



FEDERAL COMMUNICATIONS COMMISSION

June 14, 2012

JULIUS GENACHOWSKI
CHAIRMAN

The Honorable Mitch McConnell, Jr.
Minority Leader
United States Senate
S-221 The Capitol
Washington, D.C. 20510

Dear Senator McConnell:

Thank you for your letter expressing concern about the Commission's efforts to require television broadcasters to post their public files online – including their political files. Your letter will be included in the record for the proceeding.

Congress has mandated through the Communications Act that broadcasters have unique public interest obligations, including the public availability of a broadcast station's political file. Transparency, accessibility and equal access are essential to serving the public interest goals of the Communications Act. The question that the Commission recently addressed was whether, in the 21st century, the broadcasters' obligations to make certain files available for public inspection continued to mean tucked in their local office filing cabinets, or available online. The Commission acted to ensure that television broadcasters' public files, including the political files, be accessible not just in hard-to-access physical filing cabinets, but online.

Before adopting the online filing requirement, the Commission carefully analyzed potential costs to broadcasters. As with all paper-to-paperless conversions, the broadcasters will experience some one-time upfront costs. Based on the record, the Commission estimated these costs at an average of \$80 - \$400 per station, spread over a six month period.

This requirement not only promotes transparency and accessibility, but based on the record in this proceeding will result in long-term efficiencies and cost savings for broadcasters. Moving the file online will minimize disruptions in the daily operation of a station, and reduce the burdens placed on station staff that currently field phone calls and chaperone in-person requests to inspect files. Also, broadcasters will no longer need to maintain paper copies of eight routine items that they already file with the Commission. These items compose about a third of all items in the public file. Instead, the Commission will take responsibility for filing the material online. Even for those elements of the file still managed by the broadcasters, the online file should be less burdensome than a local file, because uploading a file will be easier and more efficient than photocopying it, walking it to the local paper file, finding the appropriate folder and inserting it in the proper order.


In order to assist smaller stations in preparing for any additional costs, the conversion to electronic files will be completed in phases. Stations affiliated with the major networks in the top 50 DMAs, roughly 200 stations out of approximately 2000 stations nationwide, must post new political

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file materials online when the rules become effective, with the rest of the industry complying by July 2014.

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in dark ink, appearing to be 'JG', with a stylized flourish extending to the right.

Julius Genachowski