

**STATEMENT OF  
COMMISSIONER MIGNON L. CLYBURN**

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

For years, you have heard me speak about the unique role broadcasters play in local communities. NAB President and CEO Gordon Smith reinforced this view in his 2014 Congressional testimony by stating that “Localism underpins each of our FCC licenses . . . Our stations demonstrate their commitment to this promise in times of every emergency, reminding us of broadcasters’ important role as first informers.”

So I find it perplexing that those very same broadcasters are advocating to absolve themselves from maintaining local roots in their community of license. A broadcaster’s main studio is often the only physical tie to a community. Broadcasters are often among the first to report an emergency, and when it comes to radio, that physical presence means they actually know and are experiencing first hand, what their local listeners want and need to hear. By tentatively proposing to eliminate the Commission’s main studio rule however, it seems to me that we are embracing a world in which automated national programming is the new normal. When the community wants to know what is going on in their backyard, my question is, will simulcasting fill the gap?

Now I understand the economic challenges facing many stations, particularly in small and mid-sized markets. And if elimination of the main studio rule is what gives that small market station with just five employees, the chance to keep the lights on and continue producing local programming, then I am empathetic. But we need to think long and hard about the practical implications of eliminating this rule altogether.

While it is true, that with the public file now accessible online, members of the public have one less reason to visit a station’s main studio. And yes, a local or toll-free telephone number is a good thing, but if nobody is there to answer that call, and the only option is to leave a voicemail, how often will it be checked, when will that call be returned, and who is going to report if, heaven forbid, there is, say, a train derailment and hazardous chemicals are spilled, jeopardizing the safety of the surrounding community? This was indeed the case in 2002, during the Minot train derailment, when it took several hours to locate station managers.

I thank Chairman Pai for hearing my concerns, and including a series of questions focused on whether eliminating the main studio rule will impact a station’s ability to communicate time-sensitive or emergency information to the public. The NPRM also asks at my request, whether a station’s phone number should be staffed during the hours in which that station is on the air. This would provide a means for the public and local officials to communicate life-saving information during an emergency. I am also grateful for the inclusion of questions on what impact elimination of this rule would have on LPFM and non-commercial stations.

So while I admit that I remain skeptical about moving forward with an outright elimination of this rule, I believe that the NPRM tees up the appropriate questions needed to build a fulsome record. For these reasons, I will vote to approve today’s NPRM.

My thanks once again go to the staff of the Media Bureau for working with me to ensure that broadcasters remain a core part, of every local community in this country.