

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

I, Toni Millner, in my capacity as Associate General Counsel and Vice President – Kid Vid Compliance for Cartoon Network, hereby certify to the best of my information, knowledge, and belief, that the following information is accurate for the period from October 1, 2020 to December 31, 2020:

- 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) Cartoon Network 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 105 hours of television programming were treated as "children's programming" for the purposes of the commercial limits set forth in the Act.
- 3) Cartoon Network 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) During this period, there was one incident in which the amount of commercial matter in children's programming exceeded the statutory limits by approximately 15 seconds. Details of the commercial "overage" that occurred as a result of human error on Tuesday, December 15, 2020, are in Exhibit 1.
- 5) Cartoon Network regrets this incident that happened in the midst of corporate reorganization and layoffs. We urge that this incident be viewed in the context of the large amount of children's programming that Cartoon Network had telecast during this period and throughout the year in compliance with the KidVid rules.

Certified by me this 7th day of January, 2021.


[Toni Millner \(Jan 7, 2021 17:46 EST\)](#)

Toni Millner
Associate General Counsel and
Vice President - Kid Vid Compliance

* "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 9 p.m. to 6 a.m., 7 nights a week with the following exceptions. Adult Swim started at approximately 9:30 p.m. on 12/20/20 after a longer theatrical movie was telecast and started at 8 p.m. on 12/28/20 – 12/31/20. The Adult Swim block contains television ratings and 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 Tuesday, December 15, 2020, an employee working within our Broadcast Operations Center (“BOC”) made a mistake that resulted in a 15-second time overage in the commercial time limits on Cartoon Network between the hour of 10 a.m. to 11 a.m.

The BOC made a mistake improperly editing an “on-air” play list. An extra 15-second commercial that was not on the pre-approved schedule was added at 10:29:06 a.m. As a result of this human error and additional commercial, Cartoon Network inadvertently increased the amount of commercials to 12 minutes and 15 seconds within the hour.

Cartoon Network understands and appreciates the importance of the KidVid rules and procedures and provides compliance training materials to all BOC employees, but the BOC operator (who is no longer employed by the company in connection with a corporate reorganization) simply made a mistake under the circumstances.






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Final Audit Report

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