



A TimeWarner Company

Turner Network Sales, Inc.
101 Marietta Street NW, 21st Floor
Atlanta, GA 30303-2720
T 404.827.2250

January 8, 2015

Re: Certificates of Compliance for the Children's Television Act of 1990

Dear Affiliate:

As of January 1, 1992, the Federal Communications Commission's rules ("FCC Rules") implementing the Children's Television Act of 1990 ("Act") require cable operators to maintain certain records regarding their compliance with advertising limits imposed on children's television programming. Accordingly, Turner Network Sales, Inc. provides the attached Turner Entertainment Networks' certificates of compliance for 4th Quarter 2014. Please note that the Act's advertising limits are inapplicable to CNN, Headline News, Turner Classic Movies, TNT, TruTV, CNNI, and CNNE as these networks do not carry children's programming. If there are any changes in the programming policies of these networks, we will provide you with updated certifications reflecting such changes.

To comply with the FCC Rules, please place the attached certificates of compliance in your system's public file(s) no later than the tenth day of the current quarter following the quarter in which the programming aired.

Sincerely,

A handwritten signature in black ink that reads "Sherry A. Kangalee". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Sherry A. Kangalee
Contracts Administrator

**CARTOON NETWORK
CERTIFICATE OF COMPLIANCE WITH COMMERCIAL LIMITS
FOR CHILDREN'S PROGRAMMING**

I, Toni Millner, in my capacity as Assistant General Counsel for Turner Broadcasting System, Inc. ("Turner"), hereby certify to the best of my information, knowledge, and belief, that the following information is accurate for the period from October 1, 2014 to December 31, 2014:

- 1) I am familiar with the statutory limits of the Children's Television Act of 1990 (the "Act") and the FCC regulations implementing those limits (no more than 12 minutes per hour of commercial matter may be telecast during children's programming* on weekdays, and no more than 10 ½ minutes per hour on weekends).
- 2) From October 1, 2014 to December 31, 2014, Turner treated all of the programs telecast on the Cartoon Network, a 24-hour program service, as "children's programming" for the purposes of the commercial limits set forth in the Act, except for its telecast in the "Adult Swim" block of programming created for an adult audience that airs late night seven days a week.** The Adult Swim block contains hourly warnings to notify and remind viewers that the content is intended for an adult audience, and is not considered "children's programming" subject to the commercial limits set forth in the Act. On a weekly basis, therefore, approximately 98 hours of television programming were treated as "children's programming" for the purposes of the commercial limits set forth in the Act.
- 3) Turner has, as a standard practice, formatted and telecast all of the programs carried on the Cartoon Network during the period noted above within the commercial limits set forth in the Act, to the extent applicable to the programming. These practices were closely followed except only for the following inadvertent incident involving the improper placement of a commercial.
- 4) An advertisement for a product related to a program was inadvertently placed within the commercial break of the related programming on December 7, 2014. A more detailed account of this incident is attached as Exhibit 1. This incident was the result of unintentional, human error.
- 5) Cartoon Network regrets this incident, which Cartoon Network proactively investigated and reported. Moreover, we urge that they be viewed in the context of the large amount of children's programming that Cartoon Network has telecast this period without incident and in full compliance with the KidVid rules and regulations.

Certified by me this 5th day of January, 2015.



Toni Millner
Assistant General Counsel and
Vice President - Kid Vid Compliance
Turner Broadcasting System, Inc.

* "Children's programming" for the purposes of the commercial limit means "programs originally produced and broadcast primarily for an audience of children 12 years and under."

**During this period, the "Adult Swim" block of programming aired from 8 p.m. to 6 a.m., 7 nights a week.

Exhibit 1 –to Cartoon Network’s KidVid Certificate of Compliance – 2014, 4th Quarter

During this quarter, there was one incident in which an advertisement for a product was placed within the commercial break of related programming due to unintentional human error.

The advertisement at issue was a 30-second commercial for a video game rental subscription service called Gamefly.com. The end of the commercial included a dozen images with a variety of games available on the online service, including a quick image of a game featuring Sonic Boom characters. This advertisement inadvertently was telecast in a commercial break of the Sonic Boom series airing on Cartoon Network at approximately at 6:27 a.m., Sunday, December 7, 2014.

Cartoon Network’s compliance process to ensure that advertisements do not contain characters from adjacent television programs is a manually intensive process that involves the daily review of a high volume of advertisements and multiple personnel. Unfortunately, a mistake was made on this one occasion. Although the KidVid personnel had correctly coded the commercial to identify the spot as containing program-related elements and request a log change to move the commercial to a different time of day in accordance with Cartoon Network’s KidVid compliance procedures, the weekend personnel in the Control Room inadvertently failed to make the log change request to move the commercial away from related programming.

The personnel involved appreciate the importance of the KidVid rules and procedures, but simply made a mistake. KidVid refresher training has been conducted one on one with each operator to reinforce full compliance with these practices.

**BOOMERANG
CERTIFICATE OF COMPLIANCE WITH COMMERCIAL LIMITS
FOR CHILDREN'S PROGRAMMING**

I, Toni Millner, in my capacity as Assistant General Counsel for Turner Broadcasting System, Inc. ("Turner"), hereby certify to the best of my information, knowledge, and belief, that the following information is accurate for the period of October 1, 2014 to December 31, 2014:

- 1) I am familiar with the statutory limits of the Children's Television Act of 1990 (the "Act") and the FCC regulations implementing those limits (no more than 12 minutes per hour of commercial matter may be telecast during children's programming* on weekdays, and no more than 10 ½ minutes per hour on weekends).
- 2) Since its launch, Turner has treated all of the programs telecast on Boomerang as "children's programming" for the purposes of complying with the commercial limits set forth in the Act.
- 3) Turner has, as a standard practice, formatted and telecast all of the programs carried on the Cartoon Network during the period noted above within the commercial limits set forth in the Act, to the extent applicable to the programming. These practices were closely followed.
- 4) To the best of my information, knowledge and belief, there were no instances in which the commercial limits were exceeded during the period noted above.

Certified by me this 5th day of January, 2015.



Toni Millner
Assistant General Counsel and
Vice President - Kid Vid Compliance
Turner Broadcasting System, Inc.

* "Children's programming" for the purpose of the commercial limits means programs originally produced and telecast for an audience of children 12 years and under.

TBS
CERTIFICATE OF COMPLIANCE WITH
COMMERCIAL LIMITS FOR CHILDREN'S PROGRAMMING

I, Toni Millner, in my capacity as Assistant General Counsel for Turner Broadcasting System, Inc. ("Turner"), hereby certify that for the period from October 1, to December 31, 2014:

- 1) I am familiar with the statutory limits of the Children's Television Act of 1990 (the "Act") and the FCC regulations implementing those limits (no more than 12 minutes per hour of commercial matter may be broadcast during children's programming* on weekdays, and no more than 10 ½ minutes per hour on weekends).
- 2) As a standard practice, Turner formats any children's programming (as defined under the Act) within the commercial limits set forth in the Act to the extent the FCC regulations are applicable to the programming.
- 3) To the best of my information, knowledge, and belief, no children's programming aired in the period noted above on TBS with the exception of one program, *Dr. Seuss' How the Grinch Stole Christmas*
- 4) To the best of my information, knowledge, and belief, TBS aired the holiday program, *Dr. Seuss' How the Grinch Stole Christmas*, two times in November and formatted the program within the commercial limits set forth with the Act.

Certified by me this 5th day of January, 2015.



Toni Millner
Assistant General Counsel and
Vice President—Kid Vid Compliance
Turner Broadcasting System, Inc.

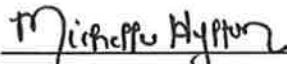
***Children's programming** for the purpose of the commercial limits means programs originally produced and telecast for an audience of children 12 years old and under.

WPCH-TV
CERTIFICATE OF COMPLIANCE WITH COMMERCIAL LIMITS
FOR CHILDREN'S PROGRAMMING

I, Michelle Hylton, in my capacity as Vice President—FCC Compliance for Superstation Inc., hereby certify that for the period from October 1, 2014 to December 31, 2014:

- 1) I am familiar with the statutory limits of the Children's Television Act of 1990 (the "Act") and the FCC regulations implementing those limits (no more than 12 minutes per hour of commercial matter may be broadcast during children's programming* on weekdays, and no more than 10 1/2 minutes per hour on weekends).
- 2) A true and correct list of children's programming aired on WPCH-TV during the period noted above is attached as Exhibit 1. The children's programs listed in Exhibit 1 were formatted and aired within the statutory limits of the Act.
- 3) To the best of my information, knowledge, and belief, there were no instances in which the commercial limits were exceeded during the period noted above.

Certified by me this 7th day of January, 2015.



Michelle Hylton
Vice President—FCC Compliance
Superstation, Inc.

* Although WPCH generally does not air programming subject to the commercial limits (i.e., programming directed to an audience of children who are 12 years of age or younger), it traditionally has followed the commercial limits for its children's educational programming, even when such programming may serve audiences from 13-16 years of age. In that regard and consistent with past calendar quarters, WPCH is filing this quarterly certification.

Exhibit 1

List of WPCH-TV Children's Programming/Commercial Load Local

October 4, 2014 to December 27, 2014

Time Period	Program Title	Maximum # Commercial Minutes/Hour
Sundays 7:00am – 10:00am		10 ½ Min.
7:00am – 7:30am	Dog Tails	
7:30am – 8:00am	Animal Rescue	
8:00am – 8:30am	Dragonfly TV	
8:30am – 9:00am	Think Big	
9:00am – 9:30am	On the Spot	
9:30am – 10:00am	The Coolest Places On Earth	
