), or the use of mother's last name as one of two last names that are often hyphenated (e.g., Spanish names), follow standard English convention for purposes of completing this information. For example, if the name is Kim Chul-su, write "Chul-su Kim" in the form. If the name in Spanish is Juan Garcia-Reyes, write "Juan Garcia Reyes."
- 6) **Residential Addresses:** Contract mail receipt locations, post office boxes, co-working or shared virtual locations may not be used in lieu of residence addresses.
- 7) **Business Addresses:** For each business address, clearly indicate whether the address is a shared business venue, co-working location, virtual office, or traditional physical office.
- 8) **Obligation to Update:** The Applicant must inform the Committee if there is any material change to any of the information provided in the Applicant's responses while the Committee's review is ongoing, including, but not limited to, changes in ownership and equipment.
- 9) **Definitions** – These terms, as used in this questionnaire, have the following definitions:
  - A "Controlling Interest" is generally a 50% or greater Ownership Interest (either equity or voting). Also, a Controlling Interest shall be determined on a case-by-case basis considering the distribution of ownership, and the relationships of the owners, including family relationships. The term Controlling Interest includes Individuals or Entities with positive or negative *de jure* or *de facto* control of the Applicant/Licensee. *De jure* control includes holding 50% or more of the voting stock of a corporation or holding a general partnership interest in a partnership. Ownership Interests that are held indirectly by any party through one or more intervening corporations may be determined by successive multiplication of the ownership percentages for each link in the vertical ownership chain except that if the ownership percentage for an interest in any link in the chain is equal to or exceeds 50% or represents actual control, it may be treated as if it were a 100% interest. *De facto* control is determined on a case-by-case basis. Examples of *de facto*, or actual, control include constituting or appointing 50% or greater of the board of directors or management committee; having authority to appoint, promote, demote, and fire senior executives that control the day-to-day activities of the Applicant/Licensee; or playing an integral role in management decisions. In the case of a consortium, each member of the consortium shall be considered to have a Controlling Interest in the consortium.
    - "Ultimate Owner" and "Ultimate Parent" refer to the Entity or Individual that ultimately owns and controls the Applicant/Licensee.
    - "Immediate Owner" refers to the Entity or Individual in the vertical ownership chain that immediately owns and controls the Applicant/Licensee. In other words, the Immediate

Owner is the Entity or Individual in the ownership chain that is closest to the Applicant/Licensee.

- An Entity or Individual with an “Ownership Interest” is any entity in the ownership chain with more than a 5% attributable interest in the Applicant/Licensee, including the “Ultimate Owner/Parent” to the “Immediate Owner,” and all Controlling Interest holders. Note that Controlling Interests include *de facto* control, for which equity and/or voting ownership may be below 5%.
- “Corporate Officer” refers to any Individual hired or appointed by the Entity’s board of directors that has actual or apparent authority to exercise day-to-day management responsibilities over an Entity .
- “Director” refers to any Individual serving on an Applicant’s board of directors or similar governing body organized to set policies for corporate management of or oversight for an Applicant.
- “Entity” includes a partnership, association, estate, trust, corporation, limited liability company, consortium, joint venture, governmental authority, or other organization.
- An “Equity Interest Holder” is any Individual or Entity that has the right to receive or the power to direct the receipt of dividends from, or the proceeds from the sale of, a share or other ownership stake in the Applicant.
- The term “Foreign Government” includes any person or group of persons exercising sovereign *de facto* or *de jure* political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign *de facto* or *de jure* authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States.
- The term “Foreign Political Party” includes any organization, or any other combination of individuals in a country other than the United States, or any unit or branch thereof, having for an aim or purpose, or which is engaged in any activity devoted in whole or in part, to the establishment, administration, control, or acquisition of, administration, or control, of a government of a foreign country, or a subdivision thereof, or the furtherance, or influencing, of the political, or public, interests, policies, or relations of a government of a foreign country, or a subdivision thereof.
- The term “Foreign Principal” includes:
  - (1) a government of a foreign country and a foreign political party;
  - (2) a person outside of the United States, unless it is established that such person is an individual and a citizen of and domiciled within the United States, or that such person is not an individual and is organized under or created by the laws of the United States or of any State or other place subject to the jurisdiction of the United States and has its principal place of business within the United States; and
  - (3) a partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country.
- “Individual” refers to a natural person, as distinguished from an Entity.
- The term “Information-service Employee” includes any person who is engaged in furnishing, disseminating, or publishing accounts, descriptions, information, or data with respect to the political, industrial, employment, economic, social, cultural, or other benefits, advantages, facts, or conditions of any country other than the United States or of any government of a foreign country or of a foreign political party or of a partnership, association, corporation, organization, or other combination of individuals organized under the laws of, or having its principal place of business in, a foreign country.
- A “Non-U.S. Individual” is an Individual who is not a U.S. citizen.

- An “Owner” is an Individual or Entity that holds an Ownership Interest in the Applicant/Licensee.
- An “Ownership Interest” is a 5% or greater equity (non-voting) and/or voting interest, whether directly or indirectly held, or a Controlling Interest in the Applicant, and includes the ownership in the ultimate parent/owner of the Applicant and any other Entity(ies) in the chain of ownership (i.e., all entities that exist in the ownership structure between the Applicant itself and its ultimate parent).
- The term “Political Consultant” means any person who engages in informing or advising any other person with reference to the domestic or foreign policies of the United States the political or public interest, policies, or relations of a foreign country or of a Foreign Political Party.
- The term “Publicity Agent” includes any person who engages directly or indirectly in the publication or dissemination of oral, visual, graphic, written, or pictorial information or matter of any kind, including publication by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or otherwise.
- The term “Public-Relations Counsel” includes any person who engages directly or indirectly in informing, advising, or in any way representing a principal in any public relations matter pertaining to political or public interests, policies, or relations of such principal. “Remote Access” is access from a point that is not physically co-located with the Applicant’s network facilities, or that is not at a point within the Applicant’s network.
- “Senior Officer” refers to the Chief Executive Officer, President, Chief Financial Officer, Chief Information Officer, Chief Technical Officer, Chief Operating Officer, Senior Vice President, or any other similarly situated Individual that has actual or apparent authority to act on behalf of the Entity.

### **Section I: Identification of Relevant Parties**

- 1) Provide the name, address, principal place of business, and place of incorporation of Relevant Parties. For the purposes of the following questions, “Relevant Parties” means the following:
  - a) Proposed Broadcast Licensee (“**Licensee**”);
  - b) Proposed Controlling U.S. Parent of the Licensee (“**Petitioner**”); and
  - c) Any Individual or Entity with an Ownership Interest in either the Licensee or the Petitioner (“**Owner(s)/Controller(s)**”).

### **Section II: Petitioner/Licensee Ownership**

- 2) To the extent not otherwise identified in response to Question 1, identify each Individual or Entity that holds an Ownership Interest in the Relevant Parties specifically identifying any foreign Entities, Foreign Government-controlled Entities, including the Ultimate Parent Entity of the Licensee and Petitioner and any other Individuals or Entities holding an Ownership Interest in the chain of ownership.
  - a) For each Individual or Entity with Ownership Interest in any of the Relevant Parties (identified in response to either Question 1 or Question 2), include a clear explanation of its involvement in the Relevant Party, including whether the Individual or Entity will have a management role in the Petitioner or Licensee.
  - b) For each Individual or Entity with Ownership Interest in any of the Relevant Parties (identified in response to either Question 1 or Question 2), provide all identifying information, as follows:
    - i) For Individuals, provide name (including all names and aliases used by that person), country of citizenship (indicate whether the individual is a dual citizen and all countries where citizenship is held), date and place of birth, U.S. alien number (indicate whether the individual is a U.S. Lawful Permanent Resident) and/or social security number (if applicable), passport identifying information (including number and country), all residence addresses, all business addresses, and all phone numbers. PII may be provided in Attachment G, a PII Supplement to the Standard Questions.
    - ii) For Entities, provide country of incorporation (if United States, include state of incorporation), principal place of business, general business type (e.g., holding company, investment firm, etc.), all business addresses, email addresses, and related phone numbers.

### **Section III: Petitioner/Licensee Details**

- 3) Do any of the Relevant Parties have existing, planned, or prior relationships, partnerships, funding arrangements, or service contracts, directly or indirectly, with any of the following:
  - a) Foreign companies or foreign Entities;
  - b) Any Foreign Government or any Entity owned or controlled by a Foreign Government;
  - c) Any foreign political entities or Foreign Political Parties;

- d) An Individual or Entity outside the United States, not a citizen of, or domiciled within, the United States, or not subject to the jurisdiction of the United States, and not having as a principal place of business or presence in the United States; or

Yes  No

If yes to any question above, explain each answer in detail.

If yes, all such parties identified by the Relevant Parties will be referred to as a "Foreign Party."

- 4) Have any of the Relevant Parties been involved in bankruptcy proceedings, or any other legal proceeding undertaken for the purpose of liquidating, reorganizing, refinancing, or otherwise seeking relief from all or some of the Relevant Party's debts in any jurisdiction over the past 5 years?

Yes  No

If yes, provide details.

- 5) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, or Directors ever been involved or associated with a previous application to the FCC?

Yes  No

If yes, provide application identifying information.

- 6) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, or Directors ever been involved or associated with a previous filing with the Committee on Foreign Investment in the United States (CFIUS)?

Yes  No

If yes, provide filing identifying information.

- 7) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, or Directors ever been blocked, sanctioned, penalized, or had an authorization or other permission revoked/terminated by the FCC?

Yes  No

If yes, provide details.

- 8) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, or Directors ever been blocked, sanctioned, penalized, or had an authorization or other permission prohibited, suspended, or revoked by CFIUS?

Yes  No

If yes, provide details.

- 9) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, or Directors ever been convicted of any felony (an offense carrying a maximum potential sentence of a term of imprisonment of more than a year) in the United States or any other country? This includes any settlements or negotiated resolutions, non-prosecution agreements, or deferred prosecution agreements.  
Yes  No

If yes, provide details, including name(s) of the Individual or Entity involved, dates, offenses, jurisdiction/court, and sentence.

- 10) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, or Directors ever been subject to any criminal, administrative, or civil penalties imposed for violating the regulations of the FCC, U.S. Department of State, U.S. Department of the Treasury (including, but not be limited to, the Internal Revenue Service, Office of Foreign Assets Control, Financial Crimes Enforcement Network (FinCEN), or the Office of the Comptroller of the Currency), U.S. Department of Energy, U.S. Department of Commerce, U.S. Federal Trade Commission, U.S. Securities and Exchange Commission, U.S. Environmental Protection Agency, the World Bank Group, or the U.S. Commodity Futures Trading Commission, or for violating the regulations of any comparable state or foreign agency? This includes any settlements or negotiated resolutions, non-prosecution agreements, or deferred prosecution agreements.  
Yes  No

If yes, provide details, including name(s) of the Individual or Entity involved, dates, violations, agency, penalty, and if a fine was imposed, status of payment.

- 11) Have any of the Relevant Parties, any of their Corporate Officers, Senior Officers, or Directors, or any associated foreign Entities ever been on the Specially Designated Nationals And Blocked Persons List (SDN List), the BIS Unverified List, or Entity List in 15 CFR part 744, or equivalent list of the United Nations Security Council or European Union?  
Yes  No

If yes, provide details.

- 12) Have any of the Relevant Parties or any of their Corporate Officers, Senior Officers, or Directors, or any Foreign Party ever been investigated, arraigned, arrested, indicted or convicted of any of the following (to include any settlements or negotiated resolutions, non-prosecution agreements, or deferred prosecution agreements):

- a) Criminal violations of U.S. law, including espionage-related acts or violations of the Foreign Agents Registration Act (FARA)?  
Yes  No

- b) Deceptive sales practices, violations of the Telemarketing and Consumer Fraud Act and regulations, 15 U.S.C. § 6101 *et seq.*, 16 C.F.R. §§ 310.1-310.8, and/or Fraud or Prohibited Practices in Contests in violation of 47 U.S.C. § 509, 18 U.S.C. § 1304, and/or other fraud or abuse practices whether pursuant to local, state, or federal law?  
Yes  No

- c) Bribery or kickbacks paid in any foreign country, to a foreign official or foreign candidate for any office, in order to establish or enhance business, influence any government decision whether or not related to telecommunications, or to gain access to or advantage over broadcast frequencies or

markets, natural resources, telecommunications markets, or infrastructure, or any other advantage, whether or not such investigation resulted in a conviction, fine, or loss of any license or privilege?

Yes  No

If yes to any of the above questions, describe in detail, including name(s) of Individuals and Entities involved, date(s), and current status or final disposition of matter, including any terms of settlement. Provide any available supporting documentation.

**13) Is any Relevant Party or Foreign Party registered as an agent under the Foreign Agents Registration Act, 22 U.S.C. § 611(c)(10)?**

Yes  No

If yes, explain in detail. Should the Relevant Party or Foreign Party, wish to confer with the Foreign Agent Registration Act Unit, National Security Division, United States Department of Justice, to determine whether registration is required, contact the Foreign Investment Review Section.

**14) Is any Relevant Party or Foreign Party presently engaged in, or anticipate engaging in, any of the following on behalf of a Foreign Principal, foreign country, Foreign Government, or foreign agent of a Foreign Principal?**

- a) Within the United States, engaging in political activities for, or in the interests of, such a Foreign Principal, foreign country, or Foreign Government;
- b) Within the United States, soliciting, collecting, disbursing, or dispensing contribution, loans, money, or other things of value for, or in the interest of, such Foreign Principal, foreign country, or Foreign Government; or
- c) Within the United States, representing the interests of such Foreign Principal, foreign country, or Foreign Government before any agency, or official, of the Government of the United States.

If yes to any question above, explain each answer in detail.

**15) Is any Relevant Party or Foreign Party presently engaged in, or anticipate engaging in, any of the following on behalf of a Foreign Principal, foreign country, Foreign Government, or foreign agent of a Foreign Principal?**

- a) Undertaking, or directing, an act within the United States as a Publicity Agent or Information-Service Employee for, or in the interests of, such Foreign Principal, foreign country, or Foreign Government; or
- b) Undertaking, or directing, an act within the United States as a Public Relations Counsel or Political Consultant for, or in the interests of, such Foreign Principal, foreign country, or Foreign Government.

If yes to any question above, explain each answer in detail.



16) Whether or not the answer to any of the questions above is “yes,” has any Relevant Party or Foreign Party received, or anticipate receiving, any funding from any Foreign Government, or Foreign Political Party, directly or indirectly?

Yes  No

If yes:

- a) Explain the nature of the current/planned relationships with, or funding by, all foreign Entities in detail;
- b) Provide all funding amounts, whether provided directly or indirectly, including amounts itemized and aggregated for the prior ten years; and
- c) Provide copies of any and all contracts, or agreements, with the foreign Entities. If not memorialized in writing, explain the understanding between the Petitioner, or Foreign Party, and the foreign Entity or government.

17) Whether or not the answer to any of the questions above is “yes,” will any Foreign Government or Foreign Political Party, directly or indirectly, have any direction, control, or influence of any activity of any Relevant Party or Foreign Party?

Yes  No

If yes to any question above, explain each answer in detail.

18) Identify the Individuals who will be responsible for adhering to the FCC’s political advertising rules and maintaining a Political File pursuant to 47 CFR § 73.1943, and describe that Individual’s role with the Relevant Party or Foreign Party.

Provide the responsive information in the chart below:

Responsible Person	Title/Role of the Responsible Person	Applicable TV/Radio Station	Call Sign

19) Will any non-U.S. Individual, owners, or management, including independent or third-party Individuals/Entities of the Relevant Party or Foreign Party have access to one or more of the following:

- a) Physical facilities or equipment under the Relevant Party’s or Foreign Party’s control; or
- b) Electronic interfaces that allow control, or monitoring, of the facilities or infrastructure under the Relevant Party’s or Foreign Party’s control, including access to actual programming content and content distribution.

Yes  No

If yes to either (a) or (b), explain the type of access and control that will be provided, and provide the following information:

- i. Full name(s) and alias(es);
- ii. Country(ies) of citizenship (If multiple countries of citizenship, list all countries.);
- iii. Employer name and relationship to either party;
- iv. Date of birth;
- v. Place of birth;
- vi. Social Security Number (SSN) (if applicable);
- vii. U.S. Alien Number (if applicable);
- viii. Passport Number(s) and complete name of country(ies) of issuance (If multiple passports, list all passport numbers and the complete name of the country of issuance.);
- ix. Cellular/mobile phone number(s);
- x. Home phone number(s);
- xi. Email address(es) used (including business and personal);
- xii. Residence address(es);
- xiii. Business address(es); and
- xiv. Business phone number(s).

**20)** Does the Relevant Party or any Foreign Party have any screening or vetting procedures that will be applied to U.S. or non-U.S. Individuals who have access, remote or otherwise, to communications facilities, broadcast-network facilities, equipment, or data?

Yes  No

If yes, explain all such procedures in detail.

**21)** Does the Relevant Party or any Foreign Party currently operate a website?

Yes  No

If yes, provide all URL addresses for any current or known future websites and describe whether the information therein is up to date.

- 22) Identify the total number of current employees of the Relevant Parties and the total number of planned employees for the next 12 months, and provide the following information:
- a) Where are, or will, those employees be located for purposes of work?
  - b) Describe the access each category of employee (e.g., Publicity Agent, Information-Service Employee, remote sales force, billing support, executives, technical support, content review, content approval) will have to:
    - i. The Licensee's network;
    - ii. The Licensee's business locations;
    - iii. The physical facilities, equipment, or network elements owned, controlled, or leased by the Licensee;
    - iv. Any production facilities, or equipment, whether under the direct control of either the Licensee or under the control of independent third parties tasked or contracted for services; and
    - v. Customer/listener records of any kind, including billing records, listening platform used (e.g., app, online, subscription service), and other listener profile information, such as geolocation information, listening habits, political or national affiliation, and aggregated or compiled data of customers obtained as a result of the provision of services or acquired from third parties for any purpose.

**Section IV: Licensee Operations**

- 23) Has the Licensee been operational over the course of the current and/or previous year?  
Yes  No

If yes, provide financial statements and records for the Licensee and Petitioner for the current and preceding year.

- 24) Name each of the Relevant Party's Corporate Officers, Senior Officers, and Directors and for each provide the following:
- a) Explain the nature and extent of each Corporate Officer's, Senior Officer's, and Director's involvement in the Entity's business; and
  - b) Provide all countries of citizenship, date and place of birth, U.S. alien number (indicate whether the Individual is a U.S. Lawful Permanent Resident) and/or social security number (if applicable), passport identifying information (including number and country), all residence addresses, all business addresses, and all phone numbers. PII may be provided in Attachment G.

- 25) Identify the Senior Officer or employee (who is a U.S. citizen residing in the United States with an active security clearance or who is eligible to obtain one) who will be the Licensee's authorized law enforcement point of contact responsible for accepting and responding to requests or compulsory processes from U.S. law enforcement or other U.S. government agencies.
- a) Explain the Individual's relationship to the Licensee and provide name, all countries of citizenship, date and place of birth, U.S. social security number, all passport identifying information (including number and country), all residence addresses, all business addresses, and all phone numbers. Also identify whether the Individual has an active U.S. Government security clearance. PII may be provided in Attachment G.
- 26) Provide all U.S. and foreign addresses (complete postal addresses) of the present and anticipated locations of the Relevant Party's and any Foreign Party's:
- a) Facilities, whether owned, leased, used or shared;
  - b) Broadcast locations;
  - c) Editorial locations;
  - d) Data storage locations; and
  - e) Locations where content is reviewed, whether or not content is edited.

**Section V: Licensee Services**

- 27) List the types of broadcast licenses held (or applied for) by the Licensee (e.g. radio, television) including the geographic area of service for each type of license.
- 28) Provide a general summary of the nature of the Licensee's current and planned services and operations, to include an explanation of the Licensee's intended overall business model and its relationship with any sister and/or partner companies.

Explain why the Licensee and/or Petitioner is seeking foreign investment/ownership.

- 29) Will programming be rebroadcast via satellite or cable?  
 Yes  No

If yes, provide details.

- 30) Will programming be available online?  
 Yes  No

If yes, describe the streaming business operation (including what platform(s) will be used to make the programming available online).

**31)** Describe the intended viewer/listener base of the Licensee's broadcasts, primary language spoken of the target audience, and other demographics, including:

- a) An explanation of how services are offered to each category of viewers/listeners and platform; and
- b) Identification of any specific business or economic sectors that supply advertising or other assistance to either the Licensee, Petitioner, or any Foreign Party.

**32)** Does any Relevant Party, any Foreign Party, or any of its subsidiaries or parents provide broadcast services of any kind in any foreign country or in the United States?

Yes  No

If yes, list all services provided in each country where those services are provided.

**33)** Does any Relevant Party, any foreign Owner (or its affiliates), or any Foreign Party intend to allow Non-U.S. Individuals, investors, Entities, or governments to provide any influence, direction, control, commentary, or guidance on the content of programming to be broadcast?

- a) If yes, does any Relevant Party, any foreign Owner (or its affiliates), or any Foreign Party intend to place any restrictions, or limitations, on how Non-U.S. Individuals, investors, Entities, or governments may influence, direct, control, comment, or guide the content of programming to be broadcast?
- b) What, if any, policies, procedures, and protocols does any Relevant Party, any foreign Owner (or its affiliates), or any Foreign Party intend to put in effect to restrict, limit, or prohibit Non-U.S. Individuals, investors, Entities, or governments from providing influence, direction, control, commentary, or guidance on the content of programming to be broadcast?
- c) To the extent that any Relevant Party, any foreign Owner (or its affiliates), or any Foreign Party has any such policies, procedures, and protocols in effect now, produce copies of those materials.

**34)** Indicate whether any Relevant Party, any Foreign Party, or any of its subsidiaries that offer application or web-based content collect, process, or store any U.S. subscriber data. If so, identify what types of data (e.g. name, address, email address, phone number, credit card number, etc.) are collected, processed, or stored for each U.S. subscriber.

- a) Indicate where any U.S. subscriber data identified here is stored and who serves as the custodian for such data. Also indicate who has access to such data and whether each individual with access is a U.S. or non-U.S. citizen.
- b) If U.S. subscriber data is disclosed/will be disclosed to third parties (service providers, third party advertisers, etc.) please identify which companies it is disclosed to (i.e., company name, address, and business relationship to Licensee)?
  - i. What U.S. customer data is disclosed?
  - ii. What, if any, limitations are placed on the third party's use of the data?
  - iii. What, if any, limitations are placed on third party's further disclosure of the data?
  - iv. What, if any, data security/storage standards does Licensee require of third parties?

- c) Indicate whether any Relevant Party, any Foreign Party, or its subsidiaries have deployed any security measures, protocols, or policies to protect subscriber data identified here from unauthorized access or disclosure. Describe each measure, protocol, or policy in place to protect U.S. subscriber data. If the measures have been audited, provide the results of the audits.

**WARNING**

If the Petitioner or Licensee knowingly and willfully (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact; (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry, the Petitioner or Licensee may be subject to prosecution under Title 18, United States Code, Section 1001. The FCC may terminate, revoke, or render null and void any license or authorization granted in this matter if any responses provided are false or intentionally misleading.

**Licensee Certification**

Pursuant to Title 28, United States Code, Section 1746, I, an authorized representative of the Licensee, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this \_\_\_\_\_ day of \_\_\_\_\_, year of \_\_\_\_\_.

Representative Name: \_\_\_\_\_

Representative Title: \_\_\_\_\_

Representative Signature: \_\_\_\_\_

**Petitioner Certification**

Pursuant to Title 28, United States Code, Section 1746, I, an authorized representative of the Petitioner, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this \_\_\_\_\_ day of \_\_\_\_\_, year of \_\_\_\_\_.

Representative Name: \_\_\_\_\_

Representative Title: \_\_\_\_\_

Representative Signature: \_\_\_\_\_