

Section 73.671(c)(5) – E/I Symbol – Certification Explanation

Milwaukee Area Technical College District Board (“MATC”), licensee of noncommercial educational television station WMVT(TV), Milwaukee, Wisconsin (“WMVT”), certifies “no” to its compliance with the E/I symbol requirements in Section 73.671(c)(5) for a 2-year portion of its 8-year license term (i.e., from January 2018 to January 21, 2020).

For the reasons described below and elsewhere in this application, MATC respectfully submits that WMVT’s license should be renewed despite its “no” response to the question regarding use of the E/I symbol through its entire license term.

From the FCC’s implementation of the Children’s Television Act in 1996 until 2004, noncommercial broadcasters were exempt from the FCC’s on-air identification requirement for “Core” children’s programming. In 2004, the FCC required all broadcasters – including noncommercial broadcasters—to use the E/I symbol for identify “Core” children’s programming. In 2019, the FCC again exempted noncommercial broadcasters from the on-air identification requirement for “Core” children’s programming.

Under these circumstances, and given MATC’s demonstrated commitment to educate and inform the children in its community of license and within its coverage area as shown in this renewal application and on its website, MATC submits that its substantial compliance with the E/I symbol requirement (during the last two years that the requirement was in effect for WMVT) is sufficient for application of the staff’s renewal processing standard.