

WPPT(TV), Philadelphia, Pennsylvania  
License Renewal Application  
DTV/Class A Certification  
Core Programming Processing Guidelines and E/I Symbol

Lehigh Valley Public Telecommunications Corp. (“Lehigh Valley”), licensee of noncommercial educational television station WPPT(TV), Philadelphia, Pennsylvania, is not able to certify that it met the FCC’s 3 hour per week renewal “processing guideline” for CORE programming or the E/I Symbol requirements for WPPT(TV) throughout the portion of the station’s current license term that Lehigh Valley was its licensee.<sup>1</sup> Accordingly, Lehigh Valley requests processing of its children’s television compliance determination by the Commission, as set forth in Section 73.671 of the FCC’s rules, based on its sponsorship of Core educational informational programs on its co-owned public TV station in the market and other special non-broadcast efforts by Lehigh Valley.

There can be no question of Lehigh Valley’s strong and deep commitment to educational and informational television programming for children and to the educational and informational needs of children in Philadelphia, the Lehigh Valley, and the other communities it serves. The licensee, Lehigh Valley, is a community organization with a 3-member Education team; Lehigh Valley offers a unique variety of special services for the education community, including educational television programming and teacher professional development and resources, 24 hours, daily; parent resources; adult learning opportunities; extensive outreach services and other special programs and events. *See* <https://www.wlvt.org/education/>

During the early days of the COVID pandemic, Lehigh Valley was one of the first stations to pivot towards delivering K-12 programming over broadcast to try to help meet the educational needs of children during the pandemic. To develop the curriculum, Lehigh Valley worked with the Allentown and Bethlehem Area school districts, both of which have a number of students who do not have access to the internet. *See* <https://www.mcall.com/2020/03/26/pbs39-launches-educational-programing-for-lehigh-valley-students-home-during-coronavirus-outbreak/>

Moreover, Lehigh Valley’s co-owned noncommercial educational television station – WLVT-TV in Bethlehem, Pennsylvania – broadcasts the traditional PBS children’s programming on its primary channel. As a PBS member station, WLVT-TV is required to broadcast at least seven (7) hours of children’s programming each weekday. Thus, Lehigh Valley provides at least 35 hours of CORE children’s programming each week – over 10 times the amount required by the FCC’s 3-hour/channel/week processing guideline.

With the exception of the K-12 programming during 2020, WPPT(TV)’s primary program stream has not featured traditional PBS children’s programs because of the

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<sup>1</sup> Lehigh Valley acquired the license of WPPT(TV) on March 15, 2018. *See* BALEDT-20180105AAT.

overwhelming amount of those programs on its co-owned “sister” station, WLVT-TV. In view of the very large amount of hours of children’s programs broadcast on WLVT-TV (its other station serving the coverage area), Lehigh Valley focused the WPPT(TV) programming on other audiences.

However, recognizing the simplicity of the three-hour-per-channel-per-week renewal “processing guideline” and upon the advice of counsel, Lehigh Valley added three weekly hours of traditional PBS children’s programming to WPPT(TV) to readily comply with the renewal “processing guideline” from that date forward.

Lehigh Valley believes that, as a whole, its local endeavors over the license term, including the efforts of its Education team and the ample children’s television programming broadcast over WLVT (as well as the pandemic-related programming shift of WPPT(TV)) are sufficient to warrant license renewal for noncommercial educational station WPPT(TV).

Lehigh Valley stands ready to supply additional information on its compliance with the Children’s Television Act upon request.