

Exhibit

Core Programming Processing Guideline

Licensee requires its stations to comply with all FCC rules, including the rules on children's programming. KRIS-TV's compliance with the FCC's children's programming requirements is detailed in the quarterly and annual children's television programming reports that KRIS-TV has filed with the FCC, all of which are incorporated by reference into the instant application.

During the current license term, KRIS-TV consistently aired programming that met the educational and informational needs of children ("Core Programming"). While most of KRIS-TV's Core Programming aired as scheduled, due to changes in programming from the station's programming provider on the primary stream, some episodes of the programs needed to be preempted. Preempted Core Programs usually were rescheduled so viewers were able to watch the programs in accordance with Commission rules. In a few instances in 2021, however, certain episodes of Core Programs were preempted due to sports and other Olympic programming and rescheduled in a manner that may not have strictly complied with the rules the FCC adopted to reschedule preempted Core Programming. Taking a strict view, the station aired 25 hours of Core Programming in the second quarter and 23 hours in the third quarter of 2021. KRIS-TV notes, however, that all of the preempted programming was in fact rescheduled just outside of the required seven-day window. Accordingly, the station aired 3.5 hours of Core Programming that was not regularly scheduled weekly programming across the two quarters, thus making any shortages de minimis and immaterial. In addition, over the course of 2021, the station aired 156 hours of Core Programming on its D2 channel that was in excess of the amount that a station can count toward compliance with the FCC's rules. This is in addition to the hundreds of additional hours of Core Programming the station aired throughout the license term. Other than the instances noted above, the station complied with the standard Core Programming processing requirements for the rest of the station's license term.

While KRIS-TV asserts that it substantially and materially complied with the Core Programming processing guidelines and that any shortages were de minimis, KRIS-TV also notes that throughout the license term, the station demonstrated a commitment to educating and informing children that is at least equivalent to airing three hours per week of Core Programming because KRIS-TV aired other programming that contributes to the educational development of children. For example, throughout the license term, the station aired numerous news segments aimed at providing updates for children and their parents. The station also aired several stories that highlighted many of the achievements of students in the viewing area.¹ In addition, throughout the pandemic the station has provided families with information regarding changes to school schedules, vaccines, and other public health information.

KRIS-TV also participates in and gives on-air support to numerous community initiatives that support children and families. For example, KRIS-TV has partnered with Scripps Howard Foundation to help raise almost \$50,000 for the Coastal Bend Food Bank. Overall, as demonstrated herein and its children's television programming reports, KRIS-TV has shown a

¹ See, e.g., C. Adamez, *Alice Teacher Follows Through on Getting a New 'Do*, KRIS 6 News Corpus Christi (Mar. 30, 2021), <https://www.kristv.com/news/local-news/alice-teacher-follows-through-on-getting-a-new-do>.

commitment to ensuring the children of Corpus Christi are educated and informed and ready to meet the challenges of the 21st century. The station has redoubled its efforts to ensure that the station airs sufficient Core Programming to meet the processing guidelines in the FCC's children's programming rules.