

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

In the Matter of)
)
Expansion of Online Public File Obligations) MB Docket No. 14-127
To Cable and Satellite TV Operators and)
Broadcast and Satellite Radio Licensees)
)

To: The Commission

COMMENTS OF PALM HARBOR RADIO, INC.

Introduction

Palm Harbor Radio Inc., licensed as WZIG-LP, Palm Harbor Florida, respectfully submits its comments in response to the Commission's Notice of Proposed Rulemaking in the above proceeding.

WZIG-LP is a non-profit, all-volunteer radio station that provides educational non-commercial programming to the local community.

**The Commission should use an incentive-only method to encourage
non-commercial stations to move the Public File online.**

Due to the highly restricted budgets of non-commercial stations, they should be relieved of the online requirement. This is particularly true of Low Power stations.

However, some non-commercial stations do have the capability of adding those files and should be encouraged to do so with an incentive: relief from on-site routine inspections in return for placing the public file online. If a station places its public file online and it

passes inspection, then the station should be exempt from a routine inspections for 3 years.

This is similar to the fee-based inspections offered by organizations like the Florida Association of Broadcasters. Unfortunately the fee charged is a substantial burden to small stations. The regulatory substitute for the fee-paid service would benefit both the small station budgets and the FCC by reducing inspection costs.

Should a station be selected for inspection and passes the online inspection, the station shall be notified as such and that routine or random inspections are waived for 3 years.

An additional incentive would be to treat online files missing minor portions of the Public File with an informal warning rather than a formal warning or fine. Minor might be missing less than 10% of a particular documentation requirement such as EAS or other logs.

We believe that relief from regulation for those who demonstrate compliance is stronger regulatory incentive than punitive actions.

As with all stations, inspections triggered by cause can be done at any time.

Respectfully submitted,

PALM HARBOR RADIO, INC.

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