



October 5, 2018

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 2018. 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 – 2018 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,

Barbara DeBuys
Contracts Administrator

TURNER CONTENT DISTRIBUTION

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**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, 2018, to September 30, 2018:

- 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) 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 7 seconds due to an unintentional human error. A detailed account of the commercial matter “overage” occurring on Sunday July 1, 2018, is included in Exhibit 1.
- 5) Turner regrets this incident, which we have proactively investigated and reported. Turner will continue to work to 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 4th day of October, 2018.



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 1, 2018, there was an incident in which an employee working within Turner's Broadcast Operations Center ("BOC") made an unintentional mistake that resulted in a 7-second time overage in the commercial time limits on Cartoon Network between the hour of 1pm to 2pm.

Under normal procedures, the full broadcast day for Cartoon Network is pretimed several hours before broadcast by the Broadcast Operations staff. The staff member who handled the timing made a placement mistake while adjusting promotional content. The employee mistakenly inserted a :30 second promo within the wrong hour. As a result, Cartoon Network inadvertently increased the amount of commercial timing to 10 minutes and 37 seconds of advertising within the hour between 1 pm to 2 pm. The hour's commercial time limit was exceeded by 7 seconds during this hour period. This also resulted in a commercial underage in the prior hour so that Cartoon Network only had 10 minutes and 23 seconds of advertising within the hour between noon to 1 pm.


Turner appreciates the importance of the KidVid rules and procedures, but the BOC operator simply made a mistake. In addition to the KidVid training materials made available to all members of the Broadcast Operations team, Turner has provided the individual, their immediate management team and their fellow team members with additional training. A reminder to exercise caution when making any timing adjustments during children's programming and to be aware of the commercial time limits per hour also has been issued within daily shift meeting and department correspondence within the BOC group.

**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, 2018, to September 30, 2018:

- 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 4th day of October, 2018.



Toni Millner
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, 2018 to September 30, 2018:

- 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 4th day of October, 2018.



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."