

Before the  
**Federal Communications Commission**  
Washington DC 20554

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

**COMMENTS OF  
TAYLOR UNIVERSITY BROADCASTING, INC.**

Taylor University Broadcasting Incorporated (TUBI), licensee of WBCL, Fort Wayne, IN (Fac. ID. 64658); WBCJ, Spencerville, OH (Fac. ID 64660); WBCW, Upland, IN (Fac. ID 64659); WBCY, Archibold, OH (Fac. ID 64657); and WCVI, Bronson, MI (Fac. ID 41670), hereby submits these Comments in the above-captioned proceedings.

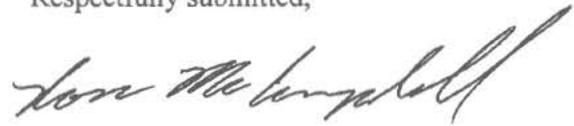
TUBI opposes the Commission's proposal to include noncommercial educational (NCE) stations in its plan to require all those with an attributable interest in a broadcast station to submit personally identifiable information, including their residential address, date of birth, and part of their Social Security Number (SSN), for the purpose of tracking their "ownership" of broadcast licenses. Of course, the members of an NCE licensee's Board are not actually owners of a broadcast licensee, and if only for that reason, including them in the Commission's planned review of broadcast licensee ownership is unjustified.

TUBI believes it is extremely important that non-profit organizations provide an opportunity for individuals to serve those organizations. One of the highest levels of service a citizen can perform is being involved in the governing, financial, and strategic decisions of a non-profit organization serving his or her community through membership on its Board. Having quality Board members is critical to the overall strategic and financial stability of any non-profit entity, especially NCE radio stations.

TUBI strongly believes that requiring personal information from each officer and member of the governing Board of NCE licensees will put an obstacle in the way of finding strong, competent station leadership and non-profit Board membership as many individuals want to serve in relative privacy, allowing their name to be associated with the organization, but preferring to keep other personal information private. This in turn will undermine the ability of those NCE licensees to perform their missions of serving their communities. Requiring NCE stations to list their Board members and provide an address for each is sufficient for the purposes of Commission regulation of NCE stations. Requiring residential addresses, birth dates, and partial Social Security numbers opens Board members up to far greater personal exposure and reveals far more personal information than many will be comfortable sharing.

Implementing such a requirement would also discourage potential board members from serving for personal security concerns. Given the continued and growing threat of identity theft, the burden on one seeking to create a database of personal information on prominent individuals which identity thieves may someday access is extremely high. Even if the security procedures are strong, this requirement will cause hesitation in the minds of those who would normally have no qualms about serving at a higher level at a NCE licensee, thereby harming those licensees and the public interest.

Respectfully submitted,



Ross McCampbell  
1115 West Rudisill Blvd.  
Fort Wayne, IN 46807  
(260) 745-0576  
*Executive Director of Taylor University  
Broadcasting, Inc.*

March 27, 2015