

PROGRAMMER QUARTERLY CLOSED CAPTIONING CERTIFICATION

Per Federal Communications Commission (FCC) rule 79.1(b), 47 C.F.R. § 79.1(b),

Capital District Regional Off Track Betting Corp. ("Program Network") hereby certifies that during the quarter commencing April 1, 2018 and ending June 30, 2018, i.e., 2nd quarter 2018, either:

☐ Program Network's programming satisfies the FCC's caption requirements set forth in 47 C.F.R. § 79.1(b); or

☒ Program Network is exempt from the FCC captioning requirements pursuant to one or more of the following exemptions:

☒ Program Network is exempt because it has per channel annual revenue less than \$3 million;

☐ Program Network is a "new network" under FCC rules because it has been in operation for less than four years;

☐ Program Network has received an undue burden waiver from the FCC specifically exempting its programming;

☐ Program Network's programming consists primarily of a foreign language other than Spanish that is not scripted and therefore cannot be captioned using the electronic newsroom technique;

☐ Program Network's programming consists primarily of non-vocal music;

☐ Program Network's programming is non-news, locally produced and either of local public interest with no repeat value for which the electronic newsroom technique is not available or is instructional programming for use in schools.

I certify that I have been designated Program Network as the official responsible for oversight of compliance with the FCC's closed captioning requirements and hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 19 day of July 2018

Signature 

PROGRAMMER CAPTION QUALITY CERTIFICATION

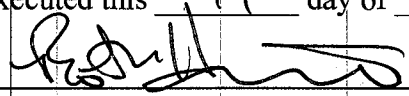
Per Federal Communications Commission (FCC) rule 79.1(j), 47 C.F.R. § 79.1(j),

Capital District Regional Off-Track Betting Corp. ("Program Network") hereby certifies that either:

- ☐ Program Network's programming satisfies the FCC's caption quality standards set forth in 47 C.F.R. § 79.1(j)(2) pertaining to accuracy, synchronicity, completeness and placement; or
- ☐ Program Network, in the ordinary course of business, has adopted and follows the Best Practices set forth in 47 C.F.R. § 79.1(k)(1); or
- ☒ Program Network is exempt from the FCC captioning requirements pursuant to one or more of the following exemptions:
 - ☒ Program Network is exempt because it has per channel annual revenue less than \$3 million;
 - ☐ Program Network is a "new network" under FCC rules because it has been in operation for less than four years;
 - ☐ Program Network has received an undue burden waiver from the FCC specifically exempting its programming;
 - ☐ Program Network's programming consists primarily of a foreign language other than Spanish that is not scripted and therefore cannot be captioned using the electronic newsroom technique;
 - ☐ Program Network's programming consists primarily of non-vocal music;
 - ☐ Program Network's programming is non-news, locally produced and either if of local public interest with no repeat value for which the electronic newsroom technique is not available or is instructional programming for use in schools.

I certify that I have been designated Program Network as the official responsible for oversight of compliance with the FCC's closed captioning requirements and hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 19 day of July 2019


Signature

Robert W. Hensworth
Name (Print)

Vice President of Legal Affairs / General Counsel
Title

CHILDREN'S PROGRAMMING CERTIFICATION

2nd Quarter: April 1, 2018 to June 30, 2018

This is to certify that the list set forth below identifies all programs and series transmitted during the above referenced calendar quarter that were originally produced and broadcast primarily for an audience of children 12 years old and under. As a standard practice, we formatted and aired each of the children's programs and series identified below so that the total commercial time (including local ad avails, promos for non-educational programs and adjacent ads running before or after the program within the same clock hour) did not exceed 10.5 minutes per hour on weekends, and 12 minutes per hour on weekdays, in compliance with the Children's Television Act of 1990 and the rules and regulations of the Federal Communications Commission (the "FCC").

None of the following programs or series included any commercial spots including local ad avails, promos for non-educational programs and adjacent ads running before or after the program within the same clock hour that contained references to, characters or actors from, or that offered products related to, the underlying program or series. Any instances in which the children's programming commercial limits were exceeded during the referenced calendar quarter are explained in detail below. I further certify that I have been designated by Capital District Legal Off-Track Betting Corp the official responsible for oversight of compliance with the FCC children's programming commercial limits, and I am familiar with the Regulations.

List children's programs run during calendar quarter:

Please note that on April 9, 2007, a representative of the FCC confirmed to a Capital OTB representative that cable networks are not required to air children's programming as such Capital OTB is exempt from airing programming in response to the Children's Television Act of 1990.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 19 day of July 2018.

Signature

Robert W. Hensworth

Name (Print)

Vice President of Legal Affairs / General Counsel

Title

CALM Act Certification

Per Federal Communications Commission (FCC) rule 47 C.F. R. §§ 73.682(e) and 76.607(a), Capital District Regional Off-Track Betting Corp. ("Program Network") hereby certifies that it is in compliance with the loudness control practices contained in Advanced Television Systems Committee (ATSC) A/85 RP: Recommended Practice: Techniques for Establishing and Maintaining Audio Loudness for Digital Television ("ATSC A/85 RP Recommended Practice").

I certify that I have been designated by the Program Network as the official responsible for oversight of compliance with the FCC's CALM Act requirements and hereby declare under penalty of perjury that the foregoing is true and correct.

Compliance with the ATSC A/85 RP Recommended Practice is determined by the use of equipment and associated software that is installed, utilized and maintained in commercially reasonable manner.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed this 19 day of July 2018.



Signature

Robert W. Hensworth

Name (Print)

Vice President of Legal Affairs / General Counsel

Title