

**STATEMENT OF
COMMISSIONER JESSICA ROSENWORCEL**

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 Federal Communications Commission has issued more than two dozen rulemakings and orders in a two-year long effort to modernize our media policies. Today we continue that work with two more rulemakings and one additional order, all focused on how we adopt updated notification systems that apply to a mix of broadcasting, cable, and satellite interests. This is a positive development and it has my support.

But I don't think it is right for this agency to keep plowing ahead with our media modernization initiative without acknowledging we have done nothing to update the least modern aspect of our media policies—and that's the public file system.

For decades, the FCC has required that broadcast stations keep a public file with information about the station's operation and service to the community. These filings include station authorizations, contour maps, and materials related to investigations, as well as joint sales agreements. They also include a political file that features sponsorship information concerning political advertisements paid for by candidates, groups, and individuals. Over time, this requirement to keep a public file was extended to others, including cable systems and satellite providers.

A little less than a decade ago, the FCC decided it was time to begin uploading the contents of these public inspection files online. In other words, these files, which had been kept in dusty cabinets, finally were posted on an online portal. This was good—for starters. But now this system is dated. These filings are not machine readable. They cannot be processed by a computer. They are not built for the era we live in now—where data is all. That means journalists, researchers, advocates, and the public do not have the ability to download, sort, aggregate, or search our files in any effective way. That means it is all but impossible to use this FCC system to study trends in everything from media ownership to political advertising.

We should update the public file system for the digital age. It should be searchable, sortable, and downloadable. It should be transparent and useful for the public. So if we want to be truly modern in our media modernization initiative, working on a machine-readable format for the public file needs to come next.