

**STATEMENT OF
COMMISSIONER MICHAEL O'RIELLY**

Re: *Amendment of Section 73.3580 of the Commission's Rules Regarding Public Notice of the Filing of Applications*, MB Docket No. 17-264; *Modernization of Media Regulation Initiative*, MB Docket No. 17-105; *Revision of the Public Notice Requirements of Section 73.3580*, MB Docket No. 05-6.

At the risk of sounding like a broken record, I genuinely believe we have reached an urgent moment in our media modernization efforts. Those of us who study the marketplace analyses and listen to feedback from industry leaders about how they run their businesses continue to receive a common message: the FCC needs to eliminate or modify any and all unnecessary government burdens so traditional broadcasters can fully compete against their completely unregulated rivals who are taking a larger share of scarce advertising revenues within the markets served. Refusal to provide even a modest amount of breathing room risks suffocating the regulated industry.

As for the item before us today, I remain strongly supportive of the merits of removing the newspaper publication requirement and other reforms and seek to move the item to final order expeditiously. In terms of specifics, I have always considered it constitutionally suspect to require stations to conform their speech to a government-mandated formula and continue to have reservations over adopting script text within our rules. However, if our goal is to modernize existing disclosure requirements, at least the bright line rules we propose today may ease compliance. The broadcasting community finds these proposed scripts to be much, much better than existing ones and is grateful for the Media Bureau's significant efforts to eliminate grossly outdated rules and truly streamline those that remain. For example, my understanding is that, in test runs by stations, the scripts happen to track a 30 second spot, a standard format for broadcast programming. I appreciate this attention to an important goal: conforming regulations to a format that makes sense in the real world.

This leads me to my last point. Any proposal submitted in the comment process supporting burdensome information disclosures, additional script language, or litigation traps for stations in the form of compliance burdens will find me in opposition, and I would hope that such efforts do not make it into the final Order. With that, I once again thank the Chairman for bringing forward modernization items every month, and I look forward to continuing to work with him on further ideas in the future.