

## EXHIBIT 19

### Children's Programming Commercial Limits

The Commission's rules and policies regarding children's programming restrict the amount of commercial matter that may air during programs intended for children twelve years old and under. Meredith Corporation ("Meredith") is keenly aware of these rules and policies and of their importance. Accordingly, all of KPDX(TV)'s programming staff are involved in ensuring that the station complies with these rules at all times, and a constant dialogue is maintained between the station's staff and communications counsel regarding these matters.

Nevertheless, on Monday, January 27, 2003, at approximately 3:09pm, KPDX(TV) began to air a commercial advertisement promoting Buzz Lightyear fruit snacks during the broadcast of "Buzz Lightyear." The station's master control operator immediately stopped the broadcast of the advertisement before it concluded. The incident prompted an immediate investigation involving station management, master control, traffic, and sales personnel. This investigation revealed that the commercial had been coded incorrectly by its supplier, and the station's pre-broadcast review failed to detect the error. The investigation also revealed that KPDX(TV) had previously aired the same commercial during a "Buzz Lightyear" episode on Friday, December 20, 2002. At the conclusion of this investigation, Meredith instituted a number of new policies to guard against errors of this kind in the future. These new policies included additional pre-broadcast review by both master control and central traffic operations.

Meredith believes that its remedial efforts have proven successful. In over three and a half years since the isolated incidents described above, KPDX(TV) has experienced no program length commercials. Meredith believes that the isolated incidents described herein will not recur at KPDX(TV).

## Isolated Violation

On Monday, January 27, 2003, at approximately 3:09PM PST, KPDX briefly violated the FCC's commercial limits in children's programming. Specifically, during the broadcast of "Buzz Lightyear," KPDX inadvertently began to broadcast the General Mill commercial advertisement "The Heist" (GIDD2232), which promoted a Buzz Lightyear fruit snack and therefore was related to the program "Buzz Lightyear." The Master Control Operator on duty immediately noticed the violation and manually stopped KPDX's broadcast of the advertisement before it concluded.

The Master Control Operator alerted station management about this matter. KPDX's General Manager immediately investigated the matter and contacted Meredith Corporation's associate general counsel, who in turn contacted the company's outside FCC counsel. The following describes the results of that investigation.

KPDX has in place the following procedures to ensure compliance with the children's television programming requirements:

1. Orders to purchase commercial time are placed by advertising agencies according to the promotional campaign name and sent to KPDX by the television station's national rep firm. The advertising agency responsible for supplying the commercial material provides the television station with a set instructions containing the campaign name, name and code of the specific commercials(s) to air, period of dates the instructed commercials should air, and in some cases a list of any animated and/or program identifiable characters contained within the commercial(s).
2. The Sales Assistant reviews and approves all orders. He or she notes any program restrictions that apply to a particular commercial and then enters the order, along with its program restrictions, in the station's traffic computer system.
3. A Traffic Assistant reviews the commercial instructions supplied by the advertising agency (as mentioned above in point 1) and verifies that the traffic computer system correctly identifies the program restrictions noted in the commercial instructions.
4. The Traffic Manager and Central Traffic Operations finalize the placement of the commercial into the traffic system, paying special attention to program restriction codes to ensure compliance with host selling and commercial limits rules. The commercial is then logged to air in the traffic computer system.
5. A Master Control Operator reviews a commercial for technical quality and for identifiable children's characters as he or she makes a physical copy of the commercial for use on our air.

KPDX believes that the prior systems in place combined with the new procedures will prove to be effective in ensuring compliance with the children's rules. KPDX notes that it has taken prompt action, with assistance from counsel, to investigate the January 27th incident fully and to prepare this detailed statement for the public file. In addition, station management has reviewed the host selling and commercial limits rules with all appropriate station staff, including those responsible for maintaining show formats in the traffic computer system.

Consequently, KPDX believes that the incidents described herein will not recur.