



LEVENTHAL SENTER & LERMAN PLLC

To All Television Clients

May 7, 2007

**FCC SEEKS COMMENTS ON CHILDREN'S TELEVISION PROGRAMMING AND COMPLIANCE WITH THE CHILDREN'S TELEVISION ACT**

**COMMENTS DUE JUNE 1, 2007  
REPLY COMMENTS DUE JUNE 18, 2007**

We recently notified you that the FCC is requesting comments on the status of children's television programming and whether television station licensees are complying with the Children's Television Act ("CTA"). The purpose of this update is to notify you that comments in this proceeding are due on or before June 1, 2007, with reply comments due on or before June 18, 2007.

As we noted in our initial Memorandum, the FCC's rules define a "core" children's program as one that is a regularly scheduled weekly program, at least 30 minutes in duration aired between the hours of 7:00 a.m. and 10:00 p.m., a significant purpose of which is to serve the educational and informational needs of children ages 16 and under. In addition, a qualifying program must be identified as a children's educational and informational program to publishers of program guides and on the air, and its educational objective and target audience must be listed in the TV station's quarterly Form 398 Children's Television Programming Reports.

The FCC has sought comment on the following issues:

▶ Are television station licensees complying with the CTA?

▶ Does the programming that television station licensees have reported as core children's programming generally satisfy the FCC's definition of such programming?

▶ Are the FCC's core programming criteria adequate to properly define educational and informational programming, and do these criteria fulfill the requirements of the CTA?

▶ Does the current level of preemptions of core programming affect compliance with the CTA and Congressional intent?

▶ In what other ways are television station licensees complying, or not complying, with the CTA and the FCC's rules relating to children's programming?

Should you wish to file comments in this proceeding or have any questions concerning the FCC's children's television rules, please contact our office.

*Leventhal Senter & Lerman PLLC*

This memorandum is intended only as a general discussion of these issues and should not be regarded as legal advice. We would be pleased to provide additional details or advice about specific situations if desired. To discuss any of the issues presented here, please contact any attorney in our office.