

**STATEMENT OF
COMMISSIONER AJIT PAI**

Re: *Revisions to Public Inspection File Requirements – Broadcaster Correspondence File and Cable Principal Headend Location*, MB Docket No. 16-161.

The late singer and actress Pearl Bailey once famously said: “What the world really needs is more love and less paperwork.” The FCC can’t do much about the former, but today, it does something about the latter.

In particular, this *Notice of Proposed Rulemaking* raises the question of whether the FCC should continue to require commercial broadcast stations to maintain letters and emails from the public in a paper inspection file. In my view, our correspondence file mandate is an unnecessary regulatory burden. Indeed, the very words “hardcopy,” “paper,” and “inspection file” are enough to make an increasingly digital citizenry yawn. I therefore support the proposal to eliminate this mandate.

There is little, if any, connection between the requirement and its purported goal of ensuring that a station serves its local community. Without the requirement, viewers and listeners would still be able to tell any broadcaster and the FCC what they think about a station’s performance. Moreover, getting rid of this requirement would allow commercial broadcasters to exclusively use an online public file rather than maintaining both physical and digital files.

I also support the proposal to eliminate the requirement that cable operators disclose headend location information in their public inspection files. When the Commission was considering cable operators’ online file obligations, I appreciated my colleagues’ willingness to refrain from ordering cable operators to post the location of their systems’ principal headends on the Internet. Widely disseminating that information, in my view, would have heightened security threats without any corresponding benefit to the public.

But cable operators are *still* required to place headend location information in a paper inspection file. This mandate is entirely unnecessary. For what was true for digital is true for analog: There is no legitimate need for the public to know the location of a cable system’s principal headend. Indeed, making the location of such critical infrastructure available to the general public could increase the security risks facing those facilities. And, once again, repealing this rule would allow cable operators to transition fully to an online public file and stop storing all that paper.

Too often of late, the FCC has imposed unnecessary regulatory burdens that don’t benefit consumers. But here, we are showing more love toward the public interest and proposing to eliminate two such burdens. That’s why I support this *Notice* and a prompt resolution of this proceeding.