

## **JANUARY 2020**

The licensee believes that the commercial limits certification included in the 3<sup>rd</sup> quarter 2019 Form 398 covers the programming for the entire quarter for commercial limits purposes. However, in an abundance of caution and to the extent necessary, the licensee has also included programming under the new E/I rules from the end of the 3<sup>rd</sup> quarter 2019 in its separate 4<sup>th</sup> quarter 2019 commercial limits certification.