

Core Programming Processing Guidelines

Licensee requires its stations to comply with all FCC rules, including the rules on children's programming. KOAA-TV's compliance with the FCC's children's programming requirements is detailed in the quarterly and annual children's television programming reports that KOAA-TV has filed with the FCC, all of which are incorporated by reference into the instant amendment.

During the current license term, KOAA-TV consistently aired programming that met the educational and informational needs of children ("Core Programming"). While most of KOAA-TV's Core Programming aired as scheduled, due to changes in programming from the station's programming provider on the primary stream, some episodes of the programs needed to be preempted. Preempted Core Programs usually were rescheduled so viewers were able to watch the programs in accordance with Commission rules. In a few instances in the first quarter of 2021, however, three episodes of Core Programs were preempted and rescheduled in a manner that may not have strictly complied with the rules the FCC adopted to reschedule preempted Core Programming. Specifically, station personnel aired episodes of *NBC Nightly News with Lester Holt: Kids Edition*, because station personnel mistakenly believed it qualified as a Core Program. However, after further diligence, station personnel came to understand that while the program serves the educational and informational needs of children, it does not include the E/I logo during the program. As a result of this inadvertent error, the station aired 24.5 of Core Programming in the first quarter. KOAA-TV notes, however, that over the course of the license term the station averaged significantly more than three hours of children's programming per week when including all children's programming that aired on the station. For example, over the course of 2021, the station aired an average of 31.6 hours of Core Programming each quarter on its primary stream and over 100 hours of Core Programming each quarter on its multicast streams. Other than the instances noted above, all of which were in first quarter of 2021, the station complied with the standard Core Programming processing requirements for the rest of the station's license term.

While KOAA-TV asserts that it substantially and materially complied with the Core Programming processing guidelines and that any shortages were de minimis, KOAA-TV also notes that throughout the license term, the station demonstrated a commitment to educating and informing children that is at least equivalent to airing three hours per week of Core Programming because KOAA-TV aired other programming that contributes to the educational development of children. For example, throughout the license term, the station aired numerous news segments aimed at providing updates for children and their parents. The station also aired several stories that highlighted many of the achievements of students in the viewing area.¹ And recently, throughout the pandemic the station has provided families with information regarding changes to school schedules, vaccines, and other public health information.

KOAA-TV also participates in and gives on-air support to numerous community initiatives that support children and families. For example, KOAA-TV has partnered with Scripps Howard Foundation to provide underserved children with the opportunity to build home libraries with books the children have chosen themselves.

¹ See, e.g., N. Chuck, *Special Needs Students Build Blessing Box*, KOAA-TV.com (Nov. 12, 2021), <https://www.KOAA-TV.com/news/covering-colorado/special-needs-students-build-blessing-box>.

Overall, as demonstrated herein and its children's television programming reports, KOAA-TV has shown a commitment to ensuring the children of Colorado Springs are educated and informed and ready to meet the challenges of the 21st century. The station has redoubled its efforts to ensure that the station airs sufficient Core Programming to meet the processing guidelines in the FCC's children's programming rules.