

**STATEMENT OF  
COMMISSIONER JESSICA ROSENWORCEL**

Re: *Electronic Delivery of Notices to Broadcast Stations*, MB Docket No. 19-165; *Modernization of Media Regulation Initiative*, MB Docket No. 17-105.

More than two years ago, the Federal Communications Commission began a series of proceedings to modernize our media policies. Since that time, this agency has issued more than thirty rulemakings and orders to update our practices governing everything from paper copies to posting notices at stations. Today, we continue this streak with a decision to allow cable and satellite providers to send certain information electronically to broadcasters. This is a thoughtful update. It has my support.

However, in each of these efforts to modernize media at the agency we make choices. Choices have consequences. And I think history will reflect that not all of our choices have been good ones.

One of the very first media modernization projects taken up by the FCC was the elimination of the Main Studio Rule. This rule required that stations maintain a physical presence in the community they serve. It has a long history in broadcasting but under the guise of saving radio, this agency—over my objection—gutted the Main Studio Rule. My colleagues said this would save costs and keep stations on air. Here's what it really did: Two weeks ago the largest radio company laid off hundreds of on-air hosts in small and medium-sized markets across the country. That's because they had the green light from this agency to cut employees, shutter operations, and pipe in content from far away but still claim the station is local.

Again, we have choices to make when it comes to media modernization. Sometimes it's the choices we fail to make. Because while we've been cutting paperwork and rolling back rules, we have been ignoring the modernization that most needs our attention right now.

For decades, the FCC has required that broadcasters, cable systems, and direct broadcast satellite providers keep public inspection files that include information about station operations. This online system also includes a political file so that every station logs information about who paid for political advertisements, when they ran, and what issues of national importance they discuss.

So now, in an election year, if you want to find out who is spending money on political advertisements on your radio or television, you would think the modern thing to do would be to search those public files. But you'd be wrong. They are not machine readable. They cannot be processed by a computer. So here we are in the digital age and our files are stuck in analog era format. The failure to make these files machine readable and improve transparency in an election year is also a choice—and I believe it is the wrong one.