

**CARTOON NETWORK
CERTIFICATE OF COMPLIANCE WITH COMMERCIAL LIMITS
FOR CHILDREN'S PROGRAMMING**

I, Toni Millner, in my capacity as Assistant General Counsel for Turner Broadcasting System, Inc. ("Turner"), hereby certify to the best of my information, knowledge, and belief, that the following information is accurate for the period from October 1, 2014 to December 31, 2014:

- 1) I am familiar with the statutory limits of the Children's Television Act of 1990 (the "Act") and the FCC regulations implementing those limits (no more than 12 minutes per hour of commercial matter may be telecast during children's programming* on weekdays, and no more than 10 ½ minutes per hour on weekends).
- 2) From October 1, 2014 to December 31, 2014, Turner treated all of the programs telecast on the Cartoon Network, a 24-hour program service, as "children's programming" for the purposes of the commercial limits set forth in the Act, except for its telecast in the "Adult Swim" block of programming created for an adult audience that airs late night seven days a week.** The Adult Swim block contains hourly warnings to notify and remind viewers that the content is intended for an adult audience, and is not considered "children's programming" subject to the commercial limits set forth in the Act. On a weekly basis, therefore, approximately 98 hours of television programming were treated as "children's programming" for the purposes of the commercial limits set forth in the Act.
- 3) Turner has, as a standard practice, formatted and telecast all of the programs carried on the Cartoon Network during the period noted above within the commercial limits set forth in the Act, to the extent applicable to the programming. These practices were closely followed except only for the following inadvertent incident involving the improper placement of a commercial.
- 4) An advertisement for a product related to a program was inadvertently placed within the commercial break of the related programming on December 7, 2014. A more detailed account of this incident is attached as Exhibit 1. This incident was the result of unintentional, human error.
- 5) Cartoon Network regrets this incident, which Cartoon Network proactively investigated and reported. Moreover, we urge that they be viewed in the context of the large amount of children's programming that Cartoon Network has telecast this period without incident and in full compliance with the Kid Vid rules and regulations.

Certified by me this 5th day of January, 2015.



Toni Millner
Assistant General Counsel and
Vice President - Kid Vid Compliance
Turner Broadcasting System, Inc.

* "Children's programming" for the purposes of the commercial limit means "programs originally produced and broadcast primarily for an audience of children 12 years and under."

**During this period, the "Adult Swim" block of programming aired from 8 p.m. to 6 a.m., 7 nights a week.

Exhibit 1 –to Cartoon Network’s KidVid Certificate of Compliance – 2014, 4th Quarter

During this quarter, there was one incident in which an advertisement for a product was placed within the commercial break of related programming due to unintentional human error.

The advertisement at issue was a 30-second commercial for a video game rental subscription service called Gamefly.com. The end of the commercial included a dozen images with a variety of games available on the online service, including a quick image of a game featuring Sonic Boom characters. This advertisement inadvertently was telecast in a commercial break of the Sonic Boom series airing on Cartoon Network at approximately at 6:27 a.m., Sunday, December 7, 2014.

Cartoon Network’s compliance process to ensure that advertisements do not contain characters from adjacent television programs is a manually intensive process that involves the daily review of a high volume of advertisements and multiple personnel. Unfortunately, a mistake was made on this one occasion. Although the KidVid personnel had correctly coded the commercial to identify the spot as containing program-related elements and request a log change to move the commercial to a different time of day in accordance with Cartoon Network’s KidVid compliance procedures, the weekend personnel in the Control Room inadvertently failed to make the log change request to move the commercial away from related programming.

The personnel involved appreciate the importance of the KidVid rules and procedures, but simply made a mistake. KidVid refresher training has been conducted one on one with each operator to reinforce full compliance with these practices.