

**STATEMENT OF
COMMISSIONER MICHAEL O'RIELLY**

Re: *Elimination of Main Studio Rule*, MB Docket No. 17-106.

With this item, the Commission eliminates an unnecessary requirement that has long outlived its usefulness. The main studio rule, adopted in 1939, restricts broadcasters from allocating their resources efficiently and could even discourage them from launching stations in rural areas. This is a clear example of a Commission rule where the costs outweigh any perceived benefit and I am pleased that we are bringing this proceeding to a decisive conclusion.

When it was implemented—nearly 80 years ago—this rule may have made sense. There was no Internet, social media, or even wireless phones, tools that we now rely on to connect quicker, easier, and more frequently with one another. Today, as the item recognizes, it is more efficient and effective to call or email a broadcast station, especially in times of an emergency, rather than visit the actual studio. By eliminating the requirement that a broadcast station must retain a physical location with a de facto requirement to have two designated staff members but retaining the obligation that broadcasters maintain a contact number, the Commission ensures that community members will be able to reach their local broadcaster in a way that reflects how the public currently communicates with local businesses.

Importantly, this item eliminates costly burdens that no longer make sense in today's modern world. It does *not* eliminate localism, especially in smaller markets. The obligation to air programming responsive to the interests of the community and requirement to maintain in a broadcast station's public inspection file the quarterly issues program lists detailing the programs aired that "provided the station's most significant treatment of community issues"¹ remain intact. There has been no causal effect much less any correlation shown between the maintenance of this rule and the quality of programming or the amount of local content.

Moreover, market incentives and license obligations will ensure that broadcasters remain focused on serving the needs of their local listeners and viewers. Broadcasters noted in the record that "a significant number of broadcasters would continue to provide local program origination as a matter of prudent business operations, in order to serve their communities and receive the economic support of same through advertising sales."² In fact, removing this burden could actually pave the way for even more local content, especially in rural communities. While before a station may decide not to locate in an area because it could not support the requirements embedded in the main studio rule, today, the decision could be to expand rural coverage. I look forward to seeing how the market will evolve once the Commission removes an obsolete burden.

Again, I thank the Chairman for focusing on this proposal, and I fully support this item.

¹ 47 CFR 73.3526.

² AMG Comments at 3.