

Before the **FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

In the Matters of:	)	
	)	
Applications of Comcast Corporation,	)	MB Docket No. 10-56
General Electric Company and NBC	)	
Universal, Inc. for Consent to Assign	)	
Licenses or Transfer Control of Licenses	)	
	)	
and	)	
	)	
Application of NBC Telemundo	)	File No. BALCDT - 20100517ADJ
License, LLC to Assign the Licenses of	)	
KWHY-TV, Los Angeles, CA (26231);	)	
K46GF, Santa Maria, CA (64975);	)	
K47GD, San Luis Obispo, CA (19780)	)	
to Bahia Honda LLC, as Trustee	)	

FILED/ACCEPTED

JUN 21 2010

To: Commission's Secretary, Office of the Secretary  
Attn.: Video Division, Media Bureau

Federal Communications Commission  
Office of the Secretary

**PETITION TO DENY FCC APPLICATIONS**

Rita Guajardo Lepicier, a producer of educational and informational programming who resides in the Los Angeles area and is a viewer of KWHY-TV, files this Petition to Deny FCC Applications against (1) the Comcast/NBC merger applications, and (2) NBC's application to assign KWHY-TV, Los Angeles, California to a trust (controlled by a trustee picked by NBC) likely to perpetuate the poor performance of the station under NBC's control, particularly regarding children's educational programming. NBC, which also owns TV stations KNBC and KVEA in Los Angeles, has operated KWHY as an afterthought during its nearly decade-long "temporary" waiver of the FCC's ownership rules, and its lack of attention to meeting

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its educational obligations to the Hispanic children of Los Angeles has now deprived an entire generation of the benefits of the educational and informational programming required of an FCC license holder. To prevent future generations from being similarly harmed, prior to even considering approval of Comcast's merger with NBC, the FCC must require that NBC live up to its 2001 commitment when acquiring KWHY to promptly divest KWHY, preferably to a Hispanic owner, that will restore the station's presence as an independent Spanish-language voice in the nation's largest Hispanic community, while providing for the educational and informational needs of local Hispanic children.

***I. The FCC's Own Records Show NBC's Disinterest in Meeting KWHY's Children's Educational Programming Obligations***

According to the FCC's website, KWHY-TV's license was last renewed in 1998 under a prior owner. NBC filed a license renewal application in 2006 which has not been granted (BRCT-20060810ACB). According to Exhibit 18 of that application, despite the pledge NBC made to the FCC to operate KWHY-TV independently in order to obtain its temporary ownership waiver,<sup>1</sup> NBC promptly moved KWHY's main studios to NBC's Burbank studios. Exhibit 18 says that twelve months after the move began, and shortly after the move was completed (no explanation as to why

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<sup>1</sup> Application for Consent to Transfer Control of Entity Holding Broadcast Station Construction Permit or License (BTCCT-20011101ACI), Exhibit 17, Page 7 ("Third, NBC pledges to operate Station KNBC independently of Stations KVEA and KWHY-TV during the period of common ownership."), Page 9, Footnote 29 ("Moreover, any concerns regarding diminished diversity are mitigated by NBC's pledge to operate the Telemundo stations independently from KNBC during the waiver period, a factor which the FCC has found persuasive in granting temporary waivers."), Page 12 ("In support of its waiver request, NBC pledges to operate Station KNBC independently from Stations KWHY-TV and KVEA, to maintain the stations' separate programming strategies, to continue competing in the Los Angeles market, and to refrain from engaging in joint sales in that market."). NBC conceded in a March 22, 2005 letter to the FCC (Page 2) that it violated its joint sales pledge in 2003 by permitting joint sales for some period of time following a proposed change in the FCC's ownership rules that never went into effect (included in this Petition in *Attachment E*).

the move took twelve months), "it was discovered that some of the station's files were missing, including the public inspection file."

The public inspection file was never located, as the exhibit goes on to say that efforts were made to build a new file, which the exhibit asserts was eventually completed. The exhibit then states that "Subsequently, the station discovered that some of the children's commercial limits certifications were not placed in the public inspection file on a timely basis." It isn't clear why this wouldn't have been discovered in recreating the file, but it is the first indication of NBC's carelessness with regard to KWHY's children's programming.

Looking at the station's Children's Educational Programming submissions on the FCC's website confirms that inattention to its obligations regarding children's programming has been the rule, and not the exception. According to the FCC's website, the first quarter 2007 Children's Report wasn't filed until 2008, the first quarter Children's Report for 2009 wasn't filed until October of that year, and the Children's Reports for BOTH the second and third Quarters of 2009 WERE NEVER FILED AT ALL (printouts from the FCC website of the KWHY Children's Reports from January 2007 to present are *Attachment A* of this Petition).

The failure to file these reports on time, or at all, is symptomatic of the station's inattention to children's educational needs under its current ownership, but not nearly so much so as the content of those reports. Even a brief look at these reports reveals that

- Since the third quarter of 2006, the station's Children's Reports direct viewers seeking further information to [www.canal22.com](http://www.canal22.com). However, as shown in *Attachment B* to this Petition, that web address leads to an unrelated website listing Spanish-language employment services.

- The station's Children's Reports indicate that the station has NEVER aired core educational programming on its digital channel, listing "0.00" hours of digital core educational programming every quarter (except for quarters where no report was filed at all) since the beginning of 2007. Even after stations were required to stop analog broadcasts in 2009, KWHY's Children's Reports continue to say that the station is airing 3.0 hours per week of analog core educational programming, and 0.00 hours of digital core educational programming. This is clearly in error, as what the reports indicate is impossible, but it shows that no one is even reviewing the reports before they are filed, and that the station is merely copying information from the last report.
- The number of episodes of an educational program claimed as being aired in a quarter are often incorrect. For example, every report says that a program that aired three times a week aired 39 times that quarter, even when that is not correct. As an example, the Children's Report for the first quarter of 2009 says that *Angelitos* aired on Mondays, Wednesdays and Fridays, for a total of 39 airings, when there were only 38 Mondays, Wednesdays and Fridays in that quarter. The same is true of *Zooterapia* in the first quarter of 2010, where the Children's Reports say it aired 39 times on Mondays, Tuesdays and Thursdays, when there were only 38 Mondays, Tuesdays and Thursdays in that quarter. This may have been balanced by quarters where the Children's Report says 39 episodes were aired but the calendar says 40 (for example, *Angelitos* in the fourth quarter of 2008), but this just confirms that the station was copying the information from the last Children's Report without even pulling out a calendar to confirm the dates episodes aired.
- Each of the Children's Reports since the beginning of 2007 states that KWHY notifies publishers of program guides about its analog core educational programming, but affirmatively *has not* notified these publishers of digital core educational programming, even after analog broadcasts stopped. Assuming that is another careless mistake, the Children's Reports after 2006 also list only cable systems as being notified of analog children's core educational programming, and does not list publishers like The Los Angeles Times, TV Guide, La Opinion or other Spanish-language publishers as being contacted. The reduction in notices is very apparent when compared to the station's 2006 Children's Reports which list these and many other publishers being notified of core educational programming. While some of these publishers may have cut back their TV listings since 2006, they obviously can't even consider listing educational programs they aren't notified about.
- At least in recent years, the station has claimed to air two half-hour long shows to reach exactly three hours of core educational programming per week, with one show generally airing "Monday's Tuesday's and Thursday's 8:00-8:30" and the second show airing "Monday's Wednesday's and Friday's 8:30-9:00AM" (these reports can be found in *Attachment A*). Moving beyond how young children can reliably locate such erratically scheduled programming, the programming is aired solely during the times when children are at or on their way to school each weekday morning,

ensuring that children can't watch the programming anyway, except perhaps during school vacations.

- I have watched the children's educational programming aired by KWHY under its current ownership, and it does not alter my impression that the station is paying scant attention to its obligation to provide educational programming. According to the Children's Reports filed by the station on the FCC's website, from January 2007 to March 2010, the station has relied entirely on the same four programs for its educational programming, rerunning the same episodes over and over, and only on weekday mornings. According to these reports, the station has never aired an educational program during a weekend, or after school.
- The most current report at the FCC shows the station airing *Zooterapia* and *Angelitos* for its educational programming. The English-language description of *Zooterapia* in the reports describes the program as "ZOOTERAPIA: The most moving stories of the recovery of patients thanks to animal therapy. An amazing way of healing that means of [sic] breakthrough for science."<sup>2</sup> In 2007, the station said the program was targeted at children 7-12, but more recent reports have changed the age range to 8-10. If handled in an educational manner, perhaps a single program episode discussing the use of animals in medical therapy might have educational value, but since March of 2007, KWHY claims to have aired *Zooterapia* 234 times. Since *Zooterapia* was airing before and after the two unfiled Children's Reports in 2009, it is likely that it aired throughout that six month period as well, bringing the total to over 300 airings in three years. What a wasted opportunity to educate our children.
- *Angelitos* does not improve the situation. The English-language description in KWHY's Children's Report is: "ANGELITOS children from the Americas reflect on alien life, ghosts, myths, mysteries, alternative [sic] lifestyle, death, and God, expressing views that are likely to contain truths no [sic] yet confronted with those of the cultural establishment, thus contributing unexpected visions on the main existential queries of human kind."<sup>3</sup> That the description seeks to put an educational spin on a non-educational program is apparent when the most recent Children's Reports claiming *Angelitos* as educational programming lists the targeted age range for these "unexpected visions of the main existential queries of human kind" as 3 to 6 year-old children!<sup>4</sup>
- The remaining two programs claimed as educational in the Children's Reports are *El desvan del tio Ivan* and *El Cuarto de los Triques*. Unlike the other programs, the

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<sup>2</sup> The description is from the Children's Report for the second quarter of 2007. More recent reports describe the program in Spanish, and leave out any reference to a "breakthrough for science".

<sup>3</sup> The description is from the Children's Report for the second quarter of 2007. More recent reports provide a somewhat similar description of the program in Spanish.

<sup>4</sup> This is the age range given for *Angelitos* in most of the Children's Reports. Like *Zooterapia*, the station did not always provide the same age range for the program. In the second quarter of 2007, the age range was listed as 5-8 year-olds, and in the first quarter of 2009, as 8-10 year-olds.

producers of *El desvan del tío Ivan*, which is frequently sold on DVD, at least claim that the program is intended to have an educational aspect, although their DVDs give the target age range as 4-7 (*Attachment C*), instead of the 7-12 age range stated in KWHY's Children's Reports in *Attachment A*. The final program, *El Cuarto de los Triques*, is unknown to me, and I am not aware of any other station airing it as educational programming.

- It is also not clear to me that the station is actually airing the programs claimed in its Children's Reports. Included in *Attachment D* are program grids from an LA Times website for sample weeks in November 2009 (<http://latimesblogs.latimes.com/showtracker2009/11/index.html>) and March 2010 (<http://latimesblogs.latimes.com/showtracker2010/03/index.html>). Both indicate that a program entitled *Y Tu Que Quieres Ser* aired at the exact times that the Children's Reports indicate that *Angelitos* and *Zooterapia* were supposed to be airing as the station's educational programming.
- All of the Children's Reports in *Attachment A* (first quarter 2007 to first quarter 2010) say that the station aired exactly 3.0 hours/week of educational programming, consisting entirely of the four named programs. Since a significant portion of these programs are not actually educational programs (assuming they aired at all), the station has not been airing anything close to the three hours per week of required educational programming.

A finding by the FCC that even three of the four programs were educational would still leave KWHY far short of the three hour minimum, and the station's Children's Reports emphasize that under its current ownership, serving the educational needs of children's has been a low priority. KWHY itself has been operated only as an afterthought to sibling stations KNBC and KVEA, and KWHY demonstrates why allowing someone to own three local TV stations is a bad idea.

## ***II. The FCC Must Not Allow NBC to Use a Trustee to Continue Its Neglect of What Used to Be One of the Most Vibrant Stations in Los Angeles***

As a long-term producer of educational and informational programming, I may be most sensitive to KWHY's failings in my own field, but the station's failings in that regard are just symptomatic of a broader decline in the station's operations since it was taken over by NBC in 2002 under a "temporary waiver". The purpose of this

Petition against both the Comcast/NBC merger application and NBC's application to transfer KWHY to a trust (to avoid divesting the station to a truly independent party) is not to obtain fines against the current license holder, which would accomplish nothing for the residents of Los Angeles, but to demand that KWHY's sorry current state under NBC not be allowed to continue. The "temporary" waiver must be terminated. While I understand that in trying to get FCC approval for the Comcast/NBC merger, NBC has indicated that it will either sell KWHY or put it into a trust, placing the station in the hands of a trustee (especially one selected by NBC) will just continue the "warehoused" status of KWHY.

The FCC should not approve the transfer of the station into an NBC trust where it will languish still longer. In NBC's waiver request in 2001, it said

"a temporary waiver will serve the public interest by preserving a Spanish-language outlet while allowing an orderly disposition of one of the Telemundo-owned stations in the Los Angeles DMA, which will substantially enhance the possibility that the station will be sold to a qualified buyer who will appreciate and foster the unique characteristics of the divested station."<sup>5</sup>

It is impossible to believe that no buyer like that has arisen in the almost nine years since NBC made that statement, nor should the people of Los Angeles have to settle for anything less now, whether it be a trustee or a multiple station owner. The FCC should not approve the trust transfer application, and should not even consider the Comcast/NBC merger, until KWHY is safely in the hands of an independent owner that will restore the diversity in the Los Angeles area that KWHY used to provide.

From what I have been able to determine from NBC's quarterly reports on its waiver at the FCC (included with this Petition as *Attachment E*), the issue is not

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<sup>5</sup> Application for Consent to Transfer Control of Entity Holding Broadcast Station Construction Permit or License (BTCCT-20011101ACI), Exhibit 17, Page 3.

locating a buyer that will “foster the unique characteristics of the divested station,” but persuading NBC to let go of the station. Its July 2002 report says it was “actively involved in discussions with several interested parties.” Its October 2002 report says it “is reviewing inquiries from other parties as to a possible sale of KWHY-TV and will continue to evaluate such expressions of interest as the Company learns of them.” In January 2003, it is talking to two new buyers and “reviewing other approaches to attracting additional potential purchasers, including parties that would be interested in maintaining the station’s unique character as the country’s oldest independent Spanish-language full-power television broadcast outlet.” In March 2003, NBC asked for its waiver to be extended (included with this Petition as *Attachment F*) because of “unforeseen changes in regulatory and market conditions” (Page 1) and adding that “GE hired a new vice president in its broadcasting Business Development group, who, among his primary tasks, has pursued proposals and overseen efforts to divest KWHY-TV” (Page 5). Ironically, in this 2003 request, NBC dismisses “the always speculative argument that GE would ‘starve’ its Spanish-language stations.” (Page 10).

By the March 2005 waiver report, NBC appears to have given up even the pretense of looking for buyers, saying only that “the Company has not received any third-party offers to purchase KWHY-TV.” The April 2005 waiver report says only that “the Company continues to employ a vice president in its broadcasting Business Development group, who has overseen efforts to divest KWHY-TV.” I guess that vice president was lucky to “continue to be employed”, since he had failed to sell KWHY, one of his “primary” tasks from over two years before. By July of 2005, the

vice president “continues to oversee efforts by which the Company may come into compliance with the Rule, and the Company has not received any third-party offers to purchase KWHY-TV.” Later quarterly waiver reports mostly copy this language, no longer pretending that NBC is taking any steps to sell KWHY.

The FCC has no reason to believe that situation has changed now, and allowing NBC to transfer KWHY to its selected trustee just moves the responsibility for continuing to oversee efforts to sell KWHY from that weary vice president to a trustee still passing KWHY’s profits to NBC. Even if the trustee is motivated to eventually sell the station, NBC can easily reject a sale by setting an unrealistic minimum price, leaving KWHY “parked” with the trustee as it merges with Comcast.

In declining offers for KWHY, NBC might well say that this “will serve the public interest by avoiding a forced sale in a very difficult economic climate, which will in turn enhance the likelihood that a suitable buyer will be found who will value and preserve the unique characteristics of one of the nation’s oldest Spanish-language television stations.” However, that quote is from NBC’s original 2001 waiver request<sup>6</sup> (Page 7), which proceeded to say that

“Regrettably, these are not ordinary economic times. Prior to the September 11 attacks, it was widely reported that the slowing economy had decimated the earnings of broadcast stations all around the country, including the major markets. The decline in advertising revenues, in turn, has depressed station values and station sales and has led to diminished availability of capital to finance station acquisitions. The economic and political uncertainties caused by the attacks have exacerbated the downward trend. Further, the unique format and focus of these Spanish-language stations means that it likely will take longer to find a suitable buyer, particularly if the Spanish-language format is to be maintained. Under these circumstances, equity and the public interest favor a 12-month waiver.” (Pages 14-15).

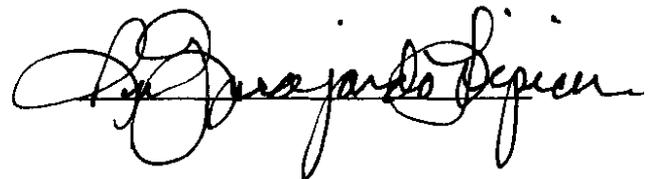
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<sup>6</sup> Application for Consent to Transfer Control of Entity Holding Broadcast Station Construction Permit or License (BTCCT-20011101ACI), Exhibit 17.

Those 12 months passed over seven years ago. Since then, the economy boomed while NBC held on to KWHY, and now it has gone bust, and NBC can't be allowed to wait any longer before placing the station in the hands of that "suitable buyer" that can bring KWHY back to its former Spanish-language prominence as an independent community leader rather than a languishing corporate doorstop. The FCC should reject NBC's application to transfer KWHY to its trustee, which would continue the station's steady decline on NBC's watch. Rather, the FCC should require that the station now be sold, not just to whomever will best enrich NBC after its years of delay, but to the owner NBC has been promising the FCC for nearly a decade, "a qualified buyer who will appreciate and foster the unique characteristics of the divested station."<sup>7</sup> Thank you for your consideration of this matter, and please take this opportunity to do right by the people of Los Angeles.

Sincerely,

Rita Guajardo Lepicier

A handwritten signature in black ink, appearing to read "Rita Guajardo Lepicier", written in a cursive style.

Rita Guajardo Lepicier  
8409 East Larkdale Road  
San Gabriel, CA 91775

June 21, 2010

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<sup>7</sup> Application for Consent to Transfer Control of Entity Holding Broadcast Station Construction Permit or License (BTCCT-20011101ACI), Exhibit 17, Page 3.

Declaration

I, Rita Guajardo Lepicier, do hereby declare under penalty of perjury that I have reviewed my Petition to Deny FCC Applications, and except for matters which cite the records of the FCC or other sources, the facts in the Petition to Deny FCC Applications are true to the best of my personal knowledge and belief.



Rita Guajardo Lepicier

June 18, 2010

# ATTACHMENT A

Federal Communications Commission  
Washington, DC 20554

Approved by OMB  
3060-0754

## FCC 398 Children's Television Programming Report

Report reflects information for the filing period ending 03/31/2007 Filed on 01/04/2008

Call Sign	Channel Numbers	Community of License			
		City	State	County	ZIP Code
KWHY	22 (analog)	Los Angeles	CA	Los Angeles	91523
	42 (digital)				
Licensee Name					
Telemundo Los Angeles License Corp.					
Network Affiliation		Nielsen DMA	Licensee World Wide Web Home Page Address (if applicable)		
		Los Angeles	www.canal22.com		
Facility ID	Previous Call Sign (if applicable)		License Renewal Expiration Date		
26231			2006-12-01		

### Analog Core Programming

2. State the average number of hours of Core Programming per week broadcast by the station. See 47 C.F.R. §73.671(e).
- |            |
|------------|
| 3.00 hours |
|------------|
3. (a) Does the Licensee provide information identifying each Core Program aired on its station, including an indication of the target child audience, to publishers of program guides as required by 47 C.F.R. §73.673?
- |   |
|---|
| Y |
|---|
- (b) Identify publishers who were sent information in 3(a)
- AVENUE TV CABLE SERVICE AVISO DE OCASION BUENA VISTA TELEVISION CABLEVISION INDUSTRIES CHAPTER COMMUNICATION CEO CHAPTER MEDIA TRISTAR TELEVISION DISTRICT COX CABLE SAN DIEGO COX

4. Complete the following for each program that you aired during the past three months that meets the definition of Core Programming. Complete chart below for each Core Program

Title of Analog Core Program #1		Origin	
El Cuarto de los Triques		LOCAL	
Regular Schedule	Total Times Aired at Regularly Scheduled Time	Number of Pre-emptions	
Mondays, Wednesday & Friday 7:00-7:30	39	0	
Length of Program	Age of Target Audience		L-E Symbol Used As Required
	30 minutes	From 5 years	
Describe the educational and informational objective of the program and how it meets the definition of Core Programming			
Cuarto de los Triques: Takes place in a room full of trinkets, knick knacks and gadgets that have a life of their own. A boy named Jorge and his best friend, a robot named Desperdicop, present scientific and cultural topics with experiments, rafts, stories, and other usual activities.			
Title of Analog Core Program #2		Origin	
El Desvan del Tio Ivan		LOCAL	
Regular Schedule	Total Times Aired at Regularly Scheduled Time	Number of Pre-emptions	

Tuesday and Thursdays 7:00-7:30am		26	0
Length of Program	Age of Target Audience		E/I Symbol Used As Required
30 minutes	From	To	
	7 years	12 years	Y
Describe the educational and informational objective of the program and how it meets the definition of Core Programming			
Tio Ivan: Is a live character that shares many adventures with his best friend, a life size puppet sheep dog. Whether at home or in the community, stories and other values are at the center of each segment.			
Title of Analog Core Program #3			Origin
El Desvan del Tio Ivan			LOCAL
Regular Schedule	Total Times Aired at Regularly Scheduled Time		Number of Pre-empptions
Mondays 7:30am-8:00am	13		0
Length of Program	Age of Target Audience		E/I Symbol Used As Required
30 minutes	From	To	
	7 years	12 years	Y
Describe the educational and informational objective of the program and how it meets the definition of Core Programming			
Tio Ivan: Is a live character that shares many adventures with his best friend, a life size puppet sheep dog. Whether at home or in the community, stories and other values are at the center of each segment.			

### Non-Core Educational and Informational Programming

5. Complete the following for each program that you aired during the past three months that is specifically designed to meet the educational and informational needs of children ages 16 and under but does not meet one or more elements of the definition of Core Programming. See 47 C.F.R. §73.671. Complete chart below for each additional such educational and informational program.

[There are no analog non-core program reports.]

### Sponsored Core Programming

6. List Core Programs, if any, aired by other analog stations that are sponsored by the Licensee and that meet the criteria set forth in 47 C.F.R. §73.671. Also indicate whether the amount of total Core Programming broadcast by another station increased.

[There are no analog sponsored core program broadcast reports.]

[There are no analog sponsored core program detail reports.]

### Digital Core Programming

7. (a) State the average number of hours of Core Programming per week broadcast by the station on its main program stream
- (b) Did the Licensee broadcast on its main digital program stream the same Children's Core Programming provided on its analog channel?
- (c) If Yes to 7(b), the Licensee certifies that the representations and children's program information provided with respect to its analog channel apply equally with respect to its main digital program stream.
- If No to 7(c), submit as an Exhibit a Statement of Explanation
8. (a) State the average number of hours per week of free over-the-air digital video programming broadcast by the station on other than its main program stream
- (b) State the average number of hours per week of Core Programming broadcast by the station on other than its main program stream. See 47 C.F.R. §73.671

0.00 hours
Y
Y
(None Required)
0.00 hours
0.00 hours

9. (a) Does the Licensee provide information identifying each Core Program aired on its station, including an indication of the target child audience, to publishers of program guides as required by 47 C.F.R. §73.673? N
- (b) Identify publisher(s) who were sent information re 9(a)
- 
10. Complete the following for each program that you aired during the past three months that meets the definition of Core Programming. Complete chart below for each Core Program.
- [There are no digital core program reports.]*
11. (a) Does the Licensee certify that at least 50% of the Core Programming oriented toward meeting the additional programming guideline (applied to free video programming aired on other than the main program stream) did not consist of program episodes that had already aired within the previous seven days either on the station's main program stream or on another of the station's free digital program streams? Y
- (b) If No, submit as an Exhibit a Statement of Explanation setting forth the number of repeats in excess of the repeat limit and the times and dates the episodes involved were aired. (None Required)

### Non-Core Educational and Informational Programming

12. Complete the following for each program that you aired during the past three months that is specifically designed to meet the educational and informational needs of children ages 16 and under, but does not meet one or more elements of the definition of Core Programming. See 47 C.F.R. §73.671. Complete chart below for each additional such educational and informational program.
- [There are no digital non-core program reports.]*

### Sponsored Core Programming

13. List Core Programs, if any, aired by other stations that are sponsored by the Licensee and that meet the criteria set forth in 47 C.F.R. §73.671. Also indicate whether the amount of total Core Programming broadcast by another station increased.
- [There are no digital sponsored core program broadcast reports.]*
- [There are no digital sponsored core program detail reports.]*

### Other Matters

14. Complete the following for each analog and digital program that you plan to air for the next quarter that meets the definition of Core Programming. Complete chart below for each Core Program, identifying whether it is to be broadcast on the station's analog or digital channel or both channels.
- [There are no planned core program reports.]*
15. Does the Licensee publicize the existence and location of the station's Children's Television Programming Reports (FCC 398) as required by 47 C.F.R. §73.352(e)(1)(iii)?
16. Identify the licensee's children's programming liaison.

Name	Telephone Number
Victor Franco	818-260-5752
Address	E-mail Address
3000 W. Alameda Ave.	victor.franco@nbcuni.com
City	State
Burbank	CA
	ZIP Code
	91523

17. Include any other comments or information you want the Commission to consider in evaluating your compliance with the Children's Television Act (or just the space for supplemental explanations). This may include information on any other non-core educational and informational programming that you aired this quarter or plan to air during the next quarter, or any existing or proposed non-broadcast efforts that will enhance the educational and informational value of such programming to children. See 47 C.F.R. §73.671, NOTES 2 and 3.

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name of Licensee	Signature
Victor Franco	

Date	
1/04/2008	

Federal Communications Commission  
Washington, DC 20554

Approved by OMB  
3060-0754

## FCC 398 Children's Television Programming Report

Report reflects information for the filing period ending 06/30/2007 Filed on 07/11/2007

Call Sign	Channel Numbers	Continuum of License			
<b>KWHY</b>	22 (analog)	City	State	County	ZIP Code
	42 (digital)	<b>Los Angeles</b>	<b>CA</b>	<b>Los Angeles</b>	<b>91523</b>
Licensee Name					
<b>Telemundo Los Angeles Licence Corp.</b>					
Network Affiliation		Nielsen DMA		Licensee World Wide Web Home Page Address (if applicable)	
		<b>Los Angeles</b>		<b>www.canal22.com</b>	
Facility ID		Previous Call Signs (if applicable)		License Renewal Expiration Date	
<b>26231</b>				<b>2006-12-01</b>	

### Analog Core Programming

2. State the average number of hours of Core Programming per week broadcast by the station. See 47 C.F.R. §73.671(c).
- |                   |
|-------------------|
| <b>3.00 hours</b> |
|-------------------|
3. (a) Does the Licensee provide information identifying each Core Program aired on its station, including an indication of the target child audience, to publishers of program guides as required by 47 C.F.R. §73.673?
- |          |
|----------|
| <b>Y</b> |
|----------|
- (b) Identify publishers who were sent information as 3(a).

Avenue TV CABLE SERVICE AVISO DE OCASION BUENA VISTA TELEVISION CABLEVISION INDUSTRIES CHAPTER COMMUNICATION CEO CHARTER MEDIA COLUMBIA TRISTAR TELEVISION DIST COX CABLE SAN DIEGO COX

4. Complete the following for each program that you aired during the past three months that meets the definition of Core Programming. Complete chart below for each Core Program.

Title of Analog Core Program #1	Origin
<b>Angelitos</b>	<b>LOCAL</b>
Regular Schedule	Total Times Aired at Regularly Scheduled Time
<b>Monday, Wednesday, Friday 7:00-7:30am</b>	<b>39</b>
Length of Program	Age of Target Audience
<b>30 minutes</b>	From <b>5 years</b> To <b>8 years</b>
E-I Symbol Used As Required	
<b>Y</b>	

Describe the educational and informational objective of the program and how it meets the definition of Core Programming.

**ANGELITOS** children from the Americas reflect on alien life, ghosts, myths, mysteries, alternative lifestyle, death, and God, expressing views that are likely to contain truths not yet confronted with those of the cultural establishment, thus contributing unexpected visions on the main existential queries of human kind.

Title of Analog Core Program #2	Origin
<b>Zooterapia</b>	<b>LOCAL</b>
Regular Schedule	Total Times Aired at Regularly Scheduled Time

Tuesdays and Thursdays 7:00-7:30am		26	0
Length of Program	Age of Target Audience		E/I Symbol Used As Required
30 minutes	From	To	
	7 years	12 years	Y
Describe the educational and informational objective of the program and how it meets the definition of Core Programming			
ZOOTERAPIA: The most moving stories of the recovery of patients thanks to animal therapy. An amazing way of healing that means of breakthrough for science			

Title of Analog Core Program #3		Origin
Zooterapia		SYNDICATED
Regular Schedule	Total Times Aired at Regularly Scheduled Time	Number of Pre-Emptions
Mondays	13	0
Length of Program	Age of Target Audience	
30 minutes	From	To
	7 years	12 years
E/I Symbol Used As Required		
Y		
Describe the educational and informational objective of the program and how it meets the definition of Core Programming		
ZOOTERAPIA: The most moving questions of the recovery of patients thanks to animal therapy. An amazing way of healing that means a breakthrough for science		

### Non-Core Educational and Informational Programming

5. Complete the following for each program that you aired during the past three months that is specifically designed to meet the educational and informational needs of children ages 16 and under but does not meet one or more elements of the definition of Core Programming. See 47 C.F.R. §73.671. Complete chart below for each additional such educational and informational program.

[There are no analog non-core program reports.]

### Sponsored Core Programming

6. List Core Programs, if any, aired by other analog stations that are sponsored by the licensee and that meet the criteria set forth in 47 C.F.R. §73.671. Also indicate whether the amount of total Core Programming broadcast by another station increased.

[There are no analog sponsored core program broadcast reports.]

[There are no analog sponsored core program detail reports.]

### Digital Core Programming

7. (a)	State the average number of hours of Core Programming per week broadcast by the station on its main program stream.	0.00 hours
(b)	Did the licensee broadcast on its main digital program stream the same Children's Core Programming produced on its analog channel?	Y
(c)	If Yes to 7(b), the licensee certifies that the representations and children's program information provided with respect to its analog channel apply equally with respect to its main digital program stream.	Y
	If No to 7(c), submit as an Exhibit a Statement of explanation.	(None Required)
8. (a)	State the average number of hours per week of free over-the-air digital video programming broadcast by the station on other than its main program stream.	0.00 hours
(b)	State the average number of hours per week of Core Programming broadcast by the station on other than its main program stream. See 47 C.F.R. §73.671.	0.00 hours
9. (a)	Does the licensee provide information identifying each Core Program aired on its station, including an indication of the target child audience, to publishers of program guides as required by 47 C.F.R. §73.673?	N

(b) Identify publishers who were sent information in 9(a)

10. Complete the following for each program that you aired during the past three months that meets the definition of Core Programming. Complete chart below for each Core Program.

[There are no digital core program reports.]

11. (a) Does the Licensee certify that at least 50% of the Core Programming (counted toward meeting the additional programming guideline (applied to free video programming aired on other than the main program stream) did not consist of program episodes that had already aired within the previous seven days either on the station's main program stream or on another of the station's free digital program streams?
- (b) If No, submit us an Exhibit A Statement of Explanation setting forth the number of repeats in excess of the repeat limit and the times and dates the episodes involved were aired.

Y
(None Required)

### Non-Core Educational and Informational Programming

12. Complete the following for each program that you aired during the past three months that is specifically designed to meet the educational and informational needs of children ages 16 and under, but does not meet one or more elements of the definition of Core Programming. See 47 C.F.R. §73.671. Complete chart below for each additional such educational and information program.

[There are no digital non-core program reports.]

### Sponsored Core Programming

13. List Core Programs, if any, aired by other stations that are sponsored by the Licensee and that meet the criteria set forth in 47 C.F.R. §73.671. Also indicate whether the amount of total Core Programming broadcast by another station increased.

[There are no digital sponsored core program broadcast reports.]

[There are no digital sponsored core program detail reports.]

### Other Matters

14. Complete the following for each analog and digital program that you plan to air for the next quarter that meets the definition of Core Programming. Complete chart below for each Core Program, identifying whether it is to be broadcast on the station's analog or digital channel or both channels.

Title of Planned Core Program #1	Origin	
<b>El Desvan del Tio Ivan</b>	<b>LOCAL</b>	
Regular Schedule	Total Times to be Aired	
<b>Mondays 7:30am</b>	<b>13</b>	
Length of Program	Age of Target Audience	
	From	To
<b>30 minutes</b>	<b>5 years</b>	<b>8 years</b>
Describe the educational and informational objective of the program and how it meets the definition of Core Programming		
<b>EL DESVAN DEL TIO IVAN: Tio Ivan is a live character who shares many new adventures with his best friend, a life size puppet sheep dog. Whether at home or in the community, stories and other values are at the center of each segment</b>		
Title of Planned Core Program #2	Origin	
<b>El Desvan del Tio Ivan</b>	<b>LOCAL</b>	
Regular Schedule	Total Times to be Aired	
<b>Tuesdays and Thursdays 7:00am</b>	<b>23</b>	
Length of Program	Age of Target Audience	
	From	To
<b>30 minutes</b>	<b>5 years</b>	<b>8 years</b>
Describe the educational and informational objective of the program and how it meets the definition of Core Programming		

**EL DESVAN DEL TIO IVAN:** Tio Ivan is a live character who shares many new adventures with his best friend, a life size puppet sheep dog. Whether at home or in the community, stories and other values are at the center of each segment

Title of Planned Core Program #3		Origin	
El Cuarto de los Triques		LOCAL	
Regular Schedule		Total Times to be Aired	
Mondays, Wed, Fridays 7:00am		34	
Length of Program	Age of Target Audience		
	From	To	
30 minutes	8 years	10 years	
Describe the educational and informational objective of the program and how it meets the definition of Core Programming			
EL CUARTO DE LOS TRIQUES: Takes place in a room full of trinkets, knicks-knacks and gadgets that have a life of their own. A boy named Jorge and his best friend, a robot named Desperdicop, present scientific and cultural topics with experiments, raft, stories and other unusual activities.			

15. Does the Licensee publicize the existence and location of the station's Children's Television Programming Reports (FCC 398) as required by 47 C.F.R. §73.3526(e)(1)(ii)?

Y

16. Identify the licensee's children's programming liaison.

Name		Telephone Number	
Victor M. Franco		818-260-5752	
Address		E-mail Address	
300 W. Alameda Ave.		victor.franco@nbcuni.com	
City	State	ZIP Code	
Burbank	CA	91523	

17. Include any other comments or information you want the Commission to consider in evaluating your compliance with the Children's Television Act (or use this space for supplemental explanations). This may include information on any other non-core educational and informational programming that you aired this quarter or plan to air during the next quarter, or any existing or proposed non-broadcast efforts that will enhance the educational and informational value of such programming to children. See 47 C.F.R. §73.671, NOTES 2 and 3

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(u)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name of Licensee	Signature
NBC Telemundo License Co.	
Date	
07/11/2007	

Federal Communications Commission  
Washington, DC 20554

Approved by OMB  
3060-0754

## FCC 398 Children's Television Programming Report

Report reflects information for the filing period ending 09/30/2007 Filed on 10/05/2007

Call Sign	Channel Numbers	Community of License			
<b>KWHY</b>	22 (analog)	City	State	County	ZIP Code
	42 (digital)	<b>Los Angeles</b>	<b>CA</b>	<b>Los Angeles</b>	<b>91523</b>
Licensee Name					
<b>Telemundo Los Angeles License Corp.</b>					
Network Affiliation		Nielsen DMA		Licensee World Wide Web Home Page Address (if applicable)	
		<b>Los Angeles</b>		<b>www.canal22.com</b>	
Facility ID		Previous Call Sign (if applicable)		License Renewal Expiration Date	
<b>26231</b>				<b>2006-12-01</b>	

### Analog Core Programming

2. State the average number of hours of Core Programming per week broadcast by the station. See 47 C.F.R. §73.671(e).
- |                   |
|-------------------|
| <b>3.00 hours</b> |
|-------------------|
3. (a) Does the licensee provide information identifying each Core Program aired on its station, including an indication of the target child audience, to publishers of program guides as required by 47 C.F.R. §73.673?
- |          |
|----------|
| <b>Y</b> |
|----------|
- (b) Identify publishers who were sent information in 3(a).

AVENUE TV CABLE SERVICE AVISO DE OCASION BUENA VISTA TELEVISION CABLEVISION INDUSTRIES CHAPTER COMMUNICATION CEO CHAPTER MEDIA TRISTAR TELEVISION DISTRICT COX CABLE SAN DIEGO COX

4. Complete the following for each program that you aired during the past three months that meets the definition of Core Programming. Complete chart below for each Core Program.

Title of Analog Core Program #1		Origin	
<b>El CUARTO DE LOS TRIQUES</b>		<b>LOCAL</b>	
Regular Schedule	Total Times Aired at Regularly Scheduled Time	Number of Pre-Emptions	
<b>Mondays, Wednesdays &amp; Fridays 7:00am-7:30am</b>	<b>39</b>	<b>1</b>	
Length of Program	Age of Target Audience		E/I Symbol Used As Required
	<b>30 minutes</b>	From <b>5 years</b> To <b>8 years</b>	
Describe the educational and informational objective of the program and how it meets the definition of Core Programming.			
<b>CUARTO DE LOS TRIQUES: Cuarto de los Triques takes place in a room full of trinkets, knick-knacks and gadgets that have a life of their own. A boy named Jorge and his best friend, a robot named Desperdicop, present scientific and cultural topics with experiments, rafts, stories, and other usual activities.</b>			
Total Times Aired	Number of Preemptions for other than Breaking News	Number of Preemptions Rescheduled	
<b>40</b>	<b>1</b>	<b>1</b>	
Preemption #1			
Date Preempted/Episode #	If rescheduled, date and time reschedule	Is the rescheduled date the second home?	

July 2, 2007/Episode 1	July 3, 2007 7:00am-7:30am	N
If rescheduled, were promotional efforts made to notify the public of rescheduled date and time?		Y
Reason for Preemption <b>PUBLIC INTEREST</b>		
Title of Analog Core Program #2 <b>EI DESVAN DEL TIO IVAN</b>		Origin <b>LOCAL</b>
Regular Schedule <b>Tuesdays and Thursdays 7:00am - 7:30am</b>	Total Times Aired at Regularly Scheduled Time <b>26</b>	Number of Pre-emptions <b>1</b>
Length of Program <b>30 minutes</b>	Age of Target Audience	
	From <b>7 years</b>	To <b>12 years</b>
E/I Symbol Used As Required <b>Y</b>		
Describe the educational and informational objective of the program and how it meets the definition of Core Programming <b>TIO IVAN: Is a live character that shares many adventures with his best friend, a life size puppet sheep dog. Whether at home or in the community, stories and other values are at the center of each segment.</b>		
Total Times Aired <b>27</b>	Number of Preemptions for other than Breaking News <b>1</b>	Number of Preemptions Rescheduled <b>1</b>
Preemption #1		
Date Preempted/Episode # <b>July 2, 2007/Episode 1</b>	If rescheduled, date and time reschedule <b>July 3, 2007 7:00am-7:30am</b>	Is the rescheduled date the second home? <b>N</b>
If rescheduled, were promotional efforts made to notify the public of rescheduled date and time?		Y
Reason for Preemption <b>PUBLIC INTEREST</b>		

Title of Analog Core Program #3 <b>EI DESVAN DEL TIO IVAN</b>		Origin <b>LOCAL</b>
Regular Schedule <b>Mondays 7:30-8:00am</b>	Total Times Aired at Regularly Scheduled Time <b>13</b>	Number of Pre-emptions <b>1</b>
Length of Program <b>30 minutes</b>	Age of Target Audience	
	From <b>7 years</b>	To <b>12 years</b>
E/I Symbol Used As Required <b>Y</b>		
Describe the educational and informational objective of the program and how it meets the definition of Core Programming <b>TIO IVAN: Is a live character that shares many adventures with his best friend, a life size puppet sheep dog. Whether at home or in the community, stories and other values are at the center of each segment.</b>		
Total Times Aired <b>14</b>	Number of Preemptions for other than Breaking News <b>1</b>	Number of Preemptions Rescheduled <b>1</b>
Preemption #1		
Date Preempted/Episode # <b>July 2, 2007/Episode 1</b>	If rescheduled, date and time reschedule <b>July 3, 2007 7:30-8:30am</b>	Is the rescheduled date the second home? <b>N</b>
If rescheduled, were promotional efforts made to notify the public of rescheduled date and time?		Y
Reason for Preemption <b>PUBLIC INTEREST</b>		

### Non-Core Educational and Informational Programming

5. Complete the following for each program that you aired during the past three months that is specifically designed to meet the educational and informational needs of children ages 16 and under, but does not meet one or more elements of the definition of Core Programming. See 47 C.F.R. §73.671. Complete chart below for each additional such educational and informational program.

*[There are no analog non-core program reports.]*

### Sponsored Core Programming

6. List Core Programs, if any, aired by other analog stations that are sponsored by the Licensee and that meet the criteria set forth in 47 C.F.R. §73.671. Also indicate whether the amount of total Core Programming broadcast by another station increased.

*[There are no analog sponsored core program broadcast reports.]*

*[There are no analog sponsored core program detail reports.]*

### Digital Core Programming

7. (a) State the average number of hours of Core Programming per week broadcast by the station on its main program stream. 0.00 hours
- (b) Did the Licensee broadcast on its main digital program stream the same Children's Core Programming provided on its analog channel? Y
- (c) If Yes to 7(b), the Licensee certifies that the representations and children's program information provided with respect to its analog channel apply equally with respect to its main digital program stream. Y
- If No to 7(c), submit as an Exhibit a Statement of Explanation. (None Required)

8. (a) State the average number of hours per week of free over-the-air digital video programming broadcast by the station on other than its main program stream. 0.00 hours
- (b) State the average number of hours per week of Core Programming broadcast by the station on other than its main program stream. See 47 C.F.R. §73.671. 0.00 hours

9. (a) Does the Licensee provide information identifying each Core Program aired on its station, including an indication of the target child audience, to publishers of program guides as required by 47 C.F.R. §73.673? N
- (b) Identify publishers who were sent information in 9(a).

10. Complete the following for each program that you aired during the past three months that meets the definition of Core Programming. Complete chart below for each Core Program.

*[There are no digital core program reports.]*

11. (a) Does the Licensee certify that at least 50% of the Core Programming counted toward meeting the additional programming guideline (applied to free video programming aired on other than the main program stream) did not consist of program episodes that had already aired within the previous seven days either on the station's main program stream or on another of the station's free digital program streams? Y
- (b) If No, submit as an Exhibit a Statement of Explanation setting forth the number of repeats in excess of the repeat limit and the times and dates the episodes involved were aired. (None Required)

### Non-Core Educational and Informational Programming

12. Complete the following for each program that you aired during the past three months that is specifically designed to meet the educational and informational needs of children ages 16 and under, but does not meet one or more elements of the definition of Core Programming. See 47 C.F.R. §73.671. Complete chart below for each additional such educational and informational program.

*[There are no digital non-core program reports.]*

### Sponsored Core Programming

13. List Core Programs, if any, aired by other stations that are sponsored by the Licensee and that meet the criteria set forth in 47 C.F.R. §73.671. Also indicate whether the amount of total Core Programming broadcast by another station increased.

*[There are no digital sponsored core program broadcast reports.]*

*[There are no digital sponsored core program detail reports.]*

**Other Matters**

14. Complete the following for each analog and digital program that you plan to air for the next quarter that meets the definition of Core Programming. (Complete chart below for each Core Program, identifying whether it is to be broadcast on the station's analog or digital channel or both channels)

*[There are no planned core program reports.]*

15. Does the Licensee publicize the existence and location of the station's Children's Television Programming Reports (FCC 296) as required by 47 C.F.R. §29.3526(c)(1)(iii)?

Y
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16. Identify the licensee's children's programming liaison

Name		Telephone Number	
Victor M. Franco		818-260-5752	
Address		E-mail Address	
3000 W. Alameda Ave.		victor.franco@nbcuni.com	
City	State	ZIP Code	
Burbank	CA	91523	

17. Include any other comments or information you want the Commission to consider in evaluating your compliance with the Children's Television Act (or use this space for supplemental explanations). This may include information on any other non-core educational and informational programming that you aired this quarter or plan to air during the next quarter, or any existing or proposed non-broadcast efforts that will enhance the educational and informational value of such programming to children. See 47 C.F.R. § 73.671, NOTES 2 and 3

**WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).**

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Name of Licensee	Signature
NBC Universal	
Date	
10/04/2007	

Federal Communications Commission  
Washington, DC 20554

Approved by OMB  
3060-0754

## FCC 398 Children's Television Programming Report

Report reflects information for the filing period ending 12/31/2007 Filed on 01/04/2008

Call Sign	Channel Numbers	Community of License			
<b>KWHY</b>	22 (analog)	City	State	County	ZIP Code
	42 (digital)	Los Angeles	CA	Los Angeles	91523
Licensee Name					
Telemundo Los Angeles License Corp.					
Network Affiliation		Nielsen DMA	Licensee World Wide Web Home Page Address (if applicable)		
		Los Angeles	www.canal22.com		
Facility ID	Previous Call Sign (if applicable)		License Renewal Expiration Date		
26231			2006-12-01		

### Analog Core Programming

2. State the average number of hours of Core Programming per week broadcast by the station. See 47 C.F.R. §73.671(e).

3.00 hours

3. (a) Does the Licensee provide information identifying each Core Program aired on its station, including an indication of the target child audience, to publishers of program guides as required by 47 C.F.R. §73.673?

Y

(b) Identify publishers who were sent information in 3(a)

AVENUE TV CABLE SERVICE AVISO DE OCASION BUENA VISTA TELEVISION CABLEVISION INDUSTRIES CHAPTER COMMUNICATION CEO CHAPTER MEDIA TRISTAR TELEVISION DISTRICT COX CABLE SAN DIEGO COX

4. Complete the following for each program that you aired during the past three months that meets the definition of Core Programming. Complete chart below for each Core Program

Title of Analog Core Program #1			Origin	
El Cuarto de los Triques			LOCAL	
Regular Schedule	Total Times Aired at Regularly Scheduled Time		Number of Pre-emption	
Mondays, Wednesday & Friday 7:00-7:30	39		0	
Length of Program	Age of Target Audience		I/B Symbol Used As Required	
	From	to		
30 minutes	5 years	8 years	Y	

Describe the educational and informational objective of the program and how it meets the definition of Core Programming

Cuarto de los Triques: Takes place in a room full of trinkets, knick knacks and gadgets that have a life of their own. A boy named Jorge and his best friend, a robot named Desperdicop, present scientific and cultural topics with experiments, rafts, stories, and other usual activities.

Title of Analog Core Program #2			Origin	
El Desvan del Tio Ivan			LOCAL	
Regular Schedule	Total Times Aired at Regularly Scheduled Time		Number of Pre-emption	