

**STATEMENT OF
COMMISSIONER MICHAEL O'RIELLY**

Re: *Cable Service Change Notifications*, MB Docket No. 19-347; *Modernization of Media Regulation Initiative*, MB Docket No. 17-105; *Amendment of the Commission's Rules Related to Retransmission Consent*, MB Docket No. 10-71.

In late January, I published a blog regarding additional media modernization ideas that the Commission should consider, including dispensing with certain recordkeeping rules related to cable operator interests. At the time, we were blissfully ignorant of the kinds of transformative events that our country would experience over the last six to seven months. Despite many challenges, the work of the Commission has continued throughout this period, and I commend the Chairman for continuing to push forward many reforms, while handling the myriad of issues that have arisen due to the COVID-19 pandemic, including rule changes to enable needed emergency programming. I hope we will consider adding to the list of needed reforms and expediting their adoption.

When it comes to modernizing cable service change notifications, the item before us modifies these rules by balancing the need to inform consumers about certain changes with the burden imposed on providers, and, in turn, their customers, who ultimately bear these costs. The updated rules will have a measurable, and positive, effect in reducing the amount of resources that operators must put into certain notices and disclosures, many of which are left over from a bygone era and contain information that may be easily found on the Internet. It is also important that some changes, such as the elimination of certain annual notices, rightfully shifts the burden to the regulator to prove why a regulation must remain on the books, rather than require regulated entities to constantly justify why outdated rules should be scrapped.

The most substantial fix in the item alters when consumers must be notified of certain channel and programming changes. Over time, the existing FCC mandate has mistakenly been wrapped into certain retransmission consent disputes, and this item provides an evenhanded remedy. Specifically, we alleviate the obligation that any change notice be issued 30 days in advance, taking into account that some retransmission consent negotiations have been known to go down to the wire with respect to their contractual deadlines. To be clear, the retransmission consent process is not being changed in any way by this item, and cable operators will still be required to provide these notices as soon as possible.

In the vein of reducing unnecessary requirements, we also voted, in a separate item that was removed from today's agenda, to dispense with a recordkeeping rule for attributable interests that inexplicably outlasted its underlying mandate, which was struck down by the courts nearly two decades ago. I thank my colleagues for their unanimous support for my efforts to advance and now finalize that item as well.

I approve.