

**Terri M. Santisi**  
Executive Vice President

July 9, 2019



**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th St., SW  
Washington, D.C. 20554

**Re: In the Matter of Children's Television Programming Rules (MB Docket No. 18-202);  
In the Matter of Modernization of Media Regulation Initiative (MB Docket No. 17-105)**

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Dear Ms. Dortch:

This letter is to notify you that on July 9, 2019, Evan Morris, Legal Advisor for the FCC Media Bureau Office of the Bureau Chief, telephoned Terri M. Santisi, Executive Vice President for ION Media Networks, Inc. ("ION").

In response to questions posed by Mr. Morris, ION confirmed that all children's programming airing on its 70 stations nationwide is closed captioned on both the primary broadcast feed and ION's 24/7 **qubo** multicast channel. This closed captioning service is provided irrespective of the requirements of the Commission's rules as part of ION's commitment to serving the educational, informational, and entertainment needs of all children.

As one of the most dedicated commercial providers of free over-the-air children's programming in the television industry today, ION is committed to serving the public interest through the distribution of closed captioned children's programming.

This letter is being filed pursuant to the sunshine period prohibition exemption in Sections 1.1203(a)(1) and 1.1204(a)(10) of the Commission's rules, and an electronic copy of this letter is being filed in the above-referenced dockets pursuant to Section 1.1206 of the Commission's rules.

Respectfully submitted,

*Terri M. Santisi*

Terri M. Santisi  
Executive Vice President  
ION Media Networks, Inc.

cc: Evan Morris