

## **K17JI-D License Renewal Application**

K17JI-D (“K17JI” or the “station”) was acquired by HC2 Station Group, Inc. (“HC2”) on December 18, 2017. As shown below, the station complied with the core programming requirements in all quarters.<sup>1</sup>

### **Fourth Quarter 2017**

As a practical matter, HC2 owned the license for K17JI for only two weeks in this quarter. K17JI timely filed its fourth quarter 2017 children’s programming report on January 2, 2018, as amended on May 4, 2018 (FCC File Number: 0000037071). During its two weeks of ownership in this quarter, the station broadcast an average of 7.3 hours of core programming on the station’s primary channel, as reflected in the report. However, the station did not broadcast two multicast channels during these two weeks as suggested in the report – it only broadcast one multicast channel for an average of 168 hours per week.<sup>2</sup> That multicast channel, which aired Spanish language core programming, averaged 2.65 hours of core programming in those two weeks, but this minor deficiency was more than compensated for by the 4.3 extra hours of core programming aired on the primary channel, and thus the station was compliant during this quarter.

### **First Quarter 2018**

K17JI timely filed its First Quarter 2018 children’s programming report on April 3, 2018, as amended on April 30, 2018 (FCC File Number: 0000049676). During the First Quarter of 2018, the station broadcast an average of 7.0 hours of core programming on the station’s primary channel, as reflected in the report, which was more than the required average of 3.0 hours. However, the station did not broadcast two multicast channels during the quarter as suggested in the report – it only broadcast one multicast channel for an average of 168 hours per week.<sup>3</sup> That multicast channel, which aired Spanish language core programming, averaged 4.5 hours of core programming per week during the quarter, which was more than the required average of 3.0 hours, and thus the station was compliant during this quarter.

### **Second Quarter 2018**

K17JI timely filed its Second Quarter 2018 children’s programming report on July 9, 2018 (FCC File Number: 0000056850). During the Second Quarter of 2018, the station broadcast an average of 7.5 hours of core programming on the station’s primary channel, as reflected in the report, which was more than the required average of 3.0 hours. However, the station did not broadcast two multicast channels during the quarter as suggested in the report – it

---

<sup>1</sup> As described further below, the stations should be deemed in compliance in the Second and Third Quarters of 2019 due to rounding up.

<sup>2</sup> An amendment to the children’s programming report for this quarter is being concurrently uploaded to the station’s online public file in order to reflect this change.

<sup>3</sup> An amendment to the children’s programming report for this quarter is being concurrently uploaded to the station’s online public file in order to reflect this change.

only broadcast one multicast channel for an average of 168 hours per week.<sup>4</sup> That multicast channel, which aired Spanish language core programming, averaged 5.5 hours of core programming per week during the quarter, which was more than the required average of 3.0 hours, and thus the station was compliant during this quarter.

### **Third Quarter 2018**

K17JI timely filed its Third Quarter 2018 children's programming report on October 9, 2018 (FCC File Number: 0000061069). During the Third Quarter of 2018, the station broadcast an average of 9.57 hours of core programming on the station's primary channel, as reflected in the report, which was more than the required average of 3.0 hours. The station broadcast one multicast channel for an average of 168 hours per week, as reflected in the report, before the multicast station ceased operations on September 1, 2018. That multicast channel, which aired Spanish language core programming, averaged 5.0 hours of core programming per week during the quarter, which was more than the required average of 3.0 hours, and thus the station was compliant during this quarter.

### **Fourth Quarter 2018**

K17JI timely filed its Fourth Quarter 2018 children's programming report on January 10, 2019 (FCC File Number: 0000066316). During the Fourth Quarter of 2018, the station broadcast an average of 27.5 hours of core programming on the station's primary channel, which appears to have been rounded up to 28.0 hours in the report, and was far more than the required average of 3.0 hours. The station broadcast one multicast channel for an average of 168 hours per week, as reflected in the report. That multicast channel, which aired Spanish language core programming, averaged 4.0 hours of core programming per week during the quarter (which appears to have been rounded up to 4.5 hours in the report), and which was more than the required average of 3.0 hours. Thus, the station was compliant during this quarter.

### **First Quarter 2019**

K17JI timely filed its First Quarter 2019 children's programming report on April 8, 2019 (FCC File Number: 0000069993).<sup>5</sup> During the First Quarter of 2019, the report indicates that the station broadcast an average of 6.0 hours of core programming on the station's primary channel. However, the report inadvertently omitted one core program broadcast on the station's primary channel. This program was called "Tiny Tots for Jesus," a qualified 30-minute core program which aired 52 times during the quarter.<sup>6</sup> Thus, the total average per week of core programming was 9.42 hours of core programming per week during the quarter on the primary channel.

---

<sup>4</sup> An amendment to the children's programming report for this quarter is being concurrently uploaded to the station's online public file in order to reflect this change.

<sup>5</sup> As noted in the report, the station was silent from February 5, 2019 until March 4, 2019, and information provided in the report covers the time period during which the station broadcast during this quarter.

<sup>6</sup> An amendment to the children's programming report for this quarter is being concurrently uploaded to the station's online public file in order to reflect this change.

The report indicates that the station broadcast one multicast channel for an average of 168 hours per week. That report indicates that the multicast channel averaged 0.0 hours of core programming per week during the quarter. Although the station was deficient in its amount of core programming on its multicast channel, this was made up by the extra core programming aired on the primary channel during this quarter, and thus when averaged across the two channels, the station was compliant during this quarter.

### **Second Quarter 2019**

K17JI timely filed its Second Quarter 2019 children's programming report on July 10, 2019 (FCC File Number: 0000077459). During the Second Quarter of 2019, the report indicates that the station broadcast an average of 3.5 hours of core programming on the station's primary channel. However, the report inadvertently omitted two core program broadcast on the station's primary channel.<sup>7</sup> The first program was called "Tiny Tots for Jesus," a qualified 30-minute core program which aired 52 times during the quarter. The first program was called "Kids Time," a qualified 30-minute core program which aired 77 times during the quarter. Thus, the total average per week of core programming was 8.46 hours of core programming per week during the quarter on the primary channel.

During this quarter, the station had two multicast channels. One of the multicast channels (CRTV) provided an average of 0.5 hours of core programming, while the other multicast channel (Revenue Frontier) provided no core programming despite HC2's repeated requests that they carry core children's programming. When combined with the 8.46 hours of core programming on the primary channel, the station aired an average of 2.98 hours of core programming across three channels, and thus should be deemed compliant during this quarter.

### **Third Quarter 2019**

K17JI timely filed its Third Quarter 2019 (through September 15, 2019, when the FCC's core processing guidelines changed to an annual reporting requirement) children's programming report on October 7, 2019 (FCC File Number: 0000084511). For this truncated quarter, the report indicates that the station broadcast an average of 3.5 hours of core programming on the station's primary channel. However, the report inadvertently omitted one core program broadcast on the station's primary channel. This program was called "Tiny Tots for Jesus," a qualified 30-minute core program which aired 44 times during the relevant period.<sup>8</sup> Thus, the total average per week of core programming was 5.5 hours of core programming per week during on the primary channel during the relevant period.

During this quarter, the station had two multicast channels. One of the multicast channels (CRTV) provided an average of 3.0 hours of core programming, while the other

---

<sup>7</sup> An amendment to the children's programming report for this quarter is being concurrently uploaded to the station's online public file in order to reflect these changes.

<sup>8</sup> An amendment to the children's programming report for this quarter is being concurrently uploaded to the station's online public file in order to reflect this change.

multicast channel (Revenue Frontier) provided no core programming despite HC2's repeated requests that they carry core children's programming. When combined with the 5.5 hours of core programming on the primary channel, the station aired an average of 2.88 hours of core programming across three channels, which should be rounded up to 3.0 hours to deem the station compliant during this quarter, particularly in light of the significant amounts of additional core programming aired from the Fourth Quarter of 2017 through the First Quarter of 2019 – more than 40 hours of additional core programming aired on just the primary channel alone, which was well beyond what was required.

K17JI also has been compliant with the core programming requirements as reported in its 2019 annual report and continuing through to the recently filed 2023 annual report.