

**STATEMENT OF
COMMISSIONER MICHAEL O'RIELLY**

Re: *Sinclair Broadcast Group, Inc.*, File No. EB-IHD-16-00021748.

While I generally don't comment on the Commission's issuance of a Notice of Apparent Liability done via circulation, it seems appropriate and necessary to do so in this instance.

With this item, the Commission proposes a forfeiture of more than \$13 million for a violation of our sponsorship identification rules—the largest penalty the Commission has proposed for such a violation. This figure was calculated by taking the base forfeiture amount for each apparent violation, and then *upwardly* adjusting it. At this point in the process, this seems like stern but fitting action, as the Commission considered several factors and determined that they did not warrant downward adjustment, including the fact that it appears that the failure to disclose this information was unintentional, the content in question involved a cancer institute, some incomplete disclosures were provided, and Sinclair took corrective measures, including publicly acknowledging and apologizing for its failure to provide sponsorship identification through a five-week series of announcements in October 2016.

Our action is consistent with how the Commission has assessed forfeitures for sponsorship identification violations in the past: by multiplying the base forfeiture by the number of violations and then adjusting the fine upward or downward based on the unique facts of the case. In fact, this is precisely what the previous Commission did under similar circumstances.

I look forward to reading any response from the affected party and reaching a conclusion in this enforcement matter.