

January 17, 2012

*Via Electronic Comment Filing System*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: In the Matter of Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations, MM Docket No. 00-168; and Standardizing Program Reporting Requirements for Broadcast Licensees, MB Docket No. 11-189

Dear Ms. Dortch:

We write to give our strong support to the Federal Communications Commission's recent proposals to expand public access to information about the programming and advertising that appears on local broadcast television stations around the country. By moving ahead with this action, the FCC will ensure that a heretofore untapped resource will aid members of the public, journalists and scholars who seek to be better informed about the programming and advertisements they see on local television. Specifically, we support the FCC's proposal that existing local television broadcast public files should be moved to an online, searchable database, and that the new disclosure include information identifying the cases when commercial advertisers pay for product placements, and information about the people and organizations that purchase political advertisements. Moreover, we support the Commission's proposals to expand and improve the information in these files by creating a statistically-valid sample of television programming that will enable individuals and researchers to obtain hard data about the range and coverage of local television programming.

The ready availability of this information will benefit both consumers and citizens—it will ensure that consumers know whether a company has paid for its airtime and citizens preparing to vote will get more information about who buys political ads. Most important, journalists will be able to look behind the advertising to help the public better understand and consider the information they receive via advertising to judge for themselves the best course of action. Currently this information is publicly available, but it is held in a file cabinet at television station offices. These physical public files are often poorly maintained, hard to find, and difficult to use. Moving them online will enable local residents as well as scholars and journalists looking for trends to quickly and easily get the information they need.

In addition to improving the accountability of television advertisers, the proposals will assist the public with holding local television broadcasters themselves accountable. Television stations continue to be relied upon by more people than any other medium, they are highly profitable, and they obtain their spectrum courtesy of the U.S. taxpayer for *free*. As part of this deal, they are required to make a small amount of information about their programming public. Knowing

about programming on a television station is particularly important for anyone trying to change opinions or increase knowledge in a community. From advocacy to assist undocumented immigrants to reducing environmental hazards, local activists often despair of the most influential local news outlet: their local TV station. Online access to information about programming choices will help public interest groups and individuals seeking to understand the information broadcast locally each day. At the same time, the local television broadcasters that offer excellent programming will have a ready-made platform to highlight their success. We strongly support the current proposals to expand and make more detailed the information available online about daily local television programming.

The Obama Administration has proclaimed its strong support of transparency in government—the more data available to members of the public, the easier it is for the public to hold both public and private institutions accountable. President Obama has directed government agencies to post as much data as possible online to facilitate an informed citizenry and more effective operations. The data maintained by broadcasters as part of their license obligations is no exception. This information is not available anywhere else. It is time broadcasters joined the 21st century and moved their public files out of the file cabinet and onto the Internet.

Sincerely,

Access Humboldt  
Alliance for Community Media  
Appalshop  
Association of Free Community Papers  
Center for Creative Voices in Media  
Center for Media & Democracy  
Children Now  
Common Cause  
Common Frequency  
Community Papers of Michigan  
Community Papers of Ohio and West  
Virginia  
Consumers Union  
Industry Ears  
Jim Haigh  
Media Action Center  
Media Literacy Project  
Mid-Atlantic Community Papers  
Association

Midwest Free Community Papers  
National Alliance for Media Arts & Culture  
National Association of Broadcast  
Employees and Technicians -  
Communications Workers of America  
National Federation of Community  
Broadcasters  
New America Foundation  
Newspaper Guild-Communications Workers  
of America  
People's Production House  
Prometheus Radio Project  
Public Citizen  
REC Networks  
Texas Community Newspaper Association  
US PIRG  
We the People Campaign  
Wisconsin Community Papers  
Wisconsin Democracy Campaign