

**STATEMENT OF
CHAIRMAN AJIT PAI**

Re: *Electronic Delivery of Notices to Broadcast Stations, Modernization of Media Regulation Initiative*, MB Docket Nos. 19-165 and 17-105, Notice of Proposed Rulemaking

Electronic Delivery of MVPD Communications, Modernization of Media Regulation Initiative, MB Docket Nos. 17-317 and 17-105, Report and Order and Further Notice of Proposed Rulemaking

The term “death by a thousand cuts” derives from *Lingchi*, an ancient form of Chinese torture and execution, in which a person was slowly and repeatedly cut until death. But it has become a figure of speech that is relevant to the modern regulatory state. Each individual rule imposed by government might not be oppressively burdensome when considered in isolation, but taken together, the regulatory impact can be substantial, if not fatal.

That is in part why the FCC has undertaken our initiative to modernize our media regulations. In today’s iteration, we address figurative cuts that can produce literal paper cuts: our outdated requirements for paper notifications that broadcasters and multichannel video programming distributors—MVPDs—must send each other.

In our first item, we modernize our rules by requiring broadcasters to only send MVPDs carriage election notices when changing their prior status, and even then to convey them by e-mail instead of on paper. In our second, we propose to modernize our notification rules by requiring cable and satellite providers to send notices to broadcast television stations via e-mail instead of by paper mail. These arcane requirements aren’t without cost. For example, the current carriage election notification rules mandate that a broadcast station send paper letters to every single cable system in its market every three years. The National Association of Broadcasters estimated that station groups are spending more than \$1,000 per station, per carriage election cycle, on these mundane notifications.

I’m particularly pleased that our carriage election *Report and Order* reflects a compromise proposal that almost every commenter supported. I hope that our proposal to update our MVPD notice rules will be similarly received.

Today’s actions will cut red tape, save trees, and bring our notice requirements more in line with current business practices. They also reflect our finding in an earlier *Report and Order* in the *Modernization of Media Regulation Initiative* that consumers and businesses increasingly prefer and rely on electronic notifications over paper ones.

My gratitude to the many Commission staffers working to modernize our media rules. I’d like to thank Michelle Carey, Chris Clark, Lyle Elder, Martha Heller, Brendan Holland, Varsha Mangal, and Sarah Whitesell from the Media Bureau, as well as Susan Aaron, David Konczal, Bill Richardson, and Royce Sherlock from the Office of General Counsel. They are steadily ensuring that any incisions our rules require are necessary and (hence) fewer—no small feat.