

**Certification Regarding Compliance with Core Programming Processing Guidelines**

The station aired an average of at least three hours per week of regularly scheduled educational/informational (“E/I”) programming during the license term. However, because some of the E/I programs that aired on the station’s primary stream were preempted and rescheduled during time slots that were not the program’s “second home,” such rescheduled episodes could not count toward the station’s “core programming” hours under the Commission’s processing guidelines that were in effect prior to September 2019 and, as a result, the station cannot certify that it fully satisfied the core programming guidelines in effect at the time. Applicant notes that all but one of the preempted episodes would have counted as core programming under the Commission’s current processing guidelines because they were all rescheduled within seven days—with most scheduled within 24-48 hours of the preemption—and between the hours of 7:00 a.m. and 10:00 p.m. and (in all but one instance) with timely notice to the public of the rescheduled date and time.

While under management of the previous licensee, station staff had been informed by the station’s third-party E/I program supplier that the station was contractually required to air the E/I program block in the same sequential program order as it was delivered by the program supplier. As a result, when a single program was preempted, station staff also rescheduled all of the remaining programs in the block so the programs would air in the same order as originally scheduled. Staff rescheduled a number of programs on their second home, but due to the volume of rescheduled programs that resulted from airing all programs in sequential order they could not reschedule all episodes on the second home. Station staff continued this practice following Applicant’s acquisition of the station. Applicant’s regional programming manager subsequently informed staff that only the preempted programs needed to be rescheduled. The station promptly modified its preemption rescheduling practices with respect to such programming and has satisfied the Commission’s core programming processing guidelines since Q4 2019.

The station is committed to serving the educational and informational needs of children through broadcast and non-broadcast efforts. In addition to airing an average of at least three hours of E/I programming on the primary stream each week during the license term, the station aired more than three hours of weekly core programming on its multicast streams during most quarters prior to Q4 2019, and continues to air at least three hours per week of core programming on its multicast streams even though not required by the current core programming processing guidelines. Further, as noted in the station’s Children’s Television Programming Reports, the station and its personnel have contributed significant time and resources to local tutoring and mentorship programs and to local chapters of Big Brothers Big Sisters, Boy Scouts, Boys and Girls Club, and Women and Children First, among others.