

Kerry Brockhage
EVP & Chief Counsel, Content Distribution
30 Rockefeller Plaza - 1221 Campus
New York, NY 10112
kerry.brockhage@nbcuni.com

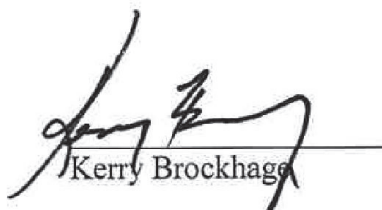
NBCUniversal

October 4th, 2019

**RE: Certification of Compliance with Children's Television Act 1990
Q3-2019 – FCC Rules 76.225 & 76.1703**

This is to certify that the NBCUniversal programming services currently known as BRAVO, CNBC, CNBC World, E!, GOLF, MSNBC, NBCSN, OLYMPICS Channel, OXYGEN, SYFY, UNIVERSO, & USA NETWORK (and any high definition simulcast of such networks), as a standard practice, do not format or air any programs and/or series specifically designed for children 12 and under, and, therefore, are in compliance with the commercial time limitations of the Children's Television Act of 1990 for the Third Quarter of 2019.

We will notify you if and when this practice changes, as required. I hereby certify that the foregoing is true and correct. Executed on this 4th day of October 2019.


Kerry Brockhage

NETWORK'S NAME: NFL Network & RedZone

Address: One NFL Plaza
Mt. Laurel, NJ 08054

CHILDRENS PROGRAMMING CERTIFICATION

This notice confirms that, for the period commencing on July 1, 2019 and ending on September 30, 2019:

1. NFL RedZone did not include programming originally produced for an audience of children 12 years old and younger.
2. All NFL Network programming originally produced for an audience of children 12 years old and younger complied in all respects (to the extent applicable to Network) with the commercial matter limitations of the Children's Television Act of 1990, Public Law 101-437 (October 18, 1990) and the regulations of the FCC promulgated thereunder from time-to-time.

I hereby declare that the foregoing is true and correct.

Signature: 

Name: Arias Massaro

Title: Director NFL Network Affiliate Sales

Date: October 4, 2019

CHILDREN'S PROGRAMMING CERTIFICATE

The National Geographic Channel hereby certifies that it was in compliance with the Children's Television Act of 1990 and the implementing rules and regulations of the Federal Communications Commission during the third quarter of 2019.

Dated: _____

9/11/19

A handwritten signature in black ink, appearing to read 'Geoff Daniels', written over a horizontal line.

Geoff Daniels
Executive Vice President
Global Unscripted Entertainment

CHILDREN'S PROGRAMMING CERTIFICATE

Nat Geo WILD hereby certifies that it was in compliance with the Children's Television Act of 1990 and the implementing rules and regulations of the Federal Communications Commission during the third quarter of 2019.

Dated: 9/11/19


Geoff Dangel
Executive Vice President
Global Unscripted Entertainment



CLOSED CAPTIONING AND CHILDREN'S PROGRAMMING CERTIFICATION
THIRD QUARTER 2019 (July 1, 2019 THROUGH September 30, 2019)

This is to certify that Outdoor Channel ("Network") is in compliance with the closed captioning requirements set forth in Section 79.1, *et seq.*, of Title 47 of the Code of Federal Regulations (the "Regulations"), and that all programming provided by Network to each Affiliate during the 3rd Quarter of 2019 was, to the best of Network's knowledge and belief, captioned to the extent required by such Regulations. Further, pursuant to Section 79.1(j)(1) of the Regulations, Network hereby certifies that in the ordinary course of business, it has adopted and follows Best Practices set forth in Section 79.1(k)(1) thereof.

This is to further certify that Network does not currently contain any children's programming as defined under 47 CFR 76.225 of the rules and regulation of the Federal Communications Commission (the "Children's Programming Rules"). In the event that the Network includes any children's programming on its schedule after the date hereof, Network will provide in writing, by the tenth day following the end of the calendar quarter in which such children's programming is added, a description of such programming specifying the dates and time of transmission and the duration of the "commercial matter" included therein.

I certify that I have been designated by Network as the official responsible for the oversight of compliance with the Regulations and the Children's Programming Rules, and I am familiar with the Regulations and the Children's Programming Rules. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30th day of September 2019

Network: Outdoor Channel

A handwritten signature in blue ink, appearing to read "Steve Smith", is written over a horizontal line.

By: Steve Smith
EVP Distribution & Affiliate Marketing



September 30th, 2019

Re: 3rd Quarter Children's Programming Certification

To Whom It May Concern:

This letter is to certify that Outside Television is in full compliance with the provisions of the Children's Television Act of 1990 and the rules and regulations of the Federal Communications Commission promulgated there under for the 3rd quarter of 2019.

Specifically, Outside Television did not broadcast any children's programming during the 3rd quarter of 2019.

I declare under penalty of perjury that the foregoing is true and correct. This certification was executed on the 30th day of September.

Sincerely,

A handwritten signature in black ink, appearing to be "RF" or "Rob Faris".

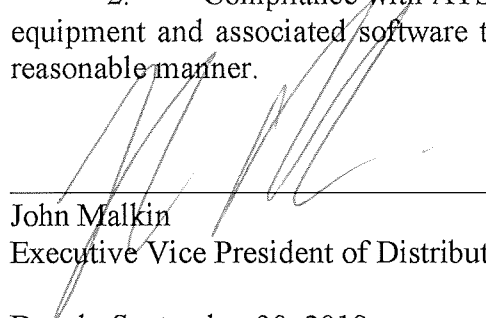
Rob Faris
SVP Programming & Production
Outside TV
33 Riverside Ave., 4th Floor
Westport, CT 06880

CALM ACT CERTIFICATION

This is to certify on behalf OVATION that:

1. As required by the Commercial Advertisement Loudness Mitigation Act of 2010 (the "CALM Act"), codified at 47 U.S.C. § 621, and implementing regulations adopted by the Federal Communications Commission at 47 C.F.R. § 76.607, all commercial advertisements embedded in programs carried on OVATION are in compliance with the audio loudness practices contained in Advanced Television Systems Committee A/85, ATSC Recommended Practice: Techniques for Establishing and Maintaining Audio Loudness for Digital Television (July 25, 2011) ("ATSC A/85 RP") at the point of distribution by OVATION to authorized reception equipment of downstream multichannel video programming distributors.

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



John Malkin
Executive Vice President of Distribution

Dated: September 30, 2019

21st CENTURY COMMUNICATIONS AND VIDEO ACCESSIBILITY ACT OF 2010
CERTIFICATION

Third Quarter 2019 (July 1 – September 30, 2019)

This is to certify that all programming provided by OVATION during the period of July 1, 2019 through September 30, 2019, is in compliance with the 21st Century Communications and Video Accessibility Act of 2010 and implementing regulations adopted by the Federal Communications Commission at 47 C.F.R. §§ 79.3 and 79.4, to the extent that those regulations are applicable to OVATION.

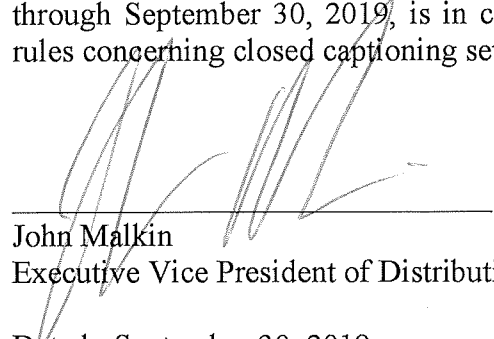


John Malkin
Executive Vice President of Distribution

Dated: September 30, 2019

CLOSED CAPTIONING CERTIFICATION
Third Quarter 2019 (July 1 – September 30, 2019)

This is to certify that all programming provided by OVATION during the period of July 1, 2019 through September 30, 2019, is in compliance with the Federal Communications Commission rules concerning closed captioning set forth at 47 C.F.R. § 79.1.



John Malkin
Executive Vice President of Distribution

Dated: September 30, 2019

CHILDREN'S PROGRAMMING CERTIFICATION

Third Quarter 2019 (July 1 – September 30, 2019)

This is to certify that it is OVATION's standard practice to format and air children's programming in compliance with the Children's Television Act of 1990, codified at 47 U.S.C. § 303a (the "Act"), and the Federal Communications Commission rules implementing the Act, including 47 C.F.R. §§ 76.225 and 76.1700.

During the period of July 1 through September 30, 2019, Ovation did not air any children's programming.



John Malkin
Executive Vice President of Distribution

Dated: September 30, 2019





October 1, 2019

Dear Affiliate:

In response to your recent request, this is to certify that QVC, Inc. ("QVC"), during the calendar quarter ending September 30, 2019:

- 1) provided closed captioning services on its QVC, QVC2 and QVC3 services delivered to you in compliance with the applicable closed captioning regulations of the Federal Communications Commission ("FCC"); and
- 2) had no programs originally produced or broadcast primarily for an audience of children 12 years old and under. Accordingly, none of QVC's programming during such quarter constituted "children's programming" as defined by Section 76.225 or 73.670, as applicable, of the FCC's rules, and, therefore, none was subject to the commercialization limits imposed on children's programming (see 47 C.F.R., Section 76.225 or 73.670, as applicable). To the extent we should decide, in the future, to include any children's programming on our schedule, we would, of course, comply with all pertinent FCC requirements and would, at that time, notify you of the programming change.

Please be advised that because the CALM Act certification and the certification for adherence to the closed captioning quality "Best Practices" for Video Programmers (47 C.F.R. § 79.1(k)(1)) are required to be "widely available" in accordance with FCC rules, we have posted those certifications on the website of our subsidiary, Affiliate Distribution & Mktg., Inc. Accordingly, you may find our CALM Act and closed captioning quality certifications at <http://www.adm.qvc.com/forms.html>.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

Joseph Micucci
Vice President – Global Engineering
Broadcast Leadership

cc: David Apostolico
Gina Daleandro

QVC STUDIO PARK

1200 Wilson Drive ■ West Chester PA 19380-4262 ■ 484.701.1000 ■ QVC.com



September 30, 2019

This letter is intended to assist The Cowboy Channel affiliates in satisfying their obligations with the Federal Communications Commission's Television Regulations. The Cowboy Channel hereby certifies that:

1. ☐ All programming provided during this past calendar quarter, ending September 30, 2019, was in compliance with the Federal Communications Commission's Children's Television Regulations (including, without limitation, regulations regarding the display of website addresses and/or "host selling" activities "Children's TV Rules").
- OR
2. ☒ The Cowboy Channel is not required to comply with the Children's TV Rules with respect to the Service because (please explain): The Cowboy Channel doesn't carry children's programming at this time. The Cowboy Channel agrees that it will notify affiliates within thirty (30) days of a change in the compliance with the Children's TV Rules.

Sincerely yours,

Patrick Gottsch
President



September 30, 2019

This letter is intended to assist RFD-TV affiliates in satisfying their obligations with the Federal Communications Commission's Television Regulations. RFD-TV hereby certifies that:

1. X All programming provided during this past calendar quarter, ending September 30, 2019, was in compliance with the Federal Communications Commission's Children's Television Regulations (including, without limitation, regulations regarding the display of website addresses and/or "host selling" activities "Children's TV Rules").

OR

2. RFD-TV is not required to comply with the Children's TV Rules with respect to the Service because (please explain):

_____. RFD-TV agrees that it will notify affiliates within thirty (30) days of a change in the compliance with the Children's TV Rules.

Sincerely yours,

Patrick Gottsch
President





Showtime Networks Inc.
A CBS COMPANY

1633 Broadway
New York, NY 10019
212.708.1600

SHOWTIME NETWORKS INC.

SECTION 79.1(j)(1) CLOSED CAPTIONS QUALITY CERTIFICATION

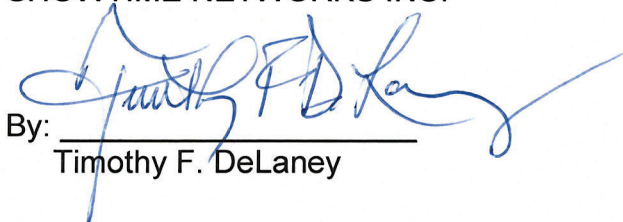
Pursuant to Section 79.1(j)(1) of the rules of the Federal Communications Commission ("FCC Rules"), 47 C.F.R. § 79.1(j)(1), Showtime Networks Inc. ("SNI") hereby certifies that in the ordinary course of business, SNI has adopted and follows the Best Practices set forth in Section 79.1(k)(1) of the FCC Rules.

The programming services of SNI include: Showtime, The Movie Channel, and Flix and all multiplexed and other versions of such services including Showtime 2, Showtime Showcase, Showtime Extreme, Showtime Beyond, Showtime Next, Showtime Women, Showtime Family Zone, The Movie Channel Xtra, Showtime on Demand, The Movie Channel on Demand, and Flix on Demand (including standard definition and/or high definition versions, and time-zone shifted versions, of the foregoing).

This certification may also be seen by going to SHO.com and clicking on the [Closed Captioning](#) link at the bottom of the home page.

This Certification shall remain in effect unless and until it is withdrawn or replaced with a subsequent certification.

SHOWTIME NETWORKS INC.

By: 
Timothy F. DeLaney

SVP, Network Operations
1633 Broadway
New York, NY 10019

April 18, 2019

Michael L. Ward
Senior Vice President
Deputy General Counsel



October 15, 2019

Showtime Networks Inc.

A CBS COMPANY

1633 Broadway
New York, NY 10019
212.708.3279
212.708.1391 Fax
michael.ward@showtime.net

Via email: amunna@atmc.com
Angela Munna
Regulatory Assistant
Custodian of Records &
Subpoea Compliance
ATMC

Dear Ms. Munna:

In response to your email, this letter shall confirm that Showtime Networks is in compliance with the closed-captioning requirements of the Telecommunications Act of 1996 for the third quarter of 2019. With regards to the Children's Television Act of 1990, SHOWTIME does not contain any advertising.

If I can be of any further assistance, please let me know.

Sincerely,

A handwritten signature in blue ink, reading "Michael L. Ward". The signature is fluid and cursive, with the first name "Michael" and last name "Ward" clearly legible.



CLOSED CAPTIONING AND CHILDREN'S PROGRAMMING CERTIFICATION
THIRD QUARTER 2019 (July 1, 2019 THROUGH September 30, 2019)

This is to certify that Sportsman Channel ("Network") is in compliance with the closed captioning requirements set forth in Section 79.1, *et seq.*, of Title 47 of the Code of Federal Regulations (the "Regulations"), and that all programming provided by Network to each Affiliate during the 3rd Quarter of 2019 was, to the best of Network's knowledge and belief, captioned to the extent required by such Regulations. Further, pursuant to Section 79.1(j)(1) of the Regulations, Network hereby certifies that in the ordinary course of business, it has adopted and follows Best Practices set forth in Section 79.1(k)(1) thereof.

This is to further certify that Network does not currently contain any children's programming as defined under 47 CFR 76.225 of the rules and regulation of the Federal Communications Commission (the "Children's Programming Rules"). In the event that the Network includes any children's programming on its schedule after the date hereof, Network will provide in writing, by the tenth day following the end of the calendar quarter in which such children's programming is added, a description of such programming specifying the dates and time of transmission and the duration of the "commercial matter" included therein.

I certify that I have been designated by Network as the official responsible for the oversight of compliance with the Regulations and the Children's Programming Rules, and I am familiar with the Regulations and the Children's Programming Rules. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30th day of September 2019

Network: Sportsman Channel

A handwritten signature in blue ink, appearing to read "Steve Smith", is written over a horizontal line.

By: Steve Smith
EVP Distribution & Affiliate Marketing

1000 Chopper Circle, Denver CO 80204


www.TheSportsmanChannel.com

**STARZ ENTERTAINMENT, LLC'S
CHILDREN'S PROGRAMMING CERTIFICATE**

Starz Entertainment, LLC is the owner and operator of the following programming channels distributed by cable television systems: Starz, Starz Cinema, Starz Comedy, Starz Edge, Starz InBlack, Starz Kids & Family, Starz On Demand, StarzEncore, StarzEncore Action, StarzEncore Black, StarzEncore Classic, StarzEncore Español, StarzEncore Family, StarzEncore Suspense, StarzEncore Westerns, StarzEncore On Demand, MoviePlex, MoviePlex On Demand, IndiePlex and RetroPlex. This is to certify that, for the period from July 1, 2019 through September 30, 2019, the foregoing channels, which are all commercial-free premium channels, did not contain any "commercial matter" during any children's programming that was aired on such channels. See 47 CFR §76.225.

I hereby declare that the foregoing is true and correct. Executed this 1st day of October, 2019.

STARZ ENTERTAINMENT, LLC

By: 

Todd Hoy
Senior Vice President
Business & Legal Affairs – Distribution

Certification of Compliance: FCC Children's Television Requirements
July 1, 2019 through September 30, 2019

On behalf of the Trinity Broadcasting Network (TBN), this is to certify that the program services named below comply with the FCC's children's television programming and commercial time limit obligations specified in FCC Rules 73.671 and 73.670 (47 CFR 73.671 and 73.670), respectively.

TBN is a not-for-profit, tax-exempt church corporation qualified under section 501(c)(3) of the Internal Revenue Code (26 USC 501(c)(3)). During the period of time covered by this certification, TBN did not air more than 10.5 minutes of commercial matter per hour during children's programming on weekends, or more than 12 minutes of commercial matter per hour on weekdays.

The following children's programs aired during the period of time covered by this certification:

Adventures in Booga Booga Land	Hermie and Friends	Super Simple Science Stuff
Another Sommer-Time Adventure	iShine Kneet	The Adventures of Carlos Caterpillar
Aqua Kids Adventures	Kid Fit	The Adventures of Donkey Ollie
Arnie's Shack	Kids Club	The Adventures of Skippy
BB's Bedtime Stories	Kids Like You	The Bedbug Bible Gang
Becky's Barn	Mary Rice Hopkins & Puppets with a Heart	The Charlie Church Mouse Show
BJ's Teddy Bear Club and Bible Stories	Mickey's Farm	The Choo Choo Bob Show
Bugtime Adventures	Mike's Inspiration Station	The Dooley and Pals Show
Cherub Wings	Miss Charity's Diner	The Filling Station
Children's Heroes of the Bible	Monster Truck Adventures	The Fred and Susie Show
Christopher Columbus	Mustard Pancakes	The Knock, Knock Show
Chubby Cubbies	Nanna's Cottage	The Reppies
Colby's Clubhouse	Owlegories	The Story Keepers
Come On Over	Pahappahoey Island	The Swamp Critters of Lost Lagoon
Cowboy Dan's Frontier	Paws and Tales – The Animated Series	The World of Jonathan Singh
Creations Creatures	Puppet Parade	The Zula Patrol
Curiosity Quest	Quigley's Village	Theo
Dr. Wonder's Workshop	Raggs	Topsy Turvy
Faithville	Retro News: A Blast from the Past	Tune Time
Flying House	Rocka-Bye Island	Two By 2
From Aardvark to Zucchini	RocKids TV	VeggieTales
Gerbert	Sarah's Stories	Wild About Animals
Gina D's Kids Club	Superbook	Zoo Clues
Gospel Bill	Superbook	

This certification is provided for the following digital program service(s) distributed on cable television systems: TBN Enlace*, SMILE/JUCE*, TBN HD* and The Hillsong Channel*.

This certification is true and correct, to the best of my knowledge and understanding, and is made this 4th day of October, 2019.

Signature

David Adcock, National Sales Director

* As specified in Children's Television Obligations Of Digital Television Broadcasters, FCC 04-221 (¶24), "digital broadcasters [are permitted] to air all of their additional [three (3) hours of] digital [children's] core programming, beyond the three (3) hour baseline on the main digital program stream, on one free digital video channel or distribute it across multiple free digital video channels, at their discretion, as long as the stream/s on which the core programming is aired has comparable carriage on multichannel video programming distributors ("MVPDs")." Accordingly, the combined JUCE and SMILE program service has a core block of children's programming of a minimum of nine (9) hours per week. Three (3) hours of that block provide compliance with FCC Rule 73.671 for the TBN Enlace service, and three (3) additional hours provide compliance for the Hillsong Channel service. In addition, the TBN and the TBN HD service provide a Saturday core block of a minimum of three (3) hours children's programming.

Certification of Compliance: FCC Children's Television Requirements
July 1, 2019 through September 30, 2019

On behalf of the Trinity Broadcasting Network (TBN), this is to certify that the program services named below comply with the FCC's children's television programming and commercial time limit obligations specified in FCC Rules 73.671 and 73.670 (47 CFR 73.671 and 73.670), respectively.

TBN is a not-for-profit, tax-exempt church corporation qualified under section 501(c)(3) of the Internal Revenue Code (26 USC 501(c)(3)). During the period of time covered by this certification, TBN did not air more than 10.5 minutes of commercial matter per hour during children's programming on weekends, or more than 12 minutes of commercial matter per hour on weekdays.

The following children's programs aired during the period of time covered by this certification:

The Story Keepers
Pahappahoey Island
RocKids TV
Hermie and Friends

VeggieTales
Superbook
Adventures in Booga Booga Land

This certification is provided for the digital program service broadcast on cable television systems for TBN*.

This certification is true and correct, to the best of my knowledge and understanding, and is made this 4th day of October, 2019.

Signature 
David Adcock, National Sales Director

* As specified in Children's Television Obligations Of Digital Television Broadcasters, FCC 04-221 (¶24), "digital broadcasters [are permitted] to air all of their additional [three (3) hours of] digital [children's] core programming, beyond the three (3) hour baseline on the main digital program stream, on one free digital video channel or distribute it across multiple free digital video channels, at their discretion, as long as the stream/s on which the core programming is aired has comparable carriage on multichannel video programming distributors ("MVPDs")." Accordingly, the combined JUCE and SMILE program service has a core block of children's programming of a minimum of nine (9) hours per week. Three (3) hours of that block provide compliance with FCC Rule 73.671 for the TBN Enlace service, and three (3) additional hours provide compliance for the Hillsong Channel service. In addition, the TBN and the TBN HD service provide a Saturday core block of a minimum of three (3) hours children's programming.



20733 W. 10 Mile Road, Southfield, MI 48075

Phone: (248) 357-4566 fax: (248) 350-2531

CHILDREN'S PROGRAMMING CERTIFICATION
{THIRD QUARTER JULY 1 – SEPT. 30, 2019}

This is to certify that **The Word Network** ("Network") as a standard practice does not air advertising. Atlantic Telephone Membership Cooperative may rely upon this certification for future calendar quarters unless notified in writing by the Network within five (5) days after the close of any quarter that advertising has been included in the Network's programming and that the Network is in compliance with the Children's Television Act of 1990 and with the rules and regulations of the Federal Communications Commission.

I hereby declare under penalty of perjury that the foregoing is true and correct.
Executed this 1st day of October 2019.

Signature: J. Mattiello

Name: JOHN MATTIELLO

Title: DIRECTOR OF MARKETING



October 8, 2019

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 3rd Quarter 2019. Please note that the Act's advertising limits are inapplicable to CNN, Headline News, TBS, 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.

For your convenience, the certificates of compliance are also available online for your review. Please follow these steps in order to download the certificates:

1. **Go to the Turner Resources web site at www.TurnerResources.com. [Note – if you do not have a user ID and password, you will need to register online with the web site.]**
2. **From the homepage go to "Technical" and scroll down to "Compliance Notices." You can download the Q3 – 2019 certificates by clicking on Kid Vid Certificates and following the prompts.**

If you have any questions, please contact me at (404) 575-9724 or e-mail barbara.debuys@turner.com. Thank you for your continued carriage of the Turner networks.

Kindest regards,

A handwritten signature in black ink, appearing to read "Barbara DeBuys". The signature is fluid and cursive.

Barbara DeBuys
Contracts Administrator

TURNER CONTENT DISTRIBUTION

1050 TECHWOOD DRIVE NW • ATLANTA, GA 30318-5604

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

I, Toni Millner, in my capacity as Assistant General Counsel and Vice President – Kid Vid Compliance 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 July 1, 2019, to September 30, 2019:

- 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) Turner treated all of the programs telecast on Cartoon Network, a leading ad-supported cable television network, 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.** 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 on Cartoon Network during the period noted above within the commercial limits set forth in the Act, to the extent applicable to the programming.
- 4) To the best of my information, knowledge and belief, there was only one instance in which the commercial limits were exceeded during this period. A detailed account of the commercial matter “overtime” occurring on Monday, September 2, 2019, is included in Exhibit 1.
- 5) Turner regrets this incident, which we have proactively investigated and reported. Turner continues to work to train its personnel and identify ways to improve our KidVid compliance procedures. Moreover, we urge that this incident be viewed in the context of the large amount of children’s programming (approximately 98 hours per week) that Cartoon Network has telecast during this period in compliance with the KidVid rules and regulations.

Certified by me this 3rd day of October, 2019.



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 7 nights a week from 8 p.m. to 6 a.m. on 7/1/19 – 9/28/19 and from 9 p.m. to 6 a.m. on 9/30/19. The Adult Swim block contains a warning to notify and remind viewers that the content is intended for an adult audience. It is not considered “children’s programming” subject to the commercial limits set forth in the Act.

Exhibit 1

Cartoon Network aired a programming marathon featuring every single episode of *Steven Universe* over the Labor Day weekend. On Monday, September 2, 2019, an employee working within Turner's Broadcast Operations Center ("BOC") discovered that one of the *Steven Universe* interstitials unexpectedly aired two times, which adversely affected the formatting and timing of the remaining programming and commercial elements for the day. This resulted in two minutes of commercial matter spilling into the hour between 9-10 a.m. and a technical commercial overage based on the clock-hour rules.

Turner has a process in which a dedicated "KidVid" compliance team conducts a detailed daily review of the telecast logs and playlists before they are finalized to verify that the commercial time limits will adhere to the statutory limits based upon the clock hour rule. In addition, BOC personnel perform time checks during their shifts and manage any necessary adjustments to the playlists. The BOC personnel discovered that a duplicate *Steven Universe* interstitial was mistakenly added between 7-8 a.m. disrupting the timing of the programming and commercials for the remainder of the day. The BOC personnel who discovered the timing discrepancies worked diligently to make adjustments and correct the remainder of the day's schedule but the discovery was made only after Cartoon Network had already experienced a commercial overage between the 9 a.m. – 10 a.m. hour exceeding the hour's commercial time limits by two minutes.


The investigation has not been able to determine the cause of the duplicate interstitial and whether it was due to an unintentional human or technical error. The BOC personnel on duty appreciated the importance of the KidVid rules and procedures and worked quickly to fix the schedule and avoid any additional commercial overages after the problem was discovered.

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

I, Toni Millner, in my capacity as Assistant General Counsel and Vice President – Kid Vid Compliance 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 from July 1, 2019, to September 30, 2019:

- 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) 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.
- 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 3rd day of October 2019.



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.

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

I, Toni Millner, in my capacity as Vice President and Assistant General Counsel for Turner Broadcasting System, Inc. ("Turner"), I hereby certify that for the period from July 1, 2019 to September 30, 2019:

- 1) I am familiar with the statutory limits of the Children's Television Act of 1990 (the "Act") and the Federal Communications Commission's regulations ("FCC Rules") implementing those limits for "children's programming"¹ (no more than 12 minutes per hour of commercial on weekdays, and no more than 10 ½ minutes per hour on weekends during "children's programming").
- 2) The FCC Rules require cable operators to maintain certain records regarding their compliance with the advertising limits imposed on children's television programming. These advertising limits and compliance reporting obligations do not apply to cable networks that do not carry "children's programming" as defined under the Act.
- 4) To the best of my information, knowledge, and belief, no "children's programming" has been telecast on NBA TV in the past quarter, nor is scheduled to be shown in the foreseeable future.
- 5) If there are any material changes in the programming policies of the television network so that children's programming is telecast on NBA TV (or in the event that the reporting obligations under the FCC Rules are changed), notice and updated certifications reflecting such changes will be provided.

Certified this 3rd day of October, 2019.



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

¹ "Children's programming" is defined under the Act as a program "originally produced and broadcast primarily for an audience of children 12 years old and younger."



October 7, 2019

National Cable Television Cooperative
11200 Corporate Avenue
Lenexa, KS 66219
Attn: Nisha Gowin

Re: Third Quarter (July 1, 2019 through September 30, 2019)
TVG/TVG2 Q3 2019 Compliance Certifications

Dear Ms. Gowin:

This letter is intended to assist NCTC in satisfying the following obligations:

- Under the Children's Television Act of 1990 and the Federal Communications Commission rules implementing the Act (Ref. 76.1703, 76.225) (the "Regulations"), ODS Technologies, L.P. hereby certifies that TVG Network contains no children's programming and is thus in compliance with the aforementioned regulations.
- Under Section 79.1(j)(2) of Title 47 of the Code of Federal Regulations regarding closed captioning quality, ODS Technologies, L.P. hereby certifies that TVG Network is exempt from the closed captioning rules under the following exemption: 47 C.F.R. §79.1(d)(4) – primarily textual programming.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kevin Grigsby", with a stylized flourish at the end.

Kevin Grigsby
Vice President & Executive Producer
TVG Network



Children's TV Act Compliance Certification

The Weather Channel certifies that The Weather Channel cable programming service does not contain any "children's programming" (as defined by the FCC.) In the event The Weather Channel includes "children's programming" in the future, we will notify affiliates immediately and provide the necessary information for compliance with recordkeeping requirements under the Children's Television Act of 1990.

Executed this 1st day of October, 2019



October 1, 2019

RE: Children's Programming Certification

Dear Affiliate:

This is to certify that UP programming service (the "Service"), to the extent it airs children's programming as defined under 47 CFR 76.255 of the rules and regulation of the Federal Communications Commission, has aired no more than 10.5 minutes of commercial matter per hour on the weekends, and no more than 12 minutes of commercial matter per hour on weekdays during children's programming, and is otherwise in compliance with the Children's Television Act of 1990.

The following sets forth children's programming aired on the Service through and including the Third Quarter of 2019: None.

Best regards,

A handwritten signature in black ink, appearing to read "Reta Peery", is written over the typed name.

Reta Peery
Chief Administrative & Operations Officer/General Counsel



COMMERCIAL TIME – CHILDREN’S PROGRAMMING
VIACOM MEDIA NETWORKS CERTIFICATION: 3rd Quarter 2019

The following certification is provided regarding compliance during the period of July 1, 2019 to September 30, 2019 (the “Current Quarter”) with the commercial time limitations set forth in the FCC’s April 12, 1991 Report and Order Implementing the Children’s Television Act of 1990 (the “Act”) and the rules adopted therein.

NICKELODEON aired children’s programming during the Current Quarter to the extent indicated by the attached program schedules. The children’s programming NICKELODEON aired during the Current Quarter contained commercial matter in an amount that was not more than 12 minutes per hour on weekdays and 10.5 minutes per hour on weekends. NICKELODEON accordingly certifies that it is in compliance for the Current Quarter with the limitations set forth in the Act and FCC rules.

NICK JR., TEENNICK, NICKTOONS and NICK AT NITE aired children’s programming during the Current Quarter as indicated by the attached program schedules for those services, but to the extent these services carried commercials, the amount of commercial matter was within the time limitations set forth in the Act.

Program services MTV, MTVU, MTV2, MTV LIVE, MTV CLASSIC, VH1, LOGO, CMT, CMT MUSIC, COMEDY CENTRAL, TR3S, PARAMOUNT NETWORK (previously known as SPIKE TV), TV LAND, BET SOUL, BET JAMS, BET, BET HIP HOP, BET GOSPEL, BET HER, and NICK MUSIC did not air any children’s programming subject to the requirements of the Act during the Current Quarter.

VIACOM MEDIA NETWORKS,
a division of Viacom International Inc.,
on its own behalf and on behalf of
BLACK ENTERTAINMENT TELEVISION LLC

By: 
Nur-ul-Haq
Vice President, Counsel
Corporate Law Department



CLOSED CAPTIONING AND CHILDREN'S PROGRAMMING CERTIFICATION
THIRD QUARTER 2019 (July 1, 2019 THROUGH September 30, 2019)


This is to certify that World Fishing Network ("Network") is in compliance with the closed captioning requirements set forth in Section 79.1, *et seq.*, of Title 47 of the Code of Federal Regulations (the "Regulations"), and that all programming provided by Network to each Affiliate during the 3rd Quarter of 2019 was, to the best of Network's knowledge and belief, captioned to the extent required by such Regulations. Further, pursuant to Section 79.1(j)(1) of the Regulations, Network hereby certifies that in the ordinary course of business, it has adopted and follows Best Practices set forth in Section 79.1(k)(1) thereof.

This is to further certify that Network does not currently contain any children's programming as defined under 47 CFR 76.225 of the rules and regulation of the Federal Communications Commission (the "Children's Programming Rules"). In the event that the Network includes any children's programming on its schedule after the date hereof, Network will provide in writing, by the tenth day following the end of the calendar quarter in which such children's programming is added, a description of such programming specifying the dates and time of transmission and the duration of the "commercial matter" included therein.

I certify that I have been designated by Network as the official responsible for the oversight of compliance with the Regulations and the Children's Programming Rules, and I am familiar with the Regulations and the Children's Programming Rules. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30th day of September 2019

Network: World Fishing Network

By: 
Steve Smith
EVP Distribution & Affiliate Marketing



October 2, 2019

Subject: WGN America FCC Closed Captioning Compliance Certification Q3 2019

This letter certifies that during the **3rd quarter of 2019**, based on certifications received from its program providers/syndicators, the video programming either aired on or provided by WGN America satisfies the captioning requirements of FCC Rule 79.1(b) and the caption quality standards of FCC Rule 79.1(j)(2) (accuracy, synchronicity, completeness and placement), except as noted below:

- For the Elementary airings listed below, captions were transmitted, but delayed causing the scene and speech to be out of synch. The problem has been resolved.
Elementary 9/24 #614
Elementary 9/25 #615
- On July 13 WGN America became aware of an internal transfer issue that occurred during an erroring of M*A*S*H that resulted in garbled and missing captioning. It has since made technical corrections needed to help ensure such captioning errors do not occur in the future.

Sincerely,
Carmen Finch
Programming Supervisor
WGN America

CHILDREN'S PROGRAMMING CERTIFICATE

YES Network, LLC hereby certifies that it was in compliance with the Children's Television Act of 1990 and the implementing rules and regulations of the Federal Communications Commission during the third quarter of 2019.

Dated: 10/1/19

Marc LaPlace
Director, Programming
YES Network, LLC