

**STATEMENT OF
COMMISSIONER MICHAEL O'RIELLY**

Re: Expansion of Online Public File Obligations To Cable and Satellite TV Operators and Broadcast and Satellite Radio Licensees, MB Docket No. 14-127.

As my colleagues have highlighted, moving the required public inspection files online should benefit regulated entities and the public alike, providing better access to information while eventually reducing the cost of compliance. I have been an advocate of using the power of the Internet in many ways to make life a little easier for all parties who want to participate in Commission proceedings, and this order should ultimately help achieve that goal.

For some of our regulatees, placing all of their public files online will not only reduce costs, it will also enhance the security of their facilities, since they will no longer need to maintain a local, physically accessible public file. A few months ago, I wrote about the potential impact of this major security loophole specifically on broadcasters. Unlike cable and satellite operators, commercial broadcast licensees will not have the immediate option of transitioning to an online-only public file, due to the Commission's rule pertaining to the correspondence file that arguably cannot be made available online for privacy reasons. I very much appreciate the Chairman's attention to this important issue and commitment to move forward on a proposal to eliminate correspondence file requirements so that broadcasters, too, can have an online-only option for public file requirements. I also appreciate his willingness to address a similar security issue for cable headend locations.

Likewise, I think we need to be very careful not to expose NCE station donors to potential privacy and security risks, and asked that these donor lists be exempted from online public files. While not willing to go that far, the Chairman did allow for a waiver process, which I hope will ultimately serve as a real option to provide some protection where there is any indication it is warranted. No one should construe my willingness to allow this here to be applicable for any future situations.

I have frequently shared my concerns about the need for more rigorous cost-benefit analysis in the Commission's work, and this item raised some similar concerns. Some of my suggestions on this front were included here, but I will revisit this issue in the future.