

**STATEMENT OF
COMMISSIONER JESSICA ROSENWORCEL**

Re: *Elimination of Obligation to File Broadcast Mid-Term Report (Form 397) Under Section 73.2080(f)(2)*, MB Docket No. 18-23; *Modernization of Media Regulation Initiative*, MB Docket No. 17-105

In this rulemaking we seek comment on the Broadcast Mid-Term Report, known as Form 397. It's fair to ask if this format is still necessary when so much of the information it gathers is already available in the public file.

But there is no question about what remains necessary—and that's compliance with the law. Under the Communications Act, this agency has a duty to develop rules to support a mid-term review of the employment practices of broadcast licensees. This is a responsibility we must take seriously and on that point I think the text of this rulemaking misses the mark. It focuses on the need to reduce the burdens of filers but neglects to emphasize what is most essential—the need to honor our Equal Employment Opportunity policies.

Nonetheless, I am hopeful that we can use this rulemaking to modernize reporting duties and reaffirm our commitment to increasing diversity in media. Because on that last score, we have work to do.