

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

In the Matter of	)	
	)	
Amendment of Parts 74, 76 and 78 of the	)	
Commission’s Rules Regarding	)	
Maintenance of Copies of FCC Rules	)	MB Docket 17-231
	)	
Modernization of Media	)	MB Docket No. 17-105
Regulation Initiative	)	

**COMMENTS OF AMERICA’S PUBLIC TELEVISION STATIONS,  
CORPORATION FOR PUBLIC BROADCASTING, AND  
PUBLIC BROADCASTING SERVICE**

**SUMMARY**

America’s Public Television Stations, Corporation for Public Broadcasting, and Public Broadcasting Service (collectively, “Public Broadcasting”) file these comments in response to the Commission’s Notice of Proposed Rulemaking (“NPRM”) proposing to eliminate rules that require certain broadcasters to maintain paper copies of FCC rules.<sup>1</sup> This NPRM is related to the Commission’s Public Notice launching its Modernization of Media Regulation Initiative (MB Docket 17-105). In seeking to eliminate the obligation to maintain paper copies of Commission rules, the Commission is proposing to modernize rules which are over 40 years old and which have outlived their useful purpose. Public Broadcasting believes that the proposed modernized rules appropriately preserve the original intent of the rules in the modern day given the availability of Commission rules online.

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<sup>1</sup> *Amendment of Parts 74, 76 and 78 of the Commission’s Rules Regarding Maintenance of Copies of FCC Rules*, MB Docket No. 17-231, FCC 17-121 (rel. Sept. 26, 2017).

## COMMENTS

America's Public Television Stations ("APTS")<sup>2</sup>, Corporation for Public Broadcasting ("CPB")<sup>3</sup>, and Public Broadcasting Service ("PBS")<sup>4</sup> (collectively, "Public Broadcasting") submit these comments in response to the Federal Communications Commission's NPRM proposing the elimination of requirements to maintain paper copies of FCC rules. Public Broadcasting believes that the proposed modernized rule appropriately recognizes that paper copies of rules are no longer necessary given the immediate availability of Commission rules online.

The underlying rationale for the original paper copy rules was that broadcast licensees needed to be familiar with the Commission rules governing their stations. The Commission's proposed modernized rules preserves that rationale – licensees are still required to be familiar with the rules. However, there are much more effective means for licensees to remain familiar with the rules, including changes to the rules that take place periodically. Paper copies of the rule are not continually updated, and they are not searchable by licensees seeking to understand Commission requirements applicable to particular circumstances. In addition, given the availability of multiple sources of federal

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<sup>2</sup> APTS is a non-profit organization whose membership comprises the licensees 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.

<sup>3</sup> 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.

<sup>4</sup> 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.

rules online, including sources such as the Government Printing Office ([www.gpo.gov](http://www.gpo.gov)) which are available at no cost, the proposal results in significant efficiency for stations, including public stations that may operate under significant budgetary restraints.

### **CONCLUSION**

In today's robust online environment, there is simply no need for licensees to maintain paper copies of the rules. Public Broadcasting therefore supports the elimination of the rules requiring broadcasters to maintain paper copies of the Commission's rules. Public Broadcasting further supports the proposed modernized rules set forth in the NPRM.

Respectfully submitted,

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