

**MB Docket No. 07-294**  
**“FCC Proposed Promoting Diversification of**  
**Ownership in the Broadcasting Services”**

**MB Docket No. 10-234**  
**Amendment of Part 1 of the Commission’s Rules, Concerning Practice and**  
**Procedure, Amendment of CORES Registration System**

The following comments are the University Station Alliance’s (USA’s) reactions to ***FCC Proposed Promoting Diversification of Ownership in the Broadcasting Services (MB Docket No. 07-294) and Amendment of Part 1 of the Commission’s Rules, Concerning Practice and Procedure, Amendment of CORES Registration System (MD Docket No. 10-234)***. The USA headquartered at 1017 W Brooke Hollow Ct, Stillwater, OK, Executive Director Craig Beeby, is a grassroots non-profit 501 (c)(3) representing noncommercial public radio stations licensed to universities, colleges, school systems, and state agencies. Over two hundred (200) of these across the country are served by or actively involved with the USA.

The USA is opposed to the proposed change. The USA supports the Commission’s efforts to broaden the diversity of broadcast ownership, but requiring NCE station licensee board members to register with the Commission based on the individual’s SSN will discourage participation in NCE station governance. The USA supports the joint comments submitted to the Commission by National Public Radio, the Public Broadcasting Service, the Association of Public Television Stations, and the Corporation for Public Broadcasting. The USA also supports the joint comments submitted to the Commission by the Public Radio Regional Organizations (PRROs) including Eastern Region Public Media (ERPM), California Public Radio (CPR), Public Radio in Mid-America (PRIMA) and Western States Public Radio (WSPR).

It is important that the FCC not make the change for NCE stations. This proposal would not benefit the Commission’s ownership analysis and would have a

significant negative impact on broadcast stations licensed to universities, colleges, school systems, and state agencies (generically called universities). Requiring the submission of SSNs for public radio stations licensed to universities would not produce information useful to the Commission's efforts for the following reasons:

- The nature of ownership and governance in the context of public radio stations licensed to universities is fundamentally different from commercial broadcast stations.
- As noncommercial educational stations, university licensees are not owned by any individual or corporation. Their licenses are owned by universities themselves.
- Trustees/board members are unpaid and have no financial interest in the station itself.
- Station governing boards are often comprised of the Trustees of the university holding the broadcast license.
- In this capacity, Trustees' governance and oversight roles go well beyond the scope of the individual station, encompassing the affairs of the entire academic/research/education institution. Therefore, not only would information gathered on these individuals simply not be useful in measuring ownership, including it with ownership information gathered from commercial broadcasters could present an inaccurate picture of broadcast ownership.

Requiring the submission of SSNs or even a portion of the SSNs would impose an administrative hardship on stations and would ultimately discourage station board participation for the following reasons:

- University trustees are for the most part either elected or serve as political appointees. For instance in the States of Oklahoma and New Mexico, the university governing boards are appointed by the Governor of each respective state.
- As such, university-licensed stations, like other public radio stations, simply cannot compel Board members to provide their SSNs, and attempting to do so would present significant administrative challenges.

- In addition, requiring the disclosure of this type of personal sensitive information may even discourage participation by prospective board members. University trustees are often influential individuals, who are valued for their expertise and extensive networks.

We urge the FCC to reject this proposed change. Most stations owned by universities, colleges, state agencies, and school districts know the negative unintended consequences that will result if the rule is changed.

**Recommended by the USA Board of Directors March 27, 2015**

<b>President</b> <b>John Hess</b> Boise State Radio Boise State University Boise, ID	<b>Vice President</b> <b>Kerry Swanson</b> Northwest Public Radio Washington State University Pullman, WA	<b>Secretary</b> <b>Tom Hunt</b> WCBU Bradley University Peoria, IL
<b>Treasurer</b> <b>Chuck Singleton</b> WFUV Fordham University Bronx, NY	<b>Member</b> <b>Ed Subkis</b> KHSU Humboldt State University Arcata, CA	<b>Member</b> <b>Caryn Mathes</b> KUOW Puget Sound Public Radio Seattle, WA
<b>Member</b> <b>Ernie Sanchez</b> Founder Sanchez Law Firm Washington, D.C.	<b>Member</b> <b>Staci Hoste</b> WNIU Northern Illinois University DeKalb, IL	<b>Member</b> <b>Connie Walker</b> WUNC University of North Carolina at Chapel Hill Chapel Hill, NC
<b>Executive Director</b> <b>Craig Beeby</b> University Station Alliance (USA) Stillwater, OK		