

**STATEMENT OF  
COMMISSIONER MICHAEL O'RIELLY**

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 two electronic notification items we are considering today proceed from our ongoing Modernization of Media Regulation Initiative, and frankly, reflect common sense. Recognizing the extent to which Commission business is now conducted online through email and electronic filing, these items transform our notification and carriage election processes to reflect how the modern world operates. Our actions also echo my endorsement of the broadcaster retransmission notification change when it was first proposed in the media modernization comment cycle. Some criticized this proposal, arguing that doing so would be unfair and too disruptive, but it was the right policy position at the time and this certainly remains the case after all the parties have come to common agreement. The old gotcha game using certified mail was a waste of time and we can do better.

Under this new process, modern technology can still achieve the underlying purpose for providing necessary notifications. With respect to the notices at issue in the NPRM, those cable companies provide to broadcasters, these documents can also be effectively delivered electronically, and we should quickly move to order on this piece. On a side note, as much as I like these items, we probably could have done without relying on phantom auxiliary authority provisions of section 4 and 303 to justify our overall statutory authority, especially when we have sufficient direct authority provided by sections 614 and 615.

In the end, thanks to the Chairman for continuing the Commission's media modernization efforts this month, and kudos to the stakeholders for working together to find mutually agreeable solutions to both items as we continue to drag our sometimes-reluctant media regulations into the Twenty First Century.

I approve.