

Core Programming Processing Guidelines

The Licensee has certified in the negative to the question asking whether, for the period of time covered by this application, it has complied with the Core Programming criteria and Core Programming Processing Guidelines, as required by the Commission's rules that were in effect at the time the Core Program was aired. The Licensee's certification applies with respect to the beginning of the license term, October 9, 2014 (the date the KRDO-TV's last renewal application was granted), through the present. *See Fox Television Stations, Inc.*, 33 FCC Rcd 7221 (2018), ¶¶ 31-32. This exhibit is intended to provide context to KRDO-TV's children's E/I programming performance during the license term.

The Licensee has reported it failed to meet the Core Programming Processing Guidelines for the following quarters¹ when averaged over a six-month period:

Quarter	Core Programming Hours as Reported in Children's Reports and Deficit When Averaged Over 6 Months
First Quarter 2015	2.0 hours on the main program stream – deficit of .40 hours
Second Quarter 2017	2.94 hours on the main program stream and 5.21 in the aggregate for the two multicast program streams – deficit of .01 hours on main and .20 hours on multicast
Third Quarter 2017	5.8 hours in the aggregate for the two multicast program streams – deficit of .15 hours on multicast
Fourth Quarter 2017	5.9 hours in the aggregate for the two multicast program streams – deficit of .05 hours on multicast
Second Quarter 2018	5.7 hours in the aggregate for the two multicast program streams – deficit of .15 hours on multicast
Third Quarter 2018	2.8 hours on the main program stream and 5.6 hours in the aggregate for the two multicast program streams – deficit of .10 hours on main and .35 hours on multicast
Fourth Quarter 2018	2.9 hours on the main program stream and 5.7 hours in the aggregate for the two multicast program streams – deficit of .10 hours on main and .30 hours on multicast

¹ With respect to First Quarter 2017, the Licensee reported 2.77 Core hours on the main program stream. However, there were 12 Saturdays during the quarter (KRDO-TV aired its Core Programming for the main program stream on Saturdays). Moreover, when viewed in light of the reported 4.04 Core hours on the main program stream during Fourth Quarter 2016, there was no deficit over the applicable six-month period. Similarly, with respect to the annual Report for 2020, sufficient Core Programming aired during Fourth Quarter 2020 on the main program stream when it is averaged with the prior Third Quarter 2020.

First Quarter 2019	2.9 hours on the main program stream and 5.7 hours in the aggregate for the two multicast program streams – deficit of .10 hours on main and .25 hours on multicast
Second Quarter 2019	2.9 hours on the main program stream and 5.8 hours in the aggregate for the two multicast program streams – deficit of .10 hours on main and .25 hours on multicast
Third Quarter 2019	2.9 hours on the main program stream and 5.5 hours in the aggregate for the two multicast program streams – deficit of .10 hours on main and .35 hours on multicast

KRDO-TV experienced Core Programming underages and difficulty rescheduling programs to the second home, in part, due to consistent weekend sports preemptions and its geographic location in the Mountain Time Zone (sports events that air in later morning or midday in the Eastern Time Zone impact earlier parts of the day for KRDO-TV's children's E/I programming). The Licensee made diligent efforts to reschedule programs, but unfortunately was not always successful. Even with these challenges, the underages were slight (only a few missed episodes) in for the vast majority of the impacted quarters.

Viewed against the station's aggregate performance and commitment to airing children's E/I programming across the license term and across its several program streams, the Licensee respectfully submits that the foregoing issues are merely *de minimis* for compliance purposes. In particular, "licensees are eligible for staff level approval if they demonstrate that they have aired a package of different types of educational and informational programming that, while containing somewhat less core programming than indicated by the applicable guideline, demonstrates a level of commitment to educating and informing children at least equivalent to airing the amount of programming indicated by the guideline." *In re Children's Television Obligations of Digital Television Broadcasters*, 21 FCC Rcd 11065, 11102 n.141 (2006). Across the license term, and as can be seen from the relevant Children's Television Programming Reports, the licensee has satisfied and often exceeded the safe harbor processing average, particularly on the station's multicast channels where the station consistently aired more than the minimums required for multicast streams. In fact KRDO-TV over-performed on the multicast program streams for 15 quarters during the license term. When viewed in the context of these circumstances, the slight shortfalls averaged over six months may properly be determined to be *de minimis*.

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