

**Gray Television Licensee, LLC
WTAP-TV, Parkersburg, WV (FID 4685)
CORE Programming Exhibit**

Gray Television Licensee, LLC (“Gray”) is licensee of WTAP-TV, Parkersburg, West Virginia (“WTAP” or the “Station”). Gray complied at all times with the requirement to air on its primary program stream a minimum of three hours per week of educational and information programming directed toward children ages 16 and younger (“CORE programming”). Likewise, Gray ensured that WTAP’s .2 and .3 multicast streams each aired at least three hours of CORE programming each quarter. However, in July 2014, during an audit of the Station’s programming streams, Gray determined that the Station was not broadcasting a sufficient amount of CORE programming to cover its fourth digital stream. Gray immediately secured additional CORE programming and established a plan to broadcast well in excess of the required amount of CORE programming for the remainder of the license period.

During the license term, the Station aired a fourth program stream featuring 24/7 weather information. While this program stream well-serves the public interest of local viewers by providing a dedicated over-the-air weather source for viewers without access to cable or satellite, the Station did not air a sufficient amount of CORE programming to cover this fourth digital stream.

47 C.F.R. § 73.67(d) provides that a license renewal can be approved at the staff level if the licensee demonstrates “that they have aired a package of different types of educational and informational programming that, while containing somewhat less core programming than indicated by the applicable guideline, demonstrates a level of commitment to educating and informing children at least equivalent to airing the amount of programming indicated by the guideline.” Gray broadcast a significant amount of additional CORE programming on WTAP to balance the shortages in certain quarters. Overall, the amount of CORE programming aired by Gray on WTAP significantly exceeded its obligation under the Children’s Television Act of 1990 and the Commission’s rules.

The chart below summarizes the amount of CORE programming aired on the Station from 4Q 2012 through 3Q 2019.¹

| Quarter/Year | Number of digital program streams | Required number of hours of CORE programming | Actual number of hours of CORE programming | Surplus/(Deficit) of CORE programming |
|---------------------|--|---|---|--|
| 4Q 2012 | 3 | 9 | 7.5 | (1.5) |
| 1Q 2013 | 4 ² | 10.8 | 8.3 | (2.5) |
| 2Q 2013 | 4 | 12 | 9.5 | (2.5) |
| 3Q 2013 | 4 | 12 | 9.5 | (2.5) |

¹ The Children’s Television Programming Rules: Modernization of Media Regulations Initiative, MB Docket Nos. 18-202 and 17-105, Report and Order, 34 FCC Rcd 5822 (2019) (Report and Order) removed the requirement to air an additional three hours of CORE programming for each 24/7 multicast stream broadcast by a station. This rule change took effect on September 16, 2019. While the Station continues to air CORE programming on its multicast streams, the chart above includes only those time-periods when the previous rule was in effect.

² The Station added an additional program stream part way through the quarter. The required number of CORE programming hours listed above is the pro-rated number of hours based on the number of hours of overall programming aired on the newly added stream.

| | | | | |
|---------|---|-------|-------|-------|
| 4Q 2013 | 4 | 12 | 9.5 | (2.5) |
| 1Q 2014 | 4 | 12 | 9.5 | (2.5) |
| 2Q 2014 | 4 | 12 | 9.5 | (2.5) |
| 3Q 2014 | 4 | 12 | 14 | +2 |
| 4Q 2014 | 4 | 12 | 15 | +3 |
| 1Q 2015 | 4 | 12 | 15 | +3 |
| 2Q 2015 | 4 | 12 | 15 | +3 |
| 3Q 2015 | 4 | 12 | 15 | +3 |
| 4Q 2015 | 4 | 12 | 13.5 | +1.5 |
| 1Q 2016 | 4 | 12 | 15 | +3 |
| 2Q 2016 | 4 | 12 | 15 | +3 |
| 3Q 2016 | 4 | 12 | 15 | +3 |
| 4Q 2016 | 4 | 12 | 15 | +3 |
| 1Q 2017 | 4 | 12 | 15 | +3 |
| 2Q 2017 | 4 | 12 | 15 | +3 |
| 3Q 2017 | 4 | 12 | 15 | +3 |
| 4Q 2017 | 4 | 12 | 15 | +3 |
| 1Q 2018 | 4 | 12 | 15 | +3 |
| 2Q 2018 | 4 | 12 | 14.4 | +2.4 |
| 3Q 2018 | 4 | 12 | 15 | +3 |
| 4Q 2018 | 4 | 12 | 15 | +3 |
| 1Q 2019 | 4 | 12 | 15 | +3 |
| 2Q 2019 | 4 | 12 | 15 | +3 |
| 3Q 2019 | 4 | 12 | 15 | +3 |
| TOTALS | | 331.8 | 375.2 | +43.4 |

Gray appreciates the commitment of WTAP to provide a dedicated source of over-the-air weather information for its viewers without access to cable or satellite, however, it regrets that the Station did not ensure that it was broadcasting sufficient CORE programming for its fourth digital stream. To correct these shortages, Gray secured additional CORE programming, which the Station has aired with fidelity since 3Q 2014. When assessed as a whole, WTAP provided significantly more than the minimum amount of CORE programming to its viewers in the Parkersburg market.

Gray respectfully submits that it has satisfied its obligations under the Children's Television Act of 1990 and that its efforts to offer programming far in excess of the minimum requirement demonstrates a "level of commitment to educating and informing children" that is sufficient for its license renewal to be granted at the staff level.