

**TURNER CLASSIC MOVIES (TCM)**  
**CLOSED CAPTIONING**  
**QUALITY CERTIFICATION**

Turner Classic Movies (TCM) (the “Programmer”) hereby states that its video programming intended for U.S. residential distribution, as currently provided, complies with applicable caption quality requirements of the Federal Communications Commission (“FCC”): (1) by satisfying the caption quality standards of Section 79.1(j)(2) of the FCC rules; (2) by the Programmer adopting and following, in the ordinary course of business, the Best Practices set forth in Section 79.1(k)(1) of the FCC rules; or (3) because the Programmer or relevant programming is exempt from the FCC’s closed captioning rules under one or more of the following exemptions, including: (i) Section 79.1(d)(3) (programming for which the audio is in a language other than English or Spanish and that is not scripted programming able to be captioned using the electronic news room technique); (ii) Section 79.1(d)(4) (primarily textual programming); (iii) Section 79.1(d)(5) (programming distributed in late night hours); (iv) Section 79.1(d)(6) (interstitials, promotional announcements, and public service announcements that are 10 minutes or less in duration); (v) Section 79.1(d)(10) (primarily non-vocal musical programming); (vi) Section 79.1(d)(11) (because the expense for captioning the programming would exceed two percent of the gross revenues received from the relevant channel or program stream during the prior calendar year); or (vii) Section 79.1(d)(12) (because the relevant channel or stream of video programming produced annual gross revenues of less than \$3,000,000 during the prior calendar year and captioning is not made available for the channel or stream to pass through).

Certified this 7<sup>th</sup> day of April, 2018

By:   
Name: Michelle Hylton

Title: Vice President – FCC Compliance, Turner Entertainment Networks, Inc.