

The Commission should categorically exempt non-commercial educational stations permanently from the online public file requirements based on their limited resources, including money, time and staff. An NCE typically is operated by a small group of dedicated individuals, many of whom are volunteer or part-time staff who are devoted to delivering the highest quality of programming possible with these limited resources. It will take away valuable professional staff time to maintain an online public file or to train numerous volunteers on how to do so. Requiring NCE radio stations to participate in the online public file requirement, even on a delayed schedule, would be terribly onerous. In the event that the Commission should decide to require NCE stations to participate, NCE stations should not be required to include donor lists in the online public file. Donors sponsoring programs will be much less likely to continue to support those programs if their names are made public online, which is a far more enduring record than the paper file.