

**STATEMENT OF
COMMISSIONER MICHAEL O'RIELLY**

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)

The form we send to the trash heap today, which requires our nation's broadcasters to file equal employment opportunity (EEO) information for a mid-term review, was one of the first that I targeted for elimination when the Commission started its media modernization proceeding. Currently, broadcasters provide an EEO contact person and their two most recent annual EEO reports, all of which is already available online. Information on whether a station meets the criteria to trigger a mid-term review is not submitted elsewhere, however, so today's item sets up a requisite process as part of the online public inspection file. Therefore, all the information needed for the Commission to conduct a mid-term review of broadcasters' employment practices, which will continue, will be conveniently located in the online public file, making the Form 397 filing completely redundant. I did notice that we have committed to a future NPRM to examine, audit, and consider ways to improve our EEO enforcement. I am hopeful, but I do not necessarily expect that any ideas will not violate the U.S. Constitution, Supreme Court precedent, or the law.

I thank the Chairman and staff for bringing this review to an expeditious conclusion, continuing to modernize our media rules, and putting an end to this unnecessary and burdensome reporting requirement. I approve.