

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

REPLY COMMENTS

The Office of Communication, Inc., of the United Church of Christ, Media Alliance, Benton Foundation,¹ Common Cause, Communications Workers of America, Media Council Hawai'i, and Prometheus Radio Project (collectively, "UCC *et al.*"), by their counsel, the Institute for Public Representation,² respectfully reply to comments filed in response to the Seventh Further Notice in the above-referenced proceeding.

All of the comments in this proceeding except for those by UCC *et al.* were filed on behalf of Non-Commercial Educational stations (NCEs). The NCEs generally object to amending Form 323-E to include race and gender information—an issue that remains pending in the Fourth Further Notice. Because no commercial broadcasters have opposed the use of RUFNRs, the Commission should promptly adopt RUFNR for commercial stations. It is important that the RUFNRs be in place before the next date for filing Form 323.

The Seventh Further Notice makes clear at paragraph 28 that RUFNRs would be used by NCEs only "in the event that the [NCE proposals] are adopted." Thus, if the FCC adopts the

¹ The Benton Foundation is a nonprofit organization dedicated to promoting communication in the public interest. These comments reflect the institutional view of the Foundation, and unless obvious from the text, are not intended to reflect the views of individual Foundation officers, directors, or advisors.

² IPR gratefully acknowledges Georgetown Law Student Thomas A. Ball for his work in preparing this reply.

proposal in the Fourth Further Notice, as UCC *et al.* have urged, it can decide whether to allow the use of RUFNRs at that time.

Respectfully submitted

/s/

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