

**STATEMENT OF  
COMMISSIONER MIGNON L. CLYBURN**

*Re: Amendment of Section 73.624(g) of the Commission's Rules Regarding Submission of FCC Form 2100, Schedule G, Used to Report TV Stations' Ancillary or Supplementary Services, Amendment of Section 73.3580 of the Commission's Rules Regarding Public Notice of the Filing of Broadcast Applications, MB Docket No. 17-264; Modernization of Media Regulation Initiative, MB Docket No. 17-105; Revision of the Public Notice Requirements of Section 73.3580, MB Docket No. 05-6.*

Today we are faced with a simple question: Do we proceed down a path, to eliminate or relax a broadcaster's responsibility, to notify the public when it files various license applications? My answer is likewise a simple one: Doing so is a horrible idea, with no discernable benefit to consumers.

So, one might ask: Why am I taking such a strong stand, about making the public aware over multiple platforms, of information that some may view as trivial? For one thing, how can this Commission claim, that it is able to determine whether a station is operating in the "public interest, convenience and necessity," without key input from the viewing public? Permitting notification or quote, unquote, referring "the public to an Internet website that contains the text of such announcements", would signal to the American people that when it comes to a broadcaster's license application, it is simply "move along, nothing to see here" or it is okay to keep the digitally unconnected in the dark.

Quite honestly, the very notion that the public's first instinct is to check a station's website to find out if they have filed a license application is absurd. Even more ridiculous, is the suggestion that members of the public can "sign[] up to receive Commission-generated RSS feeds" to alert them of such a filing. These alternatives sound like Washington-geek-speak and is another example why government officials are repeatedly accused of being out of touch with mainstream America.

It seems sometimes this Commission forgets that these are the public airwaves and that comes with a series of obligations on broadcasters, including to serve and be responsive to the local needs and interests of their community. It is already disheartening, that the Commission does not have a more robust license renewal process in the first place, to ensure that a station is truly meeting its obligations to the community. Making it more difficult for viewers to know when their local station's license is up for renewal or is even changing hands to a new station owner, is a disservice to the viewing public.

We need greater transparency, not less, among those given the responsibility to utilize the public airwaves. While I initially approached this NPRM ready to dissent, I am grateful to Commissioner O'Rielly for hearing my concerns and working with my office to address the tone of the item and the need to ask whether there is a comparable means to notify the public, if not done through on-air announcements.

And although I continue to believe this NPRM is just another example of a deregulatory fishing expedition with less than transparent bait on the line, because of the tonal changes made, I will vote to approve in part and concur in part, so that a robust record can be built. My thanks to the Media Bureau staff for your work on this item.