

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

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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 April 1, 2017, to June 30, 2017:

- 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 30 seconds due to an unintentional human error. A detailed account of the commercial matter “overage” occurring on Sunday, April 23, 2017, 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 6<sup>th</sup> day of July, 2017.



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

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\* “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, April 23, 2017, there was an incident in which an employee working within Turner's Broadcast Operations Center ("BOC") made an unintentional mistake that resulted in a 30-second time overage in the commercial time limits on Cartoon Network in the hour between 10-11 a.m.

A BOC employee was handling a weekend request from ad sales to change a previously scheduled commercial spot. Under normal procedures, the request to make the change to the scheduled on-air play list would be routed through a proprietary online ticketing system and process that helps ensure appropriate ad insertions and timing adjustments are made, but due to a software glitch, the BOC employee was forced to make a manual adjustment. The employee mistakenly inserted the newly requested 30-second commercial without removing another 30-second commercial. As a result, Cartoon Network inadvertently increased the amount of commercials to 11 minutes of advertising and exceeded the hour's commercial time limits by 30 seconds during this period.

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 the BOC employees, Turner has provided the BOC employee a reminder to exercise care to ensure that any time adjustments during children's programming take into account the commercial time limits.

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

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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 April 1, 2017, to June 30, 2017:

- 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 6<sup>th</sup> day of July, 2017.



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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**

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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 April 1, 2017 to June 30, 2017:

- 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"<sup>1</sup> (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 6<sup>th</sup> day of July, 2017.



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

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<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."