

July 12, 2013

Cassie Yde, President
The Television Syndication Company
520 Sabal Drive, Suite 108
Longwood Florida 32779

Re: E/I Programming Legal Opinion

Dear Cassie:

We have acted as communications counsel to the Television Syndication Company, Inc. (“TVSCo”) with respect to matters relating to the Communications Act of 1934, as amended (“Act”), and the applicable rules, regulations and published policies of the Federal Communications Commission (“FCC”). This letter is delivered to you pursuant to TVSCo’s request related to its client-television stations inquiring about certain educational and informational (“E/I”) Core Programming requirements as defined by 47 C.F.R. §73.671. The specific issues upon which you have requested a legal opinion is whether different episodes of Core Programming aired on a digital sub-channel have a negative effect on Core Programming aired on a commercial broadcast television station’s main stream, or primary digital channel.

In rendering this information, we are engaged and acting solely as communications counsel for TVSCo, and we are not engaged, or acting as counsel of any type for you, your clients or any other person or entity.

In connection with the issuance of this letter, we have examined the Code of Federal Regulations, FCC Reports and Orders, the Children’s Television Act of 1990, as amended, and consulted with Attorney Advisors in the Policy Branch of the Video Services Division in the FCC’s Media Bureau. For purposes of this letter, we have assumed explicitly, without investigation, the authenticity of all documents examined by us, whether or not they are originals, the conformity of copies or facsimile transmissions to the originals of the same, the due authority of all natural persons with whom we have consulted.

The statements expressed herein are limited strictly to matters to our knowledge arising under E/I children’s television programming as regulated by 47 C.F.R. §73.671. We express no opinions on any other matter whatsoever.

Whenever an opinion herein with respect to the existence or the absence of facts is indicated to be “to our knowledge,” it is intended to signify that during the course of our representation of TVSCo in connection with communications matters, no information

has come to the attention of this Firm's attorneys working on this matter that would give them actual knowledge of the existence or absence of such facts. Other than our review of the correspondence provided to this Firm by TVSCo, we have not undertaken any independent investigation to determine the existence or absence of such facts and no inference as to our knowledge of the existence or absence of such facts should be drawn from our serving as communications counsel to TVSCo.

Based on the foregoing, and subject in all respects to the qualifications and limitations set forth in this letter, we are of the opinion that to our knowledge broadcasters providing more than one stream of free digital video programming may air all of their additional core programming, apart from the 3 hours of Core Programming that must be aired on the main program stream, on one free video channel, or distribute it across multiple free video channels, at their discretion. 47 C.F.R. § 73.671(e)(2)(ii). Further, at least 50 percent of the Core Programming counted toward meeting the additional programming guidelines cannot consist of identical program episodes that have already aired within the previous seven (7) days on either the station's main program stream or on another of the station's free digital program streams. 47 C.F.R. § 73.671(e)(3). Different episodes of the same television program are not held to the seven (7) day window, and may air concurrently with other episodes aired on the main program stream. *In the Matter of Children's Television Obligations of Digital Television Broadcasters*, Second Order on Reconsideration and Second Report and Order, MM Docket 00-167, FCC 06-143, ¶¶ 15-18, rel. Sep. 29, 2006. As long as the television station does not air identical episodes on the main program stream and a digital sub-channel during a seven (7) day window, the station remains in compliance with FCC rules and regulations. *Id.*

To our knowledge, there are no other judgments, decrees, or orders issued or threatened by the FCC with respect to TVSCo or any of its clients, and there are no complaints, petitions, applications, investigations, other proceedings, notices of violation, notices of apparent liability, or orders to show cause pending before the FCC with respect to TVSCo, which would reasonably be expected to have a material adverse effect upon TVSCo or its clients as these issues relate to E/I Core Programming.

This letter is solely for your information in connection with legal matter noted above, and is not to be quoted in whole or in part or otherwise referred to in any public releases, nor is it to be filed with any governmental agency or other person without the prior consent of this Firm, except as required by law or in accordance with standard accounting practice. This letter may not be relied upon for any other purpose whatsoever or by any person other than you or TVSCo. This letter addresses matters only as of the date hereof and we specifically disclaim responsibility to advise you of changes in matters addressed herein occurring after such date.

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Sincerely,

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By:

Edward S. Hammerman, Esq.
Managing Member