

**STATEMENT OF
COMMISSIONER MICHAEL O'RIELLY**

Re: *Commission Launches Modernization of Media Regulation Initiative*, MB Docket No. 17-105

This item exemplifies the Commission's newfound openness to stakeholder input and its shift toward reality-based decision making. As has been often noted by myself and others, our regulations in the media space are strewn with anachronisms more appropriate for a different set of circumstances. A wholesale review is necessary and, indeed, long overdue. So, I support this initiative and fully expect that it will generate some quick results to follow on to our previous successes in this space, including updating the dissemination requirements for employment openings, and eliminating the main studio rule, as proposed today.

Broadcasters, cable operators, and other media stakeholders I have spoken with are familiar with my frequent calls for ideas about specific regulations that are outdated or no longer necessary. In the previous Commission, I was often able to champion these changes that were suggested to me, and get them moving in one form or another. Now that we are opening this proceeding, the entire Commission stands ready to hear your ideas and act on them, which is a refreshing change of pace. The Commission should not be in the business of generating busywork or collecting reams of data no one ever looks at.

Since the beginning of the year, I have already heard a number of ideas that I am hopeful could be implemented as part of this process, including updates of many of our reporting requirements. For example, all TV stations are required to file an Ancillary DTV Report annually regarding the 5% DTV ancillary fee. The report must be filed even if the answer, as is often the case, is simply "no fee due." This form can and should be eliminated for parties that do not owe a fee. Similarly, form 397 requires simply a name and a copy of the annual EEO reports for the last two years. But now that EEO reports are filed with the Commission in the parties' online public files, this form is duplicative.

Notification requirements are another area where many updates should be made, now that so much communication has gone digital. For example, our rules often require broadcasters to give public notice of certain applications in local newspapers. But with newspaper circulation often dwarfed by the broadcaster's own audience, or nonexistent in some localities, these notices would be much more effectively provided on a station's website. Our rules also require broadcasters to send notice of their decisions to opt into retransmission consent versus must-carry to cable operators via snail mail, a process that could be more easily accomplished online.

These and other ideas now will have an effective fast track to consideration and, if appropriate, action. I certainly will do my part to help obtain consensus and move as many as possible.