

**STATEMENT OF
COMMISSIONER MIGNON L. CLYBURN**

Re: Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations and Extension of the Filing Requirement for Children's Television Programming Report (FCC Form 398), MB Docket Nos. 00-168 and 00-44

Disclosure and transparency: Words that inspire confidence, increase the public's trust, and convey good faith. We're seeing, hearing and focusing more and more each day, on ways to enhance these efforts in both our public and private sector engagement. So it greatly pleases me today, to join my colleagues in taking a meaningful leap to this end, when it comes to the media landscape.

Local television stations play a vital role in American communities. They provide us with daily updates on weather and traffic patterns, conduct in-depth reports about area officials and businesses, and expose us to rare views and personalities in our neighborhoods when we are often too busy to notice. While I wasn't personally involved in local TV reporting, the small newspaper that I owned and operated offered unique insights and reporting that had value worthy of protection.

Under current obligations that apply to commercial broadcast television stations, the program logs and files of any particular station can be accessed and inspected by the public.

Those files serve to assist not only media academics and scholars who assess the trends in local reporting and programming, but they also act as a verifiable means to hold stations accountable for their public interest obligations. If a broadcaster asserts that a certain show is educational, informational, and relevant to the community, these files serve as a means for others to evaluate that contention. Further, when a broadcast license comes up for renewal, community residents can examine the public file to determine if objections should be raised based on what they may conclude are the lack of cogent and frequent local reporting and community-based content. A community's desire to examine public files is only possible, if they have realistic, meaningful access.

I've seen such files. They reside deep within a broadcast station's inner-labyrinth, far from the reception area, in a vintage filing cabinet with letters marked only in small font. I make light of this, to stress a point. Now is the time to move these "PUBLIC" files out of cabinets and onto the web.

The public should have unfettered access to documents and records that affect them intimately, and I believe that local news does just that. Today, 74% of Americans turn to broadcast TV more frequently than any other source for local news, while 78% of Americans are online on a regular or semi-regular basis. That statistical overlap is striking.

Physically going to a station and sifting through documents is time-consuming, travel-intensive, and difficult. Creating a meaningful way for the public to view these files with an online engagement is, to quote a popular commercial, “priceless”.

Despite these benefits, I am cognizant of the burdens that come with transitioning to web-based filing would result. To quote Steve Waldman’s report on the Information Needs of Communities, “A transition to a digital system needs to be handled carefully and in a manner sensitive to the capacities of different broadcasters.” Our item, therefore, asks probing and constructive questions in that regard, and I look forward to input and suggestions as we move toward full implementation.

In a separate but related proceeding, we will address the amount of programming content that should be contained in the online disclosure process. I certainly would like to see as much detail as possible. As I mentioned, I have seen the paper versions of these public files, and they leave much to be desired. And while I am an advocate for a streamlined process, submitting a flimsy description for an important story is neither okay, nor should be permitted. Thus, the submissions should have to meet a certain threshold, and I’m certain that broadcasters will be partners with me and my colleagues in that regard.

I have spoken to the Chairman, and I appreciate his assurances that we will move expeditiously on both the consideration and enactment of that item and the next steps for this one.

The Commission, I know is committed to devoting the necessary resources toward the construction of a host forum for these files and will get this up and running in a timely manner. With the inclusion of documents found in the FCC Consolidated Database System, the diligence of the able people behind our agency’s website operations, and the related item concerning future form’s layout and content, I am confident that we will develop a mechanism for a robust and thorough process.

And no matter what shape or form this offering takes, it must be accessible to those with sight and hearing impairments. We have made significant progress under the Communications and Video Accessibility Act, and this is another way where our agency can continue to lead by example.

I wish to thank all of the hard-working individuals behind this item, particularly Holly Saurer, and I look forward to the next iteration of this extremely important proceeding.