

TURNER

October 5, 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 3rd 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 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 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,



Sherry Kangalee-Carter
Contracts Administrator

Attachments

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, 2016, to September 30, 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 were no instances in which the commercial limits were exceeded during the period noted above.

Certified by me this 3rd day of October, 2016.



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. 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 Sunday, July 31, 2016, there was an incident in which an employee working within Turner's Broadcast Operations Center ("BOC") made an unintentional mistake that resulted in a technical 15-second time overage in the commercial time limits on Boomerang in the hour between 2 – 3 p.m.

A BOC employee was handling a last minute "timing adjustment" in which an employee inserts a network promotion or other element of non-commercial content during a break or at the end of a television program when an episode of a series runs short in duration. Timing adjustments help to ensure that the scheduled programming for a television network remains on time and that programming starts at the top of a broadcast hour. In this case, however, the employee mistakenly replaced a 15-second spot with a longer 30-second version of a spot promoting an animated series on Cartoon Network instead of selecting a promotional spot for an upcoming show on Boomerang. The spot promoted *Steven Universe*, an age-appropriate, children's television program, but network cross-promotional spots historically have been counted as "commercial" time. As a result, Boomerang inadvertently increased the amount of commercials and exceeded the hour's commercial time limits by 15 seconds.

The personnel involved appreciated the importance of the KidVid rules and procedures, but simply made a mistake. Turner has provided the BOC employee with further training and a reminder to exercise care to ensure that any time adjustments during children's programming take into account not only the time limits but also recognize the difference between cross-promotional content, commercial content and promotional content.

**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, 2016, to September 30, 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) During this period, there was one incident in which the amount of commercial matter broadcast during children’s programming exceeded the statutory limits by approximately 15 seconds due to an unintentional human error. A detailed account of the commercial matter “overage” occurring on Sunday, July 31st is included in Exhibit 1.
- 5) Turner regrets this incident and has taken appropriate remedial action to ensure our ongoing KidVid compliance. Moreover, we urge that this incident be viewed in the context of the large amount of children’s programming (approximately 168 hours per week) that Boomerang has telecast during this period without incident and in compliance with the KidVid rules and regulations.

Certified by me this 3rd day of October, 2016.



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

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* “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:

- 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, 2016.



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

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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."