

**STATEMENT OF  
COMMISSIONER MICHAEL P. O'RIELLY**

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

I fully support this step forward to eliminate unnecessary Commission requirements, thereby reducing costs for broadcasters and cable operators and enhancing overall physical security at their facilities. As I have pointed out in the past, the need to maintain the required correspondence files on paper and make them available to anyone walking in from the street creates an unnecessary security exposure for broadcasters. Likewise, including in cable public inspection files the location and designation of cable principal headends constitutes a potential security risk not only to cable operators' physical office space and employees, but also to the headends themselves.

The Commission's move to online public files presents us with an opportunity to review these particular risks. If the public inspection file is placed online, there is no more need to provide public access to a physical paper copy. However, a few roadblocks still remain before broadcasters and cable operators can transition to an online-only public file. The public file rules require broadcasters and cable operators to include a small amount of very specific information that arguably should not be placed online – namely public correspondence that includes its senders' personally identifiable information – as well as the locations and designations of cable headends. So despite undertaking the burden to move vast quantities of public file information onto the Internet, many filers still would not be able to realize the security-related benefits of having a truly online public file.

To the staff's credit, when I brought this issue to their attention, they were willing to set aside assumptions and question whether this information should be kept in a public file at all. Given the very few requests for onsite inspection of broadcasters' correspondence files or cable companies' headend information, along with modern options, like email and other social media, these rules look outdated and unnecessary.

This is an excellent case of a half dozen or dozen changes that should be made to update our media rules. I thank the staff for all their good work in this regard. I look forward to reviewing the comments that will be filed, and hopefully clearing away the roadblocks in the very near future.