

Children's TV Commercial Limits Certifications

The undersigned has instituted a thorough search of the station files and reports as follows:

1. Q4 - 2018. In 2018, the certifications were still required to be placed in the station public file on a quarterly basis. The Q4 certification was placed in the file on January 10, 2019 as required. See attached.

2. Q1 - 2019. The certifications were due on a quarterly basis and they were placed in the public file on April 10, 2019. See Attached.

3. Q2 - 2019. The Q2 Certification was due to be placed in the public file by July 10, 2019. The Certification is attached.

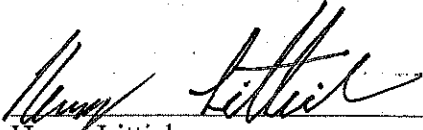
4. Q3 - 2019. Under the quarterly filing regimen, the Q3 Certification was due to be placed in the public file by October 10, 2019. Station records show that in August 2019 the Commission changed the rules governing the filing schedule for Commercial Limits Certifications from a quarterly basis to an annual basis with an effective date of 09/16/2019.

5. 2020-2021. It appears that the Rule change to an annual filing rather than a quarterly filing, and an unexpected simultaneous staff shake-up created a hectic situation at the station and caused some confusion about record-keeping responsibilities. The Commercial Limits Certifications had been handled by the then station Controller because the Traffic department was under his direction at that time. Unfortunately, the then Controller left the station suddenly (in one day) and there was no transition period under which his Certification responsibilities were passed on to someone else. Outside accountants had to be brought in on a temporary basis for the bookkeeping and other financial duties. But, the responsibility for Commercial Limits Certifications apparently got lost in the shuffle. Children's Programming Reports were under a different department and were filed albeit with some done on an untimely basis. We were unable to locate and hire a qualified replacement for the Comptroller position until late September.

The undersigned holds himself responsible for the shortcomings listed above because I should have realized that the Controller had other duties than financial responsibilities. A review of the station records did not find any instance where WHIZ-TV exceeded the Commercial Limits in Children's Programming.

The undersigned is reviewing the staff assignments and will institute a new public file duty roster to ensure that the short-coming will not be repeated.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Henry Littick", written over a horizontal line.

Henry Littick
President/General Manager

Date: 4-6-2022