

**STATEMENT OF
COMMISSIONER MICHAEL O'RIELLY**

Re: Noncommercial Educational Station Fundraising for Third-Party Non-Profit Organizations, MB Docket No. 12-106

Time and time again, America's *commercial* broadcasters have proven their commitment to their local communities. They are some of the best fundraisers to aid their local neighbors when tragedy strikes or when the need arises. With this modest item, we provide non-commercial educational (NCE) stations a similar opportunity to step in and provide critical assistance to vulnerable, in-need Americans without undermining NCE stations' overall purpose or function. May none of us ever be in the position of needing such assistance.

Given the potential benefits of this item, I would be receptive to loosening the limitations in some respects. Perhaps in the future, we should look to increase the permitted amount of fundraising to five percent of annual hours, or even more, from the one percent provided in the item. Moreover, I query the need to ban those NCEs with ties to the Corporation for Public Broadcasting from conducting similar fundraising, thus forcing these entities to seek a Commission waiver. With a little history and experience to guide us, we may find the item's limits too restrictive and worthy of moderation.

At the same time, I want to caution any license holder that may seek to abuse this authority. Do note, the Commission will be following the situation to ensure compliance. Of particular importance, this newly granted authority should not be seen as an opportunity for fundraising in order to line one's own pockets, especially under the pretext of conducting the Lord's work. Let's face it: it wouldn't be the first time someone tried to exploit the good name and work of religious broadcasters. Licensees not only risk fines and penalties if they do, but also risk losing their overall licenses.