

**STATEMENT OF  
COMMISSIONER BRENDAN CARR**

Re: *Elimination of Obligation to File Broadcast Mid-Term Report (Form 397) Under Section 73.2080(f)(2)*, MB Docket No. 18-23; *Modernization of Media Regulation Initiative*, MB Docket No. 17-105

On March 1st, the Commission will complete the transition to online public files for all broadcasters subject to public file requirements. So by next week, every one of these public files will be available in a central database hosted by the FCC. Given the ease with which the Commission can access these files, there is no longer any reason to continue requiring broadcasters to file redundant paperwork. In fact, I heard from one broadcaster earlier this week when I visited their station in Mississippi about the still significant paperwork burdens the FCC imposes on local broadcasters, and how it diverts limited resources away from other efforts.

The FCC's Form 397 is a case in point. In the past, this form was used to facilitate a mid-term review of a station's employment practices to ensure compliance with federal Equal Employment Opportunity rules. But now, all of the compliance information will be available in broadcasters' online public files, so Form 397 is largely duplicative.

The one piece of information in Form 397 that is not duplicated in the public file is the number of full-time employees a station maintains, which determines whether it is subject to EEO rules. So we rightly seek comment on ways that the Commission can continue to identify stations subject to those EEO rules. The record that has been developed so far indicates that we can continue to carry out our important obligations under the EEO laws while reducing the costs of filing requirements. So I look forward to reviewing the comments that all stakeholders provide in response to this Notice of Proposed Rulemaking.

I thank the Media Bureau for its work on this item. It has my support.