

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendments of Parts 0, 1, 5, 73 and 74 of)	MB Docket No. 18-121
Commission's Rules Regarding Posting of Station)	
Licenses and Related Information)	
Modernization of Media Regulation Initiative)	MB Docket No. 17-105

**COMMENTS OF AMERICA'S PUBLIC TELEVISION STATIONS,
CORPORATION FOR PUBLIC BROADCASTING, NATIONAL
PUBLIC RADIO, INC., AND PUBLIC BROADCASTING SERVICE**

America's Public Television Stations ("APTS")¹, Corporation for Public Broadcasting ("CPB")², National Public Radio, Inc. ("NPR")³, and Public Broadcasting Service ("PBS")⁴ (collectively, "Public Broadcasting") submit these comments in response to the Federal Communications Commission's ("Commission") Notice of Proposed Rulemaking proposing to eliminate or streamline portions of the FCC's Rules mandating posting and maintenance of broadcast licenses ("NPRM").⁵

¹ APTS is a non-profit organization whose membership comprises the licenses of nearly all of the nation's CPB-qualified noncommercial educational television stations. The APTS mission is to support the continued growth and development of a strong and financially sound noncommercial television service for the American people.

² CPB is a private, non-profit corporation created and authorized by the Public Broadcasting Act of 1967 to facilitate and promote a national system of public telecommunications. Pursuant to its authority, CPB has provided millions of dollars in grant monies for support and development of public broadcasting stations and programming.

³ NPR is a non-profit membership corporation that produces and distributes noncommercial educational radio programs, including *All Things Considered*® and *Morning Edition*®, through more than 1000 radio stations nationwide. Each week, some 42 million Americans listen to public radio stations with millions more consuming programming on digital platforms and via podcasts. NPR's member stations are themselves significant producers of local, regional and national news, information and cultural programming. NPR also operates the Public Radio Satellite Interconnection System and provides representation and other services to its member station licensees.

⁴ PBS, with its 350 member stations across the country, offers all Americans the opportunity to explore new ideas and new worlds through television and online content. Each month, PBS reaches nearly 100 million people through television and nearly 30 million people online, inviting them to experience the worlds of science, history, nature and public affairs; to hear diverse viewpoints; and to take front row seats to world - class drama and performances.

⁵ See *Amendment of Parts 0, 1, 5, 73, and 74 of the Commission's Rules Regarding Posting of Station Licenses and Related Information*, Notice of Proposed Rulemaking, MB Docket No. 18-121, FCC 18-61(rel. May 10, 2018).

BACKGROUND

The Federal Radio Commission adopted rules requiring broadcast licenses to be posted almost 90 years ago. Today, these rules remain on the books despite the availability of station authorizations, ownership information, and contact information via the Commission's electronic database. These rules are incredibly outdated, and they create unnecessary burdens on broadcasters that are not placed on other FCC spectrum licensees simply because those other technologies were developed more recently.

Moreover, because the rules require that posted licenses reside in areas on broadcast stations that are not normally physically accessible by the public, this creates unnecessary and potentially costly issues related to the safety and security of station premises.

DISCUSSION

Public Broadcasting is concerned with the outdated Commission rules that continue to impose obligations to post licenses on the premises of broadcast stations. Public Broadcasting recommends the elimination of this unnecessarily burdensome rule and related rules within the Commission's regulations.

The FCC rules in question require physical posting of a station license at the principal control point of the station transmitter. Given that station licenses are readily available online for viewing and downloading, the posting of licenses on the broadcast premises no longer serves any purpose and may actually be counter to the public's safety interests. There is a similar rule for TV translators (74.785(a)) and FM translators (74.1265(a)), and these rules also should be eliminated given technological advancements that render them redundant and unnecessary.

CONCLUSION

Public Broadcasting appreciates the Commission's decision to review and reconsider this outdated and unnecessarily burdensome rule on noncommercial television and radio stations. Public Broadcasting further encourages the Commission to revise any other rules applicable to or which enforce the aforementioned rule.

Respectfully submitted,

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