

**KZMM-CD Children’s Programming Comprehensive Amendment,
Third Quarter 2018 through Second Quarter 2019**

KZMM-CD (“KZMM” or the “station”) was acquired by HC2 Station Group, Inc. (“HC2”) on February 14, 2018. HC2 hereby amends the KZMM children’s programming reports for the Third Quarter 2018 through Second Quarter 2019.

First Quarter of 2018 - COMPLIANT

KZMM timely filed its first quarter 2018 children’s programming report on April 10, 2018 (FCC File Number: 0000051963). The report correctly indicates that the station broadcast an average of 4.5 hours per week of core programming on the primary channel (channel 22.2).¹

The report also correctly indicates that the average number of hours per week of free over-the-air digital video programming broadcast by the station on other than its main program stream was 587 hours, which represents three full-time multicast channels plus channel 22.1 which aired for only six weeks during the quarter, as described in the footnote below. The three and a half multicast stations aired a total of 196 hours of core programming during the quarter. When divided by 3 ½ stations over 13 weeks, this equals an average of 4.3 hours per week of core programming broadcast by the station per multicast station. The 16.5 hour figure referenced in the report appears to be an inadvertent miscalculation. However, it is clear from the report that the station aired substantially more core programming on its multicast channels and was compliant during this quarter.

Second Quarter of 2018 - COMPLIANT

KZMM timely filed its second quarter 2018 children’s programming report on July 9, 2018 (FCC File Number: 0000056871). The report correctly indicates that the station broadcast an average of 3.0 hours per week of core programming on the primary channel (channel 22.3).

The report also correctly indicates that the average number of hours per week of free over-the-air digital video programming broadcast by the station on other than its main program stream was 840 hours, which represents five full-time multicast channels. The five multicast stations aired a total of 207.5 hours of core programming during the quarter. When divided by 5 stations over 13 weeks, this equals a average of 3.19 hours per week of core programming broadcast by the station on other than its main program stream. The 19.0 hour figure referenced in the report appears to be an inadvertent miscalculation. However, it is clear from the report that the station aired a sufficient amount of core programming on its multicast channels and was compliant during this quarter.

¹ As noted in the report, channel 22.1 went off-air on 2/14/2018. No programming was added to replace it. Channel 22.2 became the primary channel as of 1/1/2018. Accordingly, the report considers channel 22.1 to be a multicast channel for this quarter, and it is included in the total calculation of multicast hours for the six weeks of the quarter that channel 22.1 provided core programming before going off-air.

Third Quarter of 2018 - COMPLIANT

KZMM timely filed its third quarter 2018 children's programming report on October 10, 2018 (FCC File Number: 0000060828). The report indicates that the station broadcast an average of 3.5 hours per week of core programming on the primary channel (channel 22.3). However, the report inadvertently listed one core program, "Youth and Young Adults: Crossfire Youth Ministries (22.3)," as a qualified 30-minute core program which aired 14 times during the quarter. This was actually a 60-minute program that aired on Sundays from 7-8 am and should have been listed as such.² The total number of core programs aired on the primary channel in this quarter was 41 hours, not 34 hours, and accordingly an average of 3.15 hours per week of core programming aired on the primary channel in this quarter.

The report correctly indicates that the average number of hours per week of free over-the-air digital video programming broadcast by the station on other than its main program stream was 840 hours, which represents five full-time multicast channels. The five multicast stations aired a total of 236 hours of core programming during the quarter. When divided by 5 stations over 13 weeks, this equals a average of 3.63 hours per week of core programming broadcast by the station on other than its main program stream. The 15.73 hour figure referenced in the report appears to be an inadvertent miscalculation. However, it is clear from the report that the station aired a sufficient amount of core programming on its multicast channels and was compliant during this quarter.

Fourth Quarter of 2018 - COMPLIANT

KZMM timely filed its fourth quarter 2018 children's programming report on January 22, 2019 due to the federal government shutdown (FCC File Number: 0000067168). The report indicates that the station broadcast an average of 4.0 hours per week of core programming on the primary channel (channel 22.4). However, the report appears to miscalculate the total number of core program hours aired on the primary channel in this quarter, as it should have been 364 hours (123.5 + 123.5 + 117) which, when divided by 13 weeks, results in an average per week of 28.0 hours, not 4.0 hours.

The report correctly indicates that the average number of hours per week of free over-the-air digital video programming broadcast by the station on other than its main program stream was 840 hours, which represents five full-time multicast channels. The five multicast stations aired a total of 156 hours of core programming during the quarter. When divided by 5 stations over 13 weeks, this equals an average of 2.4 hours per week of core programming broadcast by the station on other than its main program stream. (The 30.0 hour figure referenced in the report appears to be an inadvertent miscalculation). Although the station was slightly deficient in its amount of core programming on its multicast channels, this was more than made up by the

² An amendment to the License Renewal Application (0000196092) is being concurrently filed to reflect this change.

substantial number of core program hours on the primary channel, and thus the station was compliant during this quarter.³

First Quarter of 2019 - COMPLIANT

KZMM timely filed its first quarter 2019 children's programming report on April 8, 2019 (FCC File Number: 0000069986). The report indicates that the station broadcast an average of 4.0 hours per week of core programming on the primary channel (channel 22.6), which appears to have been rounded up from 3.96 hours.

The report correctly indicates that the average number of hours per week of free over-the-air digital video programming broadcast by the station on other than its main program stream was 840 hours, which represents five full-time multicast channels. The report indicates that the multicast stations aired a total of 122.5 hours of core programming during the quarter. However, the report inadvertently omitted two core programs that aired on the multicast channels during this quarter. Specifically, Crossfire Youth Ministries, a 60-minute program, aired 13 times on channel 22.3 during the quarter, and Kid Zone, a 30-minute program, aired 130 times on channel 22.2 during the quarter.⁴ When these core programs are added to the total number of core program hours on the 5 multicast channels, the total was 200.5 hours which, when divided by 5 multicast channels over 13 weeks, equals an average of 3.08 hours per multicast channel, and thus the station was compliant with its core programming obligations on the 5 multicast channels.

Second Quarter of 2019 - COMPLIANT

KZMM timely filed its second quarter 2019 children's programming report on July 10, 2019 (FCC File Number: 0000077454). The report correctly indicates that the station broadcast an average of 3.0 hours per week of core programming on the primary channel (channel 22.3).

The report correctly indicates that the average number of hours per week of free over-the-air digital video programming broadcast by the station on other than its main program stream was 840 hours, which represents five full-time multicast channels. The report indicates that the multicast stations aired a total of 116.5 hours of core programming during the quarter.⁵ However, the report inadvertently omitted three core programs that aired on the multicast channels during this quarter. Specifically, Kids Time Praise, a 30-minute program, aired 52 times on channel

³ Moreover, according to HC2's records, the report inadvertently omitted two core programs that aired on the multicast channels. Specifically, Crossfire Youth Ministries, a 60-minute program, aired 13 times on channel 22.3 during the quarter, and Kid Zone, a 30-minute program, aired 130 times on channel 22.2 during the quarter. When these core programs are added to the total number of core program hours on the 5 multicast channels, the total was 234 hours which, when divided by 5 multicast channels over 13 weeks, equals an average of 3.6 hours per multicast channel, and thus the station was compliant outright with its core programming obligations on the 5 multicast channels.

⁴ An amendment to the License Renewal Application (0000196092) is being concurrently filed to reflect this change.

⁵ The 9.0 hour figure referenced in the report appears to be an inadvertent miscalculation.

22.4 during the quarter; Kid Zone, a 30-minute program, aired 130 times on channel 22.2 during the quarter; and Tiny Tots for Jesus, a 30-minute program, aired 52 times on channel 22.4 during the quarter.⁶ When these core programs are added to the total number of core program hours on the 5 multicast channels, the total was 233.5 hours which, when divided by 5 multicast channels over 13 weeks, equals an average of 3.59 hours per multicast channel, and thus the station was compliant with its core programming obligations on the 5 multicast channels.

Third Quarter of 2019 - COMPLIANT

For the Third Quarter of 2019 (through September 15, 2019, when the FCC's core processing guidelines changed to an annual reporting requirement), KZMM timely filed its children's programming report on October 9, 2019 (FCC File Number: 0000085120). The report correctly indicates that the station broadcast an average of 3.0 hours per week of core programming on the primary channel (channel 22.3) over the 11 weeks of this shortened quarter.

The report correctly indicates that the average number of hours per week of free over-the-air digital video programming broadcast by the station on other than its main program stream was 840 hours, which represents five full-time multicast channels. The report indicates that the multicast stations aired a total of 143.0 hours of core programming during the quarter which, when divided by 5 multicast channels over 11 weeks, equals an average of 2.6 hours per multicast channel.⁷ Although this represents a minor deficiency of 0.4 hours, that deficiency is eliminated by using 0.4 hours of the average extra 0.59 hours from the previous quarter, and thus the station was compliant with its core programming obligations on the 5 multicast channels.

KZMM also has been compliant with the core programming requirements as reported in its 2019 annual report and continuing through to the recently filed 2023 annual report.

⁶ An amendment to the License Renewal Application (0000196092) is being concurrently filed to reflect this change.

⁷ The 13.0 hour figure referenced in the report appears to be an inadvertent miscalculation.