

Core Programming Processing Guidelines

Scripps Broadcasting Holdings LLC (“Scripps”) confirms that for the current license term, KOAA-TV has materially complied with the Core Programming criteria and Core Programming Processing Guidelines as required by the Commission's rules in effect at the time the Core Programming aired.

In addition, in an abundance of caution, Scripps notes that during the third quarter of 2021, some of the children’s programming that aired on KOAA-TV was pre-empted due to NBC coverage of the Olympics. KOAA-TV diligently worked to reschedule the preemptions within the seven-day makegood window and was successfully able to makegood all pre-empted programs within the seven-day makegood window except for one thirty-minute program that aired nine days before the original air date. In all instances viewers were informed of the scheduling changes as required by the Commission’s rules and KOAA-TV averaged 3 hours per week of Core Programming over the six-month period taken as a whole. Scripps asserts that the extra time between the original air date and the date on which the one episode aired was *de minimis* due to the extenuating circumstances involved and was consistent with informal FCC staff advice received by NBC prior to the airing of Olympic coverage.