

**STATEMENT OF
COMMISSIONER JESSICA ROSENWORCEL**

Re: *Channel Lineup Requirements – Sections 76.1705 and 76.1700(a)(4)*, MB Docket No. 18-92; *Modernization of Media Regulation Initiative*, MB Docket No. 17-105.

“What channel is my show on?” This is a question that has been heard countless times in my house and probably in your house, too. To find the answer to this question, let’s be honest, consumers do not head to their cable operator’s local office. Nor do they search their provider’s online public inspection file at the Federal Communications Commission to peruse the channel lineup. That’s because today consumers can get this information a whole lot faster and a whole lot easier through a website or an operator’s on-screen electronic or paper program guides.

This decision brings our rules fully in line with how consumers search for stations. So the elimination of these dated requirements has my support. But I want to point out that we have more work to do if we want to truly modernize the public file system that is the subject of our decision today.

Let me explain.

For decades, the FCC has required that broadcast stations keep a public file with information about the station’s operation and service to the community. These filings include things like station authorizations, contour maps, ownership reports, equal employment opportunity filings, reports on children’s television programming, materials related to investigations and complaints, and joint sales agreements. They also include a political file that features sponsorship information concerning political advertisements paid for by candidates, groups, and individuals; details on when they run; and what issues of national importance they discuss. Over time, the requirement to keep the public file was extended to others, including cable systems and direct broadcast satellite providers.

In 2012, the FCC decided it was time to begin uploading the contents of these public inspection files online. With this decision, the agency brought a new level of transparency to government. It moved documents from dusty file cabinets—the kind covered with cobwebs—to an online public portal. And slowly but surely, the agency expanded this portal to cover the range of different entities subject to public file obligations.

As a result, today, there are thousands and thousands of entities that post their public file online at the FCC.

So far, so good. But now the hard truth: this system is dated. These filings are not machine-readable. They cannot be processed by a computer. That means they are stuck in analog age format. They are not built for the era we live in now—where data is all. That means journalists, researchers, advocates, and the public at large do not have the ability to download, sort, aggregate, search our files in a meaningful way. That means it is all but impossible to use this system to study trends in everything from media ownership to political advertising. In fact, researchers have called our data “pretty useless,” and “effectively unusable.”

This matters. To understand why, consider that more than 3.3 million records were filed by broadcasters alone on the online political file in the last two years. That breaks down to more than 4,600 records filed per day. At a time when billions are spent on television advertising each election cycle, our online political file could be an invaluable tool for the public to know who is sponsoring candidates and trying to influence our elections. But right now, our data is so difficult to navigate, this is not possible.

I think we can do better. The Internal Revenue Service provides machine-readable data for non-profit organizations and allows for bulk downloads. The Federal Election Commission has standardized

forms with machine-readable data and archives that make it possible to track trends over time. In other words, agencies across Washington have updated their online platforms. They offer machine-readable data—and in the process support transparency in elections. We should learn from their example. We should update the public file system for the digital age. It should be searchable, sortable, and downloadable. It should be transparent and useful for the public. So in our media modernization initiative, let me offer my colleagues a suggestion: if we truly want to be modern, working on a machine-readable format for the public file should come next.