

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Promoting Diversification of Ownership)	MB Docket No. 07-294
In the Broadcasting Services)	
)	
Amendment of Part 1 of the Commission's)	MD Docket No. 10-234
Rules, Concerning Practice and Procedure,)	
Amendment of CORES Registration)	
System)	

To: Secretary, Federal Communications Commission
Attention: The Commission

**JOINT COMMENTS
OF PUBLIC TELEVISION AND RADIO LICENSEES**

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SUMMARY

These joint comments are submitted on behalf of seventy-two (72) noncommercial educational (“NCE”) television and radio licensees (the “Public Broadcasting Licensees”) who collectively operate hundreds of NCE stations over which they provide an incredible array of services to their communities. The Public Broadcasting Licensees are public and private universities, state educational communications authorities, boards and commissions, community and technical college districts, and non-profit community-based public media enterprises.

The Public Broadcasting Licensees strongly oppose the FCC’s imposition of commercial station ownership reporting requirements on NCE licensees, including any requirement that individuals reported on FCC Form 323-E obtain Restricted Use FRNs (“RUFNRs”), if doing so requires these individuals to submit highly sensitive personal information, including their residential addresses, dates of birth and last four digits of their social security numbers.

The collection of information about governing board members of NCE stations will contribute nothing useful to the FCC’s picture of diversification of broadcast ownership, because persons reported on NCE ownership reports are not “owners.” Moreover, the information proposed to be submitted to obtain an RUFNR poses grave risks of identity theft, violations of privacy, and compromised personal security, thus making it more difficult to recruit and maintain qualified NCE station board members and causing damage to NCE stations’ board membership structures.

There are unique considerations that should lead the FCC not to require individuals reported on FCC Form 323-E to provide such sensitive personal information. Experience shows that unpaid volunteers and public officials serving on NCE governing boards are strongly against submitting this information to station management or to the FCC. Requiring board members to

provide Sensitive Private Information as a condition of service will discourage worthy individuals from volunteering, bring down the ire of public officials on NCE stations (and the FCC), and create compliance difficulties for stations whose board members who do not wish, or simply refuse, to make the necessary disclosures.

Owners of commercial radio and TV stations have financial goals motivating their decisions to invest, and they can weigh the potential harm of disclosures of sensitive personal information against the benefits of ownership. But NCE station board members obtain no financial benefit by virtue of their service, and thus it will be too easy, and too common, for worthy individuals to decline to serve if they are required to provide such information.

But more fundamentally, the ownership reporting regime imposed on commercial station licensees should not be applied to NCE stations at all. NCE stations are all licensed to governmental agencies, public and private non-profit educational institutions and private non-stock entities established to serve educational and public service missions. These entities do not have individual “owners” in any sense of that term – no investors, no stock, and no sharing in income or assets. The governing board members of NCE stations are unpaid local community volunteers (who donate their time and often their money to serve), unpaid volunteers who serve on the boards of educational institutions holding NCE licenses, and elected or appointed public officials who serve on boards by virtue of their holding other positions in state and local governments. Simply put, even though they are reported on an NCE “ownership report,” these individuals are not “owners.”

That being so, the purpose underlying the collection of information about “owners” – to devise strategies for increasing the presence of women and minorities in the ownership ranks of

broadcasting -- is not served by collecting such information about NCE station governing board members.

These realities have been presented several times to the FCC in earlier stages of this proceeding, yet the FCC persists in pushing the notion of applying commercial ownership reporting requirements to NCE stations. The time has come for the FCC to put this misguided notion to rest.

Furthermore, the FCC's proposal to require NCE station board members to provide their residential addresses, dates of birth and last four digits of social security numbers is not a safe solution to the issue of personal identification. With this information, a person's identity can easily be stolen, and their privacy invaded. For example, studies have shown that, in a significant percentage of cases, possession of the last four digits of a person's SSN can result in the entire SSN being predicted. That is particularly the case if the date of birth is also known.

There are security issues related to disclosure of home addresses. NCE board members have received personal security threats, and therefore information about board members' residences is not generally made available publicly. NCE stations also often have high level public officials and ranking military officers on their boards who are required by the realities of modern life to carefully guard their personal information.

Finally, the Public Broadcasting Licensees are appalled that the FCC would label a volunteer or public official NCE board member who declines to provide the FCC with sensitive personal information as "recalcitrant." They worry that the FCC's view that such NCE board members are "recalcitrant" may be a first step towards enforcement action against such these individuals or the NCE stations they serve. That result would be highly unfair and inappropriate.

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**JOINT COMMENTS
OF PUBLIC TELEVISION AND RADIO LICENSEES**

The group of seventy-two (72) public television and radio station licensees shown below (collectively, "Public Broadcasting Licensees"), by their attorneys, submit these joint comments responsive to the *Second Further Notice of Proposed Rulemaking and Seventh Further Notice of Proposed Rulemaking* in MB Docket No. 07-294 and MD Docket No. 10-234, FCC 15-19 (released February 12, 2015) ("*Further Notice*"). The *Further Notice* proposes to require "Restricted Use" FRNs ("RUFNRNs") to be used in reporting individual attributable interest holders on ownership reports filed by noncommercial educational ("NCE") radio and television stations.

The Public Broadcasting Licensees oppose the proposal. The collection of information about governing board members of NCE stations will contribute nothing useful to the FCC's picture of diversification of broadcast ownership, because persons reported on NCE ownership reports are not "owners." Moreover, the information

proposed to be submitted to obtain an RUFNRN poses grave risks of identity theft, violations of privacy, and compromised personal security, thus making it more difficult to recruit and maintain qualified NCE station board members and causing damage to NCE stations' board membership structures.

Introduction

The Public Broadcasting Licensees are public and private universities and university systems, state educational communications authorities, boards and commissions, community and technical college districts, and non-profit community-based public media enterprises. Collectively, they are licensees of hundreds of full power public television and radio stations, and numerous television and FM translator stations and related facilities, over which they provide an incredible array of services to their local communities.

The Public Broadcasting Licensees acknowledge the Commission's desire to obtain accurate information on diversity of ownership of broadcast stations. However, as the Public Broadcasting Licensees have urged in earlier rounds of this proceeding, the concepts of ownership applicable to *commercial* broadcast stations have no applicability to *noncommercial educational* broadcast stations because NCE stations are not owned by individuals. If the Commission's purpose in proposing changes to NCE ownership reporting is to collect information about the diversity of the "owners" of NCE stations, the proposal is misplaced. No good purpose would be achieved by the imposition of commercial station ownership filing requirements on NCE stations.

That being obviously so, the Public Broadcasting Licensees are puzzled why the Commission continues to pursue misguided NCE ownership reporting proposals rather than concluding that the ownership concepts applicable to commercial stations simply do

not apply to NCE stations. Now is the time for the FCC to decide that NCE stations should not be regulated the same way as commercial stations in their “ownership” filings, and therefore changes to the commercial station ownership reporting regime should not be carried over to the NCE context.

Unique Considerations Applicable to NCE Broadcasting “Ownership”

In ¶ 28 of the *Further Notice*, the FCC asks whether there are “unique considerations” with respect to NCE stations that would lead to a different conclusion for NCEs than for commercial stations with regard to the information proposed to be submitted to obtain an RUFNR. As shown below, there certainly are unique considerations that should lead the FCC not to require NCE station board members to provide their full names, residence addresses, dates of birth and last four digits of their SSNs (collectively, “Sensitive Private Information”).

However, before the Commission even reaches that question, it really needs to determine whether the commercial ownership reporting regime should be applied to NCE stations at all. Although the *Further Notice* punts once again on this fundamental question, the Public Broadcasting Licensees strongly believe that it does not make sense to apply *any* of the commercial ownership reporting regime to NCE stations, and thus (among other things) require individuals disclosed on Form 323-E to obtain RUFNRs at all.

Under Sections 73.503(a) and 73.621(a) of the Commission’s rules, all NCE station licensees have to be “nonprofit educational organizations.” In the case of the Public Broadcasting Licensees, these nonprofit educational organizations include governmental agencies, public and private educational institutions and private non-stock entities that exist to serve educational and public service purposes. These entities do not

issue stock. They do not have stockholders. No persons invest funds in exchange for an interest in these entities, and no persons have a right to any share of their revenue, net income or assets. They thus have no individual “owners.”

Needing to assign ultimate responsibility for and control over broadcast station operations, the Commission has traditionally looked to an NCE station licensee’s governance structure. Thus, the current Form 323-E seeks information about persons who serve on a licensee’s governing board.

However, the practice of reporting governing board members on NCE station “ownership” reports does not make them owners. Perhaps the confusion on this issue would be cleared up if the FCC adopted a term other than “ownership” for the information reported on FCC Form 323-E, as the inaccurate “ownership” nomenclature seems to be inexorably driving this process to an inappropriate result.¹

The roles and motivations of board members of public or private nonprofit entities are not the same as those of owners of for-profit corporations operating commercial broadcast stations. No NCE board member has an investment stake in his or her NCE broadcast station, and board members are not motivated by a desire to obtain any financial return to themselves. Governing board members of NCE broadcast stations are (1) unpaid volunteers who support (often with donations of both their time and their money) the educational and public service of the public broadcasting station in their community or region, (2) unpaid volunteers who serve on the board of an educational institution to which the station is licensed, or (3) elected or appointed public officials who serve on station governing boards by virtue of their holding other positions in state or

¹ Confusion about the nature of NCE “ownership” might be cleared up if the FCC were to change the name of Form 323-E to “Governance Report” rather than “Ownership Report.”

local government (such as governor, superintendent of public instruction, member of the state legislature, or member of a governmental commission).

Thus, NCE station “ownership” structures are indeed “unique” as compared to those of commercial broadcasters, in that there simply are *no individual owners*. That being so, there is no reasonable basis to suggest that collecting and reporting “owners” data for NCE stations would contribute to a more accurate picture of broadcast ownership in the United States.

The Commission states in the *Further Notice* at ¶ 21 that collection of ownership data “enables the Commission to assess the current state of minority and female ownership of broadcast stations.” In repeatedly raising the idea that NCE stations might need to report the gender and minority status of their governing board members, the Commission presumably suggests that data from NCE stations is necessary to provide a comprehensive nationwide picture of broadcast ownership. *But in fact just the opposite is true*. Including information about individuals who are *not* broadcast station owners detracts from the accuracy and usefulness of the data that are collected about ownership of commercial broadcast stations, because the data would be mixing two different sets of people -- some of whom are owners and some of whom are not.

Even if the Commission were to collect information on NCE station board members and then keep that data separately from commercial station ownership data, so as not to skew the real ownership data, significant doubts can be raised about whether the separate NCE data are then worth collecting. The Commission’s ultimate goal, and its motivation for collecting data about women and minority owners, is to devise strategies for increasing their presence in broadcast ownership. These strategies would rely on market-based incentives to lower the economic or regulatory cost of ownership for these

individuals. Plainly, however, given the nature of NCE station governance, such market-based strategies would be irrelevant, as NCE board membership is not determined by the cost of investment in broadcast properties or prospective financial gain from such ownership.

When these questions were first raised in the 2009 *Fourth Further Notice of Proposed Rulemaking* (“*Fourth Further Notice*”),² the Commission seemed to have an objective and useful understanding of the essential distinctions between ownership in the commercial broadcasting context and in the NCE context. In footnote 69 of the *Fourth Further Notice*, the Commission acknowledged that the structure and organization of NCE licensees raise difficult issues in defining ownership. The Commission even referred to a 1989 proceeding³ that had been intended to define when transfers of control take place in the NCE context, but which was ultimately abandoned. The FCC presumably terminated that effort⁴ because of the practical and theoretical difficulties involved and the fact that there was no perceived problem with the current approach to NCE governance and reporting.

Nothing has changed. NCE governing board members are still not owners. Collection of information about their gender and ethnicity still would not provide information about ownership of broadcast stations. It is time for the FCC to recognize that reality.

² *Promoting Diversification of Ownership in the Broadcasting Services*, Report and Order and Fourth Further Notice of Proposed Rulemaking in MB Docket No. 07-294 *et al.*, 24 FCC Rcd 5896 (2009).

³ *Transfer of Control of Certain Licensed Non-Stock Entities*, Notice of Inquiry in MM Docket No. 89-77, 4 FCC Rcd 3403 (1989) (“*1989 Non-Stock Entity NOP*”).

⁴ See *Termination of Rulemaking Proceedings*, Order, FCC02-3 (released January 11, 2002).

RUFRN Requirements for NCE Stations

The Commission now proposes to require that RUFRNs be provided for all individuals reported on Form 323-E. The Public Broadcasting Licensees oppose such a requirement as both unnecessary (as noted above) and uniquely harmful to NCE stations.

There is no question that forcing NCE station board members to disclose Sensitive Private Information will cause difficulties. Experience shows that unpaid volunteer and public officials, having no financial stake in an NCE station licensee, do not want to submit their social security numbers or other private information and are very reluctant to do so. As the FCC has previously been informed, several of the Public Broadcasting Licensees also hold licenses for commercial stations (FM and Class A LPTV) and have been subject to the Form 323 reporting regime for those stations. Following the Commission's previous decision to require their board members to obtain FRNs, but before the FCC instituted the Special Use FRN option, these licensees experienced vociferous objections from board members, including in one case a senior political official of a state, and in another case a private citizen who resigned from the NCE station's board rather than disclose his social security number in the FCC FRN registration process.

Based on this experience, their understanding of board members' sensitivities and expectations, and what they hear from current board members, the Public Broadcasting Licensees believe that requiring board members to provide Sensitive Private Information as a condition of service will discourage worthy individuals from volunteering, bring down the ire of public officials on NCE licensees (and the FCC), and cause compliance difficulties for stations whose board members who do not wish, or simply refuse, to make the necessary disclosures.

For a commercial station owner or prospective owner hoping to achieve financial objectives in becoming or remaining an owner, the person can weigh the potential harm to him or herself caused by the FCC's collection of Sensitive Private Information against the potential benefits of the investment, and he or she may decide that the benefit of ownership outweighs the harm of disclosure. But NCE station board members obtain no potential financial benefits by virtue of their participation on a station's governing board, and thus it will be all too easy, and unfortunately all too common, for the FCC's insistence on collection of Sensitive Private Information to cause worthy board members and prospective board members to decline participation on NCE station boards. Thus the FCC's proposal, if adopted, will cause serious harm to NCE stations.

Given that no substantial useful purpose has been shown to support the collection of Sensitive Private Information from NCE licensees because the information from NCE stations has no relevance to "ownership" of broadcasting, and given that the FCC's proposal will discourage and unnecessarily complicate NCE board participation, the FCC should conclude that the proposal makes no sense in view of the unique nature of NCE governance and proposal's unique harm to NCE licensees.

Identify Theft and Violations of Privacy

The FCC has rightly backed off on its prior proposals to require all persons reported on ownership reports to provide their SSNs to obtain an FRN. However, the FCC's current proposal to collect Sensitive Private Information is hardly any better in respecting privacy and avoiding the risk of identity theft, and it should also be abandoned.

It is clear that the collection of only the last four digits of an SSN is not a safe solution. The five numbers of the SNN that would not be revealed are not randomly

assigned by the Social Security Administration, as they are based on geographical locations.⁵ It takes very little effort to discover the remaining ‘hidden’ numbers, thus making identity theft significantly simpler and much more likely.

Indeed, it has long been shown that possession of the last four digits of an SSN, particularly combined with date of birth information, would permit hackers to predict full social security numbers to a significant degree. For example, in one study conducted at Carnegie Mellon University, researchers were able 44% of the time to predict the first five digits of the SSN for persons born after 1989.⁶ Thus the disclosure of the combination of date of birth, address and last four social security digit numbers is an invitation to identity theft.

Higher education institutions have recognized the need to protect the confidentiality of similar combinations of information which can be used to steal identities. Thus, for example, the California State University System (the largest four-year public university system in the United States, with over 400,000 students, and an NCE broadcast licensee), mandates the highest level of information security – designated by the University as “Level 1 Confidential” -- for a person’s birth date combined with the last four digits of the SSN, noting that unauthorized disclosure of that combination of information “could result in severe damage to CSU, its students, employees or customers...” and “[f]inancial loss, damage to the CSU’s reputation and legal action...”⁷

In addition, NCE licensees are concerned about security issues related to

⁵ See *Structure of Social Security Numbers*, <http://www.usrecordsearch.com/ssn.htm>, for a discussion on how those numbers have been and are determined.

⁶ *Social Security Numbers are Easy to Guess*, <http://news.sciencemag.org/2009/07/social-security-numbers-are-easy-guess> (July 6, 2009).

⁷ California State University, Information Security Data Classification Standards, available at http://www.calstate.edu/icsuam/sections/8000/8065_FINAL_DRAFT_Data_Classification_CW_V4.pdf.

publication of home addresses. University board members have received personal security threats, and therefore information about board members' residences is not generally made available publicly. Universities also often have high level public officials and ranking military officers who are required by the realities of modern life to carefully guard their personal information, often to the extent of only identifying a post office box for university mailings.

In the *Further Notice*, at ¶ 5, the FCC notes that no commenter has identified a single instance of a security breach of the CORES system (which, we feel constrained to point out, is not the same thing as the FCC actually telling us that there has never been such a breach). The FCC also states that the Commission uses a robust security architecture for CORES that exceeds Federal Guidelines and recommendations. However, even if the FCC's systems have never been breached to date, the FCC cannot guarantee that these systems cannot be breached in light of the numerous supposedly secure public and private systems that have been hacked.

Indeed, the Public Broadcasting Licensees suspect that if the FCC's CORES system hasn't been breached to date, it may be due more to the fact that hackers haven't been interested enough to make the effort. But hackers may well be considerably more interested if CORES becomes a treasure trove of personal information on broadcast investors and NCE licensee board members, including high profile persons.

The "Recalcitrant" Individual

Finally, in ¶18 of the *Further Notice*, the FCC asks for comment on whether Special Use FRNs should remain available in the case of "recalcitrant" individuals. Webster defines recalcitrant as "stubbornly disobedient" and "obstinately defiant of authority." The Public Broadcasting Licensees cringe at the FCC's apparent disdain for

individuals – who in the NCE context are unpaid volunteers or public employees and officials -- who in good faith fear that the collection and maintenance of highly private and compromising information in an agency’s database might lead to unauthorized disclosures that would allow their identities to be stolen and their privacy and safety to be compromised. They also worry that the FCC’s view that such NCE board members are “recalcitrant” may be a first step towards enforcement action against such these individuals or the NCE stations they serve. The FCC’s labelling of such individuals as “recalcitrant” is highly inappropriate and objectionable.

That said, should the FCC ultimately determine to ignore the harm that would result from unnecessarily pounding the square peg of the commercial ownership reporting regime into the round hole of NCE broadcasting, it should absolutely permit individuals reported on Form 323-E who do not want to disclose Sensitive Private Information to obtain and use a Special Use FRN that can be obtained without the disclosure of such information, and it should impose no sanction on such individuals and their associated licensees as a result of their doing so.⁸

Conclusion

For the foregoing reasons, the Public Broadcasting Licensees urge the Commission to make no changes to Form 323-E and the associated filing process for the form, and to reject the mandatory use of RUFNRs for persons reported on that form.

⁸ Perhaps the FCC would do better improving the SUFRN process, for example by enabling stations to look up individuals they need to report who use SUFRNs to determine whether they have been reported using more than one such SUFRN. It would probably be better and easier to solve the problems noted with the use of the SUFRNs, rather than to create RUFNRs under the proposal here.

Respectfully submitted,

ALASKA PUBLIC TELECOMMUNICATIONS,
INC.

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