### **TUI'neI'**

April 6, 2016

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 1<sup>st</sup> Quarter 2016. 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 <u>www.TurnerResources.com</u>. [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 for TurnerResources.com, you will find the Children's Television Programming certificates of compliance by clicking on a "link" called "FCC Compliance."

If you have any questions, please contact me at (404) 827-3395 or e-mail sherry.kangalee-carter@turner.com. Thank you for your continued carriage of the Turner networks.

Kindest Regards, ) hurry Müngalle-Curter

Sherry Kangalee-Carter Contracts Administrator

Attachments

## 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 January 1, 2016, to March 31, 2016:

- 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 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 was only one instance in which the commercial limits were exceeded during the period noted above. On January 9, 2016, the commercial matter broadcast on Cartoon Network exceeded the statutory limits by 32 seconds in the hour between 7 to 8 p.m. pm due to an unintentional human error. A detailed account of this incident is attached as Exhibit 1.
- 5) Cartoon Network regrets this incident. We respectfully request that this incident be viewed in the context of the vast amount of children's programming that Cartoon Network has telecast during this period and in the past years without incident and in full compliance with the KidVid rules and regulations.

Certified by me this 5th day of April, 2016.

Toni Millner

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

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<sup>&</sup>quot;"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."

<sup>\*\*</sup>During this period, the "Adult Swim" block of programming aired from 8 p.m. to 6 a.m., 7 nights a week. The Adult Swim block contains regular 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

#### Exhibit 1

On Saturday, January 9, 2016, a Cartoon Network Broadcast Operations Center ("BOC") supervisor made an unintentional mistake that resulted in a technical commercial overage in the commercial time limits in the hour between 7 p.m. and 8 p.m. on Cartoon Network.

The BOC supervisor was handling an infrequent weekend request to replace a commercial in the network's scheduled play list with a new version of the commercial. The supervisor inserted the new version of the commercial, but did not recognize that the new version was a 30-second spot and longer than the original 15-second version. The new spot aired 3 times before the error was caught and remedied. As a result, Cartoon Network inadvertently exceeded the weekend commercial time limits by 32 seconds during the hour between 7-8 p.m.

The incident was the simple result of human error. The operations center personnel who had received training and appreciated the importance of the KidVid rules and procedures have been reminded to exercise care to ensure that any commercial substitutions in children's programming take into account the time limits.

## 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 January 1, 2016, to March 31, 2016:
  - 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 5th day of April, 2016.

Toni Millner

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

<sup>\* &</sup>quot;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 Assistant General Counsel for Turner Broadcasting System, Inc. ("Turner"), certify that:

- 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" (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 \_\_5<sup>th</sup> \_\_\_ day of April, 2016.

Toni Millner

Assistant General Counsel and Vice President—Kid Vid Compliance Turner Broadcasting System, I

<sup>&</sup>lt;sup>1</sup> "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."